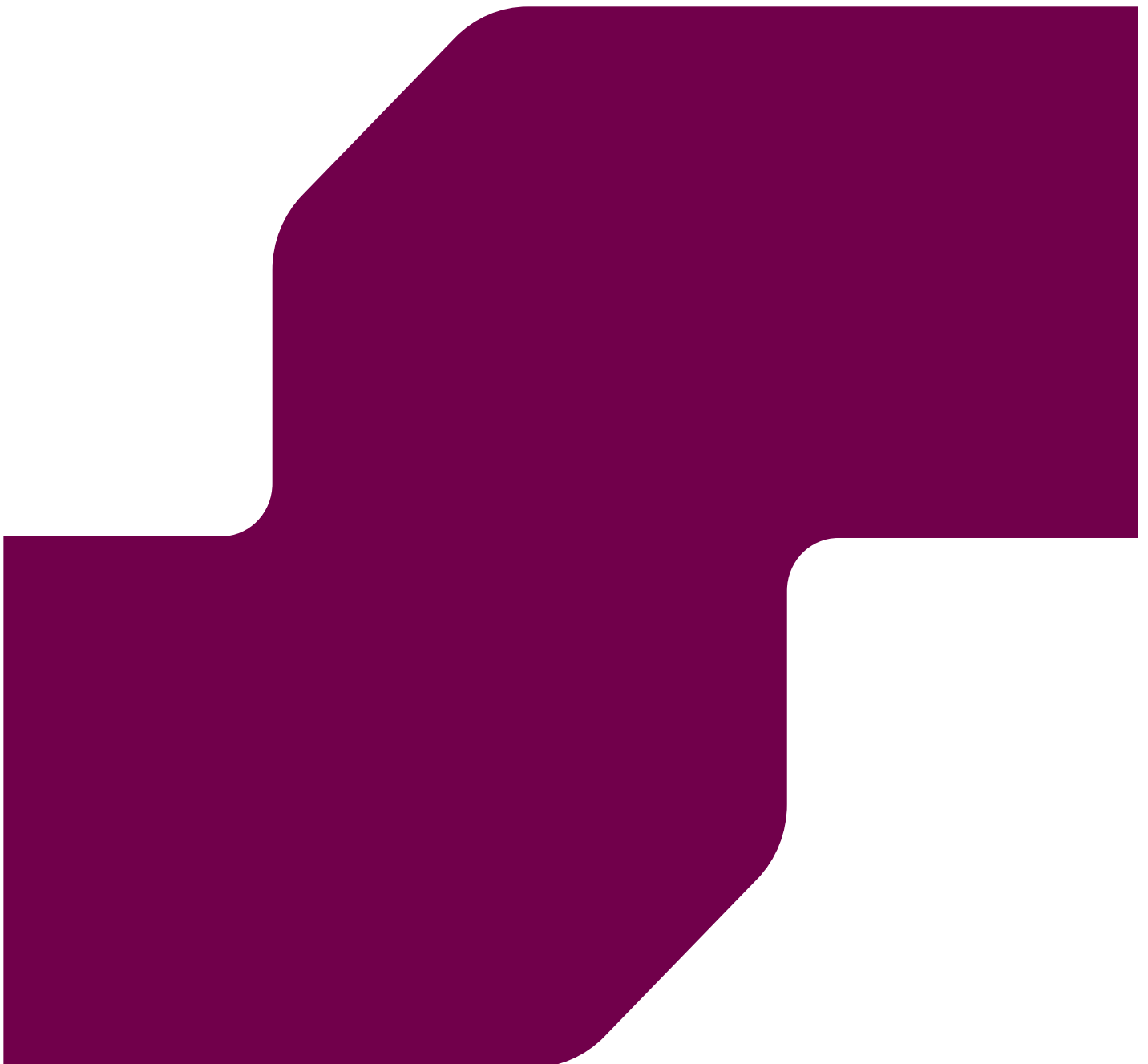


Odour Management Plan

Energy from Waste Facility, Corby

For Encyclis Limited



ODOUR MANAGEMENT PLAN

Quality Management			
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1 Introduction

Background

- 1.1 The energy from waste (EfW) facility is located at Shelton Road, Willowbrook East Industrial Estate, Corby, NN17 5XH.
- 1.2 RPS was commissioned by Encyclis Limited (Encyclis) to prepare an Odour Management Plan (OMP) for the Corby EfW facility.
- 1.3 The permit application is for a new EfW facility that will be designed to handle up to 357,408 tonnes of non-hazardous waste per annum. Waste will be combusted in a moving grate furnace with a nominal design feed rate of 33.2 tonnes per hour and maximum feed rate of up to 45 tonnes per hour. The furnace will be designed to achieve a minimum temperature of 850°C for at least 2 seconds. White diesel will be used to start and shutdown the plant but once operating temperatures are reached, waste will normally be burned without the need for any auxiliary fuel.
- 1.4 A flue gas treatment system will be provided for each line to clean the gases prior to discharge. The abatement systems to be provided will include NO_x abatement using ammonium hydroxide solution; acid gas abatement using hydrated lime, dioxins, furans and volatile heavy metals abatement using activated carbon and a bag filter for the abatement of particles (including particle phase heavy metals). Cleaned flue gases will be discharged from a 75 m high stack.

Odour Management Plans – Purpose and Scope

- 1.5 An OMP is a live working document that formalises and describes how odour issues will be managed on the site. An OMP essentially forms part of the operational Environmental Management System (EMS).
- 1.6 An OMP should show how odours are being managed and controlled so as to prevent or minimise the impacts. As well as covering normal operations, it should anticipate and plan for abnormal events and foreseeable accidents and incidents.
- 1.7 The control measures that can be applied will be different depending on whether the odour releases are from a point source or fugitive sources; but an OMP is relevant to both situations.
- 1.8 Additionally, OMPs complement engineering control measures (e.g. abatement systems) on sites with controlled point-source emissions, where there is a significant risk of any odour nuisance associated with plant failure and external factors outside the control of the operator (a quantitative approach to this type of odour incident being extremely difficult) [1].
- 1.9 Therefore, OMPs have become a front-line tool for the effective control of odours at a wide range of sites, processes and facilities where there is potential for significant odour impacts.

1.10 An OMP is itself an important control measure based on good management principles. It should follow basic management system principles:

1. **Plan** – identify releases (normal and abnormal conditions) and document the control measures for each
2. **Do** – apply the control measures (routine and additional)
3. **Check** – verify if the measures are working well enough, review and revise to keep effective

1.11 The basic management system principles are summarised in the following flow diagram.

1.12 It can also be seen that working to an OMP is an iterative process which, if followed properly, should be effectively self-regulating and should require little detail intervention from outside:

- it requires the operator to take the appropriate action to bring any problems under control or else (ultimately) suspend operations; and
- if there is an odour problem, it should be picked up (through monitoring, complaints system) and the control processes reviewed and tightened to deliver the objective (no significant odour impact off-site).

1.13 This OMP has the following structure:

Section 2 – a description of the site, process and main sources of odour;

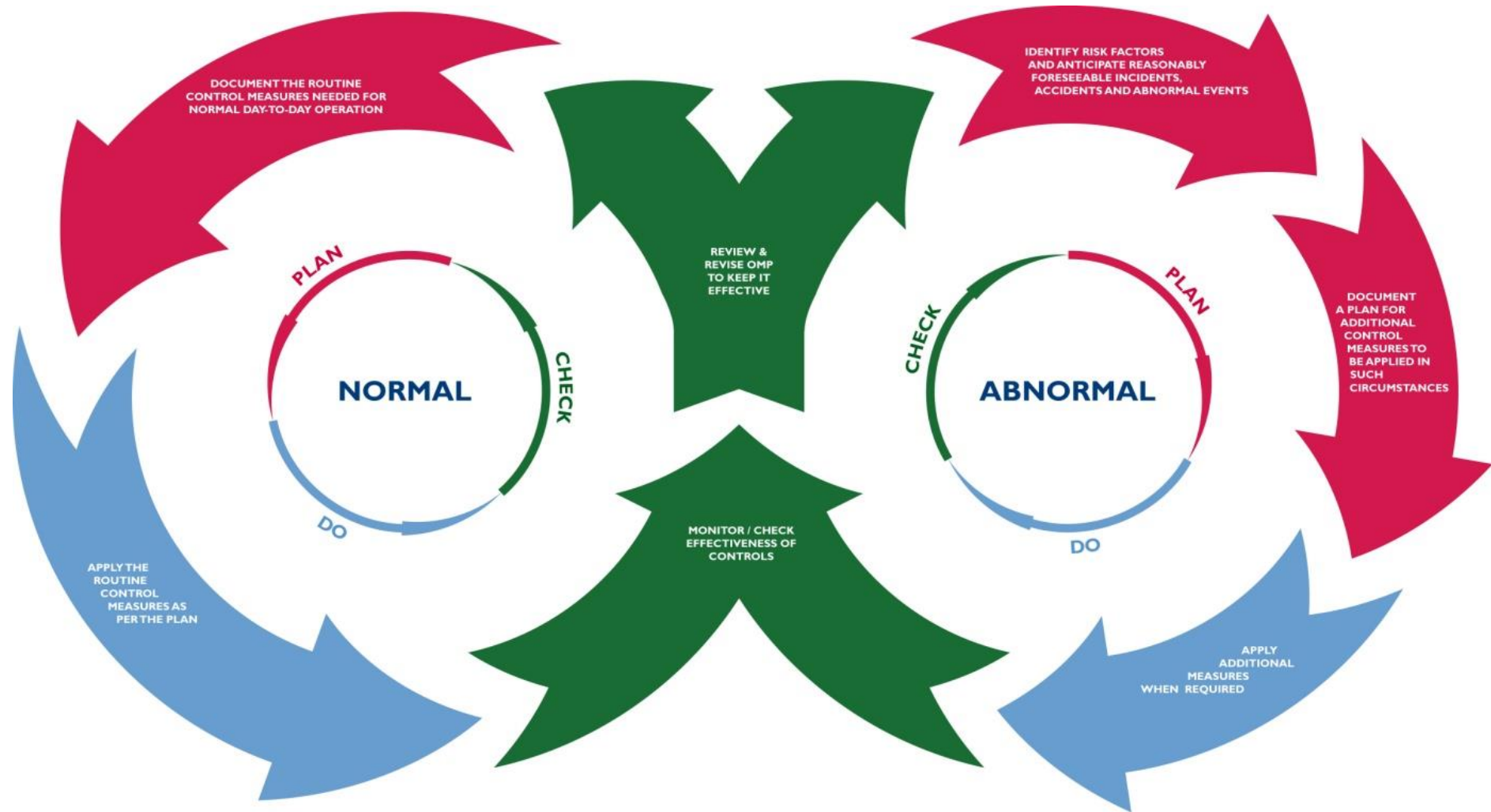
Section 3 – measures that are used to control odour during normal operations;

Section 4 – routine maintenance and inspection;

Section 5 – routine monitoring, recording and reporting;

Section 6 – measures that will be used to control odour during maintenance and any abnormal events; and

Section 7 – management measures taken to control odours.



Odour Management Plans – Permitting Requirements

- 1.14 The current form of odour condition within Environmental Permits comprises two elements:
1. an odour boundary condition, which specifies the outcome which the operator must achieve (i.e. no pollution beyond the site boundary); and
 2. a condition requiring implementation of an OMP. (A Permit may also contain quantitative conditions relating to numerical emissions limit values (ELVs) for controlled point-source odour emissions.)
- 1.15 The Environment Agency (EA) in its technical guidance note H4 Odour Management [1] provides advice on management of odour to comply with Environmental Permits and aspects that should be dealt with in an OMP.
- 1.16 This OMP provides information on the measures to be implemented to control odour emissions from the Corby EfW facility. It is based on best-practice requirements in the various government and professional guidance documents on OMPs [2,3,4,5,6] and includes the EA's requirements for OMPs as part of the permitting process, as described in its H4 Odour Management guidance. All these guidance documents stress that the OMP should be risk-based, with the level of depth, complexity and sophistication of the OMP being dependent on the complexity of the processes and the potential impact of the odour on neighbouring premises: where a process may produce particularly offensive odours, then the OMP will necessarily be detailed and thorough; conversely, for a process with a lower potential odour impact, a simpler OMP will suffice.
- 1.17 To fully meet these requirements, this OMP includes the following:
- A process description, particularly describing odorous, or potentially odorous, activities or materials used;
 - Identification of all the odour sources for each of the activities and their locations;
 - Identification of the sensitive receptors within the area of influence that could be impacted;
 - A description of the routine mitigation/control measures that will be used day-to-day under normal operating conditions in the absence of any unusual risk factors;
 - Identification of possible risk factors (e.g. equipment/control failures, abnormal/unintentional situations, adverse weather conditions, spillages, etc.); and a listing of the consequences for odours of these risk factors;
 - A description of the additional measures that will be applied during these periods to deal with these risks and any reasonably foreseeable incidents and accidents;
 - A list of the actions in detail and who is responsible for carrying them out;
 - A description of what will trigger the further action/additional measures;

- A description of the roles and responsibilities of personnel on site (e.g. organisational chart), and the training and competence of staff in odour-critical roles;
- Details of how the following will be carried out, and who has been assigned managerial and operational responsibilities for them: implementing and maintaining the OMP; responding to odour-related incidents; planned maintenance and repair and the keeping of essential odour-critical spares; regular review of the effectiveness of odour controls (including the OMP itself); engaging with neighbours and communicating with relevant interested parties; and keeping records of all activities and actions relating to odour and the OMP.

1.18 This OMP takes all of the above into account and [Table 1.1](#) shows how specifically this covers the H4 requirements.

Table 1.1: OMP Requirements in Guidance and location in this OMP

Good-practice OMP requirement	EA final H4 (2011)	SEPA Odour Guidance 2010	Defra Odour Guidance for LAs (2010)	Defra Composting Good Practice for LAs (2009)	Defra CoP on Odour from STWs (2006)	Sniffer OMP report for landfill Sites (2013)	Relevant section in this OMP
A process description, particularly describing odorous, or potentially odorous, activities or materials used (inventory)	X	X	X			X	2
Identification of all the release points for each of the activities (plan/map if possible)		X	X	X	X	X	2
Identification of the sensitive receptors within the area of influence that could be impacted (plan/map if possible)	X	X	X		X	X	2
A description of the routine methods and mitigation/control measures that will be used day-to-day under normal operating conditions in the absence of any unusual risk factors (including pre-acceptance, receipt, inspection, acceptance/rejection of materials, storage, containment, handling, treatment and timing of activities).	X	X	X	X	X	X	3
A list of the actions in detail and who is responsible for carrying them out		X	X	X	X	X	3
Identification of possible risk factors (e.g. adverse weather conditions) and anticipation of odour-related incidents and accidents (e.g., abnormal situations, spillages, power failure, breakdown of doors, equipment or abatement) and a listing of the consequences for odours of these risk factors	X	X	X	X	X	X	4

Good-practice OMP requirement	EA final H4 (2011)	SEPA Odour Guidance 2010	Defra Odour Guidance for LAs (2010)	Defra Composting Good Practice for LAs (2009)	Defra CoP on Odour from STWs (2006)	Sniffer OMP report for landfill Sites (2013)	Relevant section in this OMP
A description of the additional measures (e.g. additional control measures and modifications to site operations for example diverting odorous waste loads to facilities with less sensitive surroundings during adverse weather conditions) that will be applied during these periods to deal with these risks and any reasonably foreseeable incidents and accidents. If the measures are not sufficient, they need to be tightened further or else possibly ceasing / reducing odorous operations.	X	X	X	X	X	X	4
A list of the actions in detail and who is responsible for carrying them out		X	X	X	X	X	4
A description of what will trigger this further action/additional measures, such as:							
<ul style="list-style-type: none"> the results of planned routine checks/inspections/surveys on site 	X						6
<ul style="list-style-type: none"> the results of on-site measurements of process parameters and surrogate measurements for odour (e.g. pH, temperature, oxygen, etc) exceeding defined trigger levels; 	X		X				6
<ul style="list-style-type: none"> other metrics, such as particular meteorological conditions (e.g. temperature above a certain value, wind blowing in a particular direction, or calms); and 	X		X			X	6
<ul style="list-style-type: none"> odour monitoring on- and/or off-site, including: 	X		X				6

Good-practice OMP requirement	EA final H4 (2011)	SEPA Odour Guidance 2010	Defra Odour Guidance for LAs (2010)	Defra Composting Good Practice for LAs (2009)	Defra CoP on Odour from STWs (2006)	Sniffer OMP report for landfill Sites (2013)	Relevant section in this OMP
<ul style="list-style-type: none"> odour complaints monitoring (which shall be carried out for all sites); 	X		X				6
<ul style="list-style-type: none"> monitoring on-site showing non-compliance with any emission limit values (ELVs) set for controlled point source releases; and 	X	X	X	X			6
<ul style="list-style-type: none"> monitoring off-site showing non-compliance with any action levels for ambient odour levels (e.g. by sniff testing, odour diary surveys, etc). 	X		X				6
A description of:							
<ul style="list-style-type: none"> the roles and responsibilities of personnel on site (e.g. organisational chart); and 		X			X	X	7
<ul style="list-style-type: none"> the training and competence of staff in odour-critical roles 		X	X	X	X	X	7
<ul style="list-style-type: none"> Details of how the following will be carried out, and who has been assigned managerial and operational responsibilities for them: 							
<ul style="list-style-type: none"> implementing and maintaining the OMP; 			X	X	X	X	7
<ul style="list-style-type: none"> responding to odour-related incidents and any elevated odour levels from the aforementioned checks/inspections/surveys, monitoring, or on receipt of complaints of odour nuisance; including carrying out investigations and taking appropriate remedial action to prevent recurrence; 	X	X	X	X	X	X	7

Good-practice OMP requirement	EA final H4 (2011)	SEPA Odour Guidance 2010	Defra Odour Guidance for LAs (2010)	Defra Composting Good Practice for LAs (2009)	Defra CoP on Odour from STWs (2006)	Sniffer OMP report for landfill Sites (2013)	Relevant section in this OMP
<ul style="list-style-type: none"> planned maintenance and repair and the keeping of essential odour-critical spares; 		X	X	X	X	X	5
<ul style="list-style-type: none"> regular review (at least once per year) of the effectiveness of odour controls - including the OMP itself – taking account of complaints, monitoring results, inspections, surveys and other information and feedback received. This interval may be shorter if there have been complaints or relevant changes to your operations or infrastructure; 	X	X	X	X	X	X	7
<ul style="list-style-type: none"> community liaison - engaging with neighbours and communicating with relevant interested parties (e.g. local community and local authority) to provide necessary information and minimise their concerns and complaints, including methods used, content and frequency of communication; and 	X		X	X	X	X	7
<ul style="list-style-type: none"> keeping records of all activities and actions relating to odour and the OMP. 		X	X	X	X	X	6,7

2 Description of Site, Process Description and Odour Sources

2.1 This section of the OMP contains:

- Site overview – a description of the site function and layout, neighbouring communities and sensitive receptors;
- Process description – a description of the plant, operations and controls; and
- Odour source inventory – a summary of the main sources of odour, their locations and the materials/activities involved, and the characteristics of the odour sources (e.g. fugitive or controlled, point, area or volume, release height, likely odorous compounds, quantities likely to be released, pattern of release, method of control).

Site Location

2.2 The site is located within the administrative area of North Northamptonshire Council (formerly Corby Borough Council).

2.3 The site is located on the northeast outskirts of Corby, in a predominantly rural and industrial area. The area immediately surrounding the site largely comprises industrial sites and rural land with industrial and agricultural uses. The site location is shown in Figure 1.

Neighbouring Communities, Other Odour Sources and Sensitive Receptors

2.4 The site has commercial and light industrial premises to the west and south of the site. The nearest residential receptors are located approximately 750 m to the east of the site boundary. The area to the north of the EfW facility is largely agricultural with the exception of Rockingham Motor Speedway and Rockingham Building Business Centre. Corby town centre lies approximately 2.2 km to the southwest of the site.

2.5 The Agency provides guidance [7] on where more detailed consideration of odour impacts from certain waste treatment facilities would be required, based on the distance from the facility. The guidance states that more detailed consideration of odour impacts would be required where there are sensitive receptors within 250 m of composting facilities, so to be conservative the same distance rules will be applied to assess the sensitive receptors here. Defra's 2009 document "Good Practice and Regulatory Guidance on Composting and Odour Control for Local Authorities" states that: *"The provision of a sufficient buffer zone or set back distance between a compost plant and the nearest sensitive receptor is desirable. A sufficient set back distance provides*

emissions from the site with a zone in which residual odour from the site can dilute and disperse before reaching a receptor”.

- 2.6 Given the turn-around times of waste on the Corby EfW facility, and the lower odour potential of the residues from the EfW, the operations are expected to be significantly less odorous than composting activities. Nevertheless, a 250 m buffer from the site boundary is shown in Figure 1 and this can be considered to be a conservative radius of effect within which receptors may be affected by odour.
- 2.7 There are no high sensitivity receptors within the 250 m radius.
- 2.8 Regarding sensitive ecological sites, there are none within the vicinity of the site, and in any case flora and fauna of the habitat site are not expected to be sensitive to odour.
- 2.9 Meteorological data collected at Wittering, located approximately 17.1 km north-east of the Application Site, has been used to inform the prevailing weather conditions in compiling this OMP. The wind rose for Wittering, 2021 is shown in Figure 3.
- 2.10 Given that the predominant wind direction is south-westerly, as shown by the wind rose in Figure 3, the nearest residential receptors located 750 m to the east are considered to be located predominantly downwind of any odours emitted from Corby EfW.

Process Description and Site Layout

- 2.11 Key components of the proposed facility are labelled in Figure 2, including storage and waste processing locations and the flue stack.
- 2.12 Encyclis is currently applying for a permit to carry out the following activities at the Corby EfW facility:
- Acceptable waste will be transported by road to the EfW facility. The tipping hall will be enclosed with access via an automatic roller shutter door which will remain shut other than for access. The tipping floor will be concrete, suitable for HGVs and RCVs. It will be sloped in order to contain any spillages and ensure they are directed towards the waste bunker.
 - Wastes accepted at the facility will comprise residual non-hazardous municipal solid waste and commercial and industrial wastes.
 - The waste bunker will be designed to accept seven days waste in total. There will be a maximum of 5,100 tonnes of waste in the bunker at any one time. The waste bunker will be equipped with two cranes which are designed to allow 100% redundancy.
- 2.13 Waste will be combusted in a moving grate furnace with a nominal design feed-rate of 33.2 tonnes per hour and maximum feed rate of up to 45 tonnes per hour. The furnace will be designed to achieve a minimum temperature of 850°C for at least 2 seconds. White diesel will be used to start

- and shutdown the plant but once operating temperatures are reached, waste will normally be burned without the need for any auxiliary fuel.
- 2.14 Heat from the hot flue gases leaving the furnace will be recovered as steam. This steam will be used to generate electricity in a single steam turbine and generator. A small amount of electricity will be used to meet the parasitic load of the facility with the majority being distributed to the national grid. The EfW facility will be designed to minimise internal energy demand thereby maximising the amount of heat and power available for export. Although at the time of this application the facility is expected to generate electricity only, the EfW facility will be capable of combined heat and power (CHP) operation should a heat user be secured in the future.
- 2.15 Steam will be exhausted at low pressure from the turbine and condensed back into water. The water will then be pumped back into the boiler.
- 2.16 Back up burners fuelled by fuel oil will be in place. The burners will be automatically triggered to ensure that the minimum temperature of 850°C is maintained.
- 2.17 A flue gas treatment system will be provided to clean the gases prior to discharge. The abatement systems to be provided will include NO_x abatement using urea solution; acid gas abatement using hydrated lime, dioxins, furans and volatile heavy metals abatement using activated carbon and a bag filter for abatement of particulates (including particulate phase heavy metals).
- 2.18 Cleaned flue gases will be discharged from a 75 m high stack. Emissions from the stack will be monitored in line with the BAT requirements.
- 2.19 Under normal operation, there will be no process discharges to land, surface water, groundwater or sewer from the EfW facility. Where available, equipment certified to the EA monitoring standard will be used to carry out monitoring at the EfW facility.
- 2.20 All plant areas will be surfaced to an appropriate standard for the activities within that area. There will be limited liquids stored on site (fuel oil, ammonium hydroxide, boiler water treatment chemicals and maintenance oils) and all liquid tanks and drums will be provided with adequate bunding in line with industry best practice standards (i.e. sized to contain 110% of the tank/container contents and include blind drains). Materials selected for surfacing of process areas and bunds will be resistant to the materials they may come into contact with.
- 2.21 Any potential odours from storage of the waste materials will be extracted from above the storage bunker and used as combustion air within the furnace, thereby destroying any potentially odorous compounds. An activated carbon filter will be installed to control odours during a plant shut down. The carbon filter will have a dedicated emission point from the boiler hall roof. In the event of a full plant shutdown, waste volumes will be run down prior to the shutdown to minimise the amounts of material remaining in the bunker. Where possible, the shutdown will be timed to coincide with periods where the waste deliveries can be minimised. Doors to the tipping hall will remain closed at all times other than for access, which will be made via fast acting roller shutters.

- 2.22 The EfW facility will be designed to minimise freshwater consumption. This is achieved by maximising the re-use of process waters.
- 2.23 An inventory of raw materials will be implemented and maintained throughout the operational life of the EfW facility. The principal raw materials will be the incoming waste materials; in addition, the following reagents will be used:
 - ammonium hydroxide solution
 - hydrated lime
 - activated carbon
 - white diesel
 - water
 - boiler water treatment chemicals.
- 2.24 Use of reagents will be optimised during commissioning and controlled during operation. The main solid residues produced by the EfW facility will be:
 - bottom ash;
 - air pollution control residues;
- 2.25 Bottom ash will be combined with boiler ash. This will be sent offsite to a third-party ash processing plant for recovery. Air pollution control residues will be recirculated into the flue gas treatment process and any surplus transferred to a hazardous landfill for disposal.
- 2.26 The quantity of wastes generated from the EfW facility will be monitored. Further monitoring and reporting of bottom ash and air pollution control residues will be carried out in accordance with the requirements of the environmental permit.
- 2.27 An advanced control systems will be included to provide automatic control of the EfW process to ensure that the EfW facility is controlled within the design parameters.
- 2.28 The EfW facility will be designed for safe operation both under normal, abnormal and emergency conditions. The design process will be subject to a hazard study process which aims to remove hazards through the plant design where possible. Prior to operation an accident management plan will be in place and this system will be reviewed and maintained.
- 2.29 The maximum permitted throughput is limited to circa 357,408 tonnes per annum.
- 2.30 The types of waste accepted at the site are included below in [Table 2.1](#):

Table 2.1: European Waste Codes (EWC) Accepted at Site

Waste Code	Description
02	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing and food preparation and processing

Waste Code	Description
	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
	02 01 03 Plant-tissue waste
	02 01 04 Waste plastics (except packaging)
	02 01 10 Waste metal
	Wastes from the preparation and processing of meat – fish and other foods of animal origin
	02 02 03 Materials unsuitable for consumption or processing
	Wastes from the baking and confectionary industry
03	Wastes from wood processing and the production of panels and furniture, pulp, paper and cardboard
	Wastes from wood processing and the production of panels and furniture
	03 01 01 Waste bark and cork
	03 01 05 Sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
	Wastes from pulp, paper and cardboard production and processing
	03 03 07 Mechanically separated rejects from pulping of wastepaper and cardboard 03 03 08 Wastes from sorting of paper and cardboard destined for recycling
04	Wastes from the leather, fur and textile industries
	Wastes from the textile industry
	04 02 10 Organic matter from natural products (for example grease, wax)
	04 02 21 Wastes from unprocessed textile fibres
	04 02 22 Wastes from processed textile fibres
15	Waste packaging; absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
	Waste packaging (including separately collected municipal packaging waste)
	15 01 01 Paper and cardboard packaging
	15 01 03 Wooden packaging
	15 01 04 Metallic packaging
	15 01 05 Composite packaging
	15 01 06 Mixed packaging
	15 01 09 Textile packaging
17	Construction and demolition waste (including excavated soil from contaminated sites).
	Wood, glass and plastic
	17 02 01 Wood
18	Wastes from human or animal health care and/or related research (except kitchen and restaurant wastes not arising from immediate health care)
	Wastes from natal care, diagnosis, treatment or prevention of disease in humans
	18 01 04 Wastes whose collection and disposal is not subject to special requirements in order to prevent infection (for example dressings, plaster casts, linen, disposable clothing, diapers)
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
	Wastes from physico/chemical treatment of waste
	19 02 03 Premixed wastes composed only of non-hazardous wastes
	Wastes from aerobic treatment of solid wastes

Waste Code	Description	
19 05 01	Non-composted fraction of municipal and similar wastes	
19 05 02	Non-composted fraction of animal and vegetable waste	
19 05 03	Off-specification compost	
Wastes from anaerobic treatment of waste		
19 06 04	Digestate from the anaerobic treatment of municipal waste	
19 06 06	Digestate from anaerobic treatment of animal and vegetable waste	
Wastes from the mechanical treatment of waste		
19 12 01	Paper and cardboard (only if contaminated and unsuitable for recycling at the paper mill)	
19 12 07	Wood not containing dangerous substances	
19 12 08	Textiles	
19 12 10	Combustible waste (refuse derived fuel)	
19 12 12	Other wastes from mechanical treatment of wastes not containing dangerous substances	
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions	
	Separately collected fractions (except 15 01)	
	20 01 01	Paper and cardboard
	20 01 10	Clothes
	20 01 11	Textiles
	20 01 38	Wood other than that containing dangerous substances
	20 01 39	Plastics
	Garden and park wastes (including cemetery waste)	
	20 02 01	Biodegradable waste
	Other municipal wastes	
	20 03 01	Mixed municipal waste
	20 03 02	Waste from markets
	20 03 06	Waste from sewage cleaning
20 03 07	Bulky waste	

Odour Sources on Site

Generation of Odours at the Facility

2.31 The main potential source of odour at the Corby EfW facility is associated with the incoming waste and its storage. Waste will be transported to the site in covered vehicles and stored in the tipping hall which will be enclosed with access via an automatic roller shutter door. The greatest potential for odour is therefore from the vehicle entering the site and fugitive odour from the tipping hall when the door is open for access. There is also the potential for odour emissions from the stack although this is unlikely. This is discussed in more detail in the following section.

Odour Source Inventory

2.32 [Table 2.2](#) on the following page lists the Odour Source Inventory for the facility. It provides a summary of the main sources of odour, their locations and the materials/activities involved, and

the characteristics of the odour sources (e.g. fugitive or controlled, point, area or volume, release height, likely odorous compounds, quantities likely to be released, pattern of release and method of control). The odour potential of the various wastes stored and processed at the site has been estimated and rated on a scale from 1 – no odour risk, to 5 – strong odour risk. The residual odour potential following implementation of odour control measures has also been estimated on the same scale.

Table 2.2: Odour Source Emissions Inventory

Location	Source	Type of emissions	Likely odorous compounds	Means of control	Description of Release	Characteristics of Release	Estimated Odour Potential of Materials (1-5)	Estimated Source Odour Potential After Control Measures (1-5)
Site access road and internal roadways	Incoming loads of materials	Fugitive to outside air	Municipal waste type odours	Measures to control odour at source listed in Section 3 (including waste acceptance/removal procedures and enclosed/covered vehicles)	Vehicle paths along the access road (fugitive line source)	Close to ground level intermittent release, at ambient temperature	3	2
Tipping Hall	Temporary tipping and storage of waste materials in the bunker for up to five days	Fugitive emission to outside air	Municipal waste type odours	<p>Tipping and storage will be enclosed within the building. An automatic door will keep the area enclosed</p> <p>Waste will be stored for less than 5 days.</p> <p>Air for the plant within the building will create a slight negative pressure ensuring that airflow and, therefore, odours are likely to be directed into rather than out of the building</p>	Release through the automatic door (fugitive area sources)	Close to ground level, intermittent release, at ambient temperature	3	2

ODOUR MANAGEMENT PLAN

Location	Source	Type of emissions	Likely odorous compounds	Means of control	Description of Release	Characteristics of Release	Estimated Odour Potential of Materials (1-5)	Estimated Source Odour Potential After Control Measures (1-5)
				Waste will be mixed by crane to prevent anaerobic conditions and generation of odours.				
Furnace	Waste incineration	Fugitive to outside air	Municipal waste type odours	Incineration will occur within building and high temperatures during incineration will reduce odour.	Odour will be destroyed through incineration process or dissipated through stack (point source)	The stack will be high enough for the plume dissipate before it reaches ground level.	1	1

3 Odour Control During Normal Operation

3.1 This section of the OMP describes how the Corby EfW Facility will control odour impacts from normal operations. A great deal can be done to minimise the quantities of odours at site or to minimise their release by good working practices and process control; whereas it is much more difficult to improve atmospheric dispersion. Therefore, the proposed facility works in accordance with the accepted hierarchy of preferred controls, that is:

- prevent formation/release of odour in the first place;
- where this is not practicable, minimise the release of odour;
- abate excessive emissions; then
- dilute any residual odour by effective dispersion in the atmosphere.

Good Working Practices/Housekeeping Measures to Minimise Odour Releases

3.2 Waste acceptance procedure for all incoming loads is as follows:

- Acceptable waste will be delivered to the facility in covered or enclosed vehicles. After the weighing process, the vehicle will be directed into the enclosed tipping hall where it will be directed to a designated unloading bay and its load discharged into the waste bunker. Unacceptable waste will be rejected.
- Waste deliveries will only be accepted from authorised carriers and all heavy goods vehicles entering the site will report to the weighbridge gatehouse before being allowed to enter the site. Details of all waste entering the facility will be recorded in a tracking system.
- Deliveries will be scheduled to reduce build-up of waste on site.

3.3 All deliveries, handling and storage will be undertaken in a fully closed environment to reduce fugitive odour. Access to and from the tipping hall and bunker for waste delivery will be via a single entrance fitted with a fast-acting door which will remain closed during non-delivery periods.

3.4 Acceptable waste will be stored for no longer than 5 days in the bunker and any malodorous waste will either be incinerated as soon as practicably possible or not be accepted. Waste will be processed on a first in first out basis as far as practical.

3.5 To reduce odour from the waste bunker, waste storage will be periodically mixed by the overhead crane, to reduce anaerobic conditions developing and the subsequent generation of odour.

- 3.6 Defra published a “Review of Environmental and Health Effects of Waste Management” (Defra, 2004). This publication included a literature review, which revealed that odour is potentially significant from the waste storage and processing phases of incineration, but that odours are normally controlled via the combustion air. Combustion air for the plant will be drawn from above the bunker creating a slight negative pressure ensuring that airflow and, therefore, odours are likely to be directed into rather than out of the building. The height of the stack and the destruction of odours during the incineration process are sufficient to ensure that it is unlikely that odours from the stack will be detectable at ground level.
- 3.7 No putrescible materials will be stored within the bunker.
- 3.8 Procedures will be established to ensure a high standard of housekeeping is maintained. Cleaning routines will be established which will include periodic washing within the Tipping Hall area.
- 3.9 If noticeable odour is perceived, this shall be recorded on a Site Inspection Sheet, then the offending waste will be removed from site as soon as possible
- 3.10 Any issues relating to the fugitive emissions associated with the operation of the facility will be recorded in the site diary, along with any corrective and preventative actions taken by site staff.

4 Odour Control During Maintenance and Abnormal Events

- 4.1 This section of the OMP deals with the management and control of odours during maintenance and emergency periods. It establishes an action plan for abnormal event scenarios (including emergencies, maintenance, breakdowns, weather anomalies, etc). This is a summary of the foreseeable situations that may compromise the operator's ability to prevent and/or minimise odorous releases from the process and the actions to be taken to minimise the impact. The action plan is intended to be used by operational staff on a day-to-day basis.
- 4.2 For foreseeable abnormal events, the following pages, a tabular risk assessment ([Table 4.1](#)) has been compiled, which:
- identifies the conditions under which abnormal operational conditions or failures might arise;
 - describes what these are;
 - summarises the potential impacts from the identified abnormal/failure situations and assesses the degree of those impacts; and
 - describes how these conditions could be prevented and/or mitigated and controlled.
- 4.3 It is recognised that indicative BAT as specified in the EU BAT Reference document⁸ is to make provision for the control of odour when the EfW facility is not operating, by avoiding fuel storage overload and/ or the use of an alternative odour control system.
- 4.4 During planned outages of the EfW, the volume of waste stored in the bunker will be reduced where possible. The facility will also have an activated carbon system with a discharge to air via the roof of the boiler hall. The odour abatement system will be operated:
- for periodic testing during normal plant operation to confirm the system is available; and
 - when there is waste in the bunker, the primary air fans are not in operation, and the operator is not preparing to start / re-start the incineration line. These periods are expected to be:
 - a. planned outages of the facility when there is waste in the bunker; and
 - b. unplanned outages/trips when the operator is not able to re-start the incineration process quickly.

Table 4.1: Abnormal operations and failures that have the potential to affect the process and lead to the generation of odour

Identify the release point(s) and areas	Identify possible abnormal operation or failure that would lead to an odour event	What are the consequences of such an abnormal situation or failure	What measures should be in place to prevent or reduce the abnormal situation or failure	What actions should be taken and who will be responsible	What actions shall be taken if initial actions fail
Access Route at Facility	Accident involving delivery vehicle causing major spillage of materials	Uncontrolled release of odours from open area source – potential to lead to odour annoyance at sensitive receptors	Onsite traffic management, lights and speed restrictions to avoid spills and accidents Deliveries and transfer of sorted materials and residues in covered/enclosed vehicles	The Facilities Management Team will be responsible for negotiating a contingency plan in case of accident and/or spillage.	Plant manager to initiate accident response plan – delivery vehicle made safe Spilt materials and debris immediately collected and transferred into the waste bunker Spill area then swept.

Identify the release point(s) and areas	Identify possible abnormal operation or failure that would lead to an odour event	What are the consequences of such an abnormal situation or failure	What measures should be in place to prevent or reduce the abnormal situation or failure	What actions should be taken and who will be responsible	What actions shall be taken if initial actions fail
Tipping Hall/Bunker	Failure of automatic door	Fugitive releases of odorous emissions—potential to lead to odour annoyance at sensitive receptors	Routine maintenance will reduce chances of the failure of the automatic door. Unavailability of EfW facilities due to failure of the automatic door could result in waste remaining within (enclosed/covered) delivery vehicles for a longer period.	Facilities Management Team will consider rerouting deliveries as appropriate.	If unplanned shutdown occurs and the automatic door has failed, the facility shall operate the door manually. If there is a problem with any of the equipment or machinery, the plant manager will ensure that it is replaced, repaired or rearranged as quickly as possible
	Material not processed within the planned maximum storage period	Potential for fugitive odorous emissions—may cause odour to be detected at nearby sensitive receptors	Delivery schedules will be adjusted to reduce waste build-up within the bunker. Unavailability of EfW facility due to shutdown/accident could result in waste remaining on site for a longer period however this will be mitigated by operating the odour abatement.	If there is a build up of waste which exceeds the planned storage period, this will be incinerated as soon as practicably possible if the EfW is operational.	If there is a problem with any of the equipment/machinery, the plant manager will ensure that it is replaced, repaired or rearranged as quickly as possible Routine maintenance of plant will reduce mechanical and electrical issues which may prevent waste from being processed. Consideration will be given to diverting material to alternative disposal facilities where required.

Identify the release point(s) and areas	Identify possible abnormal operation or failure that would lead to an odour event	What are the consequences of such an abnormal situation or failure	What measures should be in place to prevent or reduce the abnormal situation or failure	What actions should be taken and who will be responsible	What actions shall be taken if initial actions fail
	Extended period (>3 days) of very hot weather (>25 °C) forecast or experienced	Higher than normal decomposition rates of waste residues and enhanced odour emissions	The Facilities Management Team will monitor weather conditions and forecasts and take additional measures to ensure that wastes identified as malodorous are prioritised for combustion.	The Facilities Management Team will monitor weather and forecasts to anticipate extended hot spells. Plant manager to check for odorous wastes during the daily site inspection and arrange for removal as soon as practicably possible	If odours are experienced from hot weather, offending waste shall be prioritised for combustion or removed from site as soon as practicably possible.
	Delivery of particularly malodorous materials	Potential for odorous emissions to the open air which may cause odour to be detected at nearby sensitive receptors	Highly odorous waste to be rejected prior to offloading if still within the delivery vehicle as part of the waste pre-acceptance/acceptance procedures.	If highly odorous waste is found within the bunker, it will be prioritised for incineration (within 24 hours)	If odorous waste has been left on site more than 24 hours then arrangements will be made for the removal of this waste as soon as practicably possible.

Identify the release point(s) and areas	Identify possible abnormal operation or failure that would lead to an odour event	What are the consequences of such an abnormal situation or failure	What measures should be in place to prevent or reduce the abnormal situation or failure	What actions should be taken and who will be responsible	What actions shall be taken if initial actions fail
Boiler House	Unplanned shutdown (due to mechanical failure or power outage)	Fugitive releases of odorous emissions—potential to lead to odour annoyance at sensitive receptors	In the event of an unplanned shutdown, the activated carbon odour abatement system will be operational. Routine plant maintenance for critical plant will reduce chances of an unplanned shutdown.	Operator ensures that odour abatement system is operating as set out in Operational Monitoring Procedure for Odour Abatement System.	If unplanned shutdown occurs and the odour abatement system has failed the facility shall stop accepting waste until power resumes, sending it instead to source or another facility. This is unlikely as the odour abatement system will be periodically tested during normal plant operation to ensure the system is available.

5 Routine Maintenance and Inspection

5.1 This section of the OMP describes how the Facilities Management Team will address the following issues to help maintain the effectiveness of odour controls:

- site performance; and
- planned inspection and maintenance.

5.2 Planned maintenance and inspection is crucial to maintaining the effectiveness of odour control measures. The Corby EfW facility will ensure the good performance of all plant and equipment. An effective, planned inspection and preventative maintenance programme is employed on all odour-critical plant and equipment. This includes:

- a written maintenance programme; and
- a record of maintenance.

Maintenance of Site and Equipment

5.3 The plant manager and designated supervisors will be trained to ensure they fully understand and are able to implement and understand the responsibilities for maintenance, defect reporting and rectification on plant and infrastructure

5.4 A daily visual inspection will be undertaken where 'maintenance of all equipment in good condition?' and 'Are there any maintenance requirements?' will be considered.

5.5 All plant and equipment will be maintained in accordance with the manufacturer's recommendations. Some plant/equipment may be maintained more frequently if operational experience dictates this is required. The frequency of maintenance will be set out within the planned maintenance programme.

5.6 Key plant for odour mitigation will include but will not be limited to:

- automatic door: and
- an activated carbon filter that will be used to abate air from above the bunker during a shutdown and will have release point from the building roof.

6 Routine Monitoring, Recording and Reporting

- 6.1 Monitoring has an important role to play in assessing the effectiveness of operational practices to prevent and contain odours; and in assessing the nature and extent of an odour problem should it arise.
- 6.2 This section of the OMP describes how the effectiveness of operational practices and controls will be checked by:
- monitoring of changes on site; and
 - monitoring of effects off site (at the site boundary and beyond).

Monitoring of Odour Emissions at Source

- 6.3 In the widest sense, the term 'monitoring' can include both emissions monitoring of odour (or a surrogate parameter) and inspections of the process, buildings and equipment to check that emissions are being contained and controlled to meet the accepted standards of good practice in relevant guidance. Although there is one flue stack, the height of the stack and the destruction of odours during the incineration process will be sufficient to ensure that it is unlikely that odours from the stack shall be detectable at ground level therefore no monitoring of odour emissions at source will be required. Monitoring of odour at the boundary or at receptors is described below.

Monitoring of Odour at the Site Boundary and Sensitive Receptors

General Approach to Site Monitoring

- 6.4 The plant manager will be responsible for monitoring odour levels at the site boundary and sensitive receptors, a list of these receptors and their grid coordinates is provided in [Table 6.1](#). Odours will be monitored using sniff tests in accordance with either the protocol in EA guidance H4, or the method in the IAQM guidance on the Assessment of Odour for Planning.

Table 6.1: Sensitive Receptors

ID	Description	National Grid Reference	
		X(m)	Y(m)
R1	Brookfield	490528	291829
R2	Weldon Lodge	491738	291528
R3	Priors Hall Development/ Corby Business Academy	492236	290908
R4	Barnwell Gardens	492336	290549
R5	4 Larratt Road	492117	289813
R6	143 Corby Road	491735	289534
R7	86 Weldon Road	490111	288904
R8	79 Turnwell Lane	489744	289108
R9	73 Pen Green Lane	489483	290118

- 6.5 Site inspections will be conducted and recorded when the site is open on an inspection sheet retained. The results will be recorded on the ‘Odour report form’ in *Environment Agency – How to comply with your permit – H4 Odour Management* and will include the date and time of the sniff test, the weather conditions, intensity of the odour, duration, constant/intermittent, type of smell, likely source and comments.
- 6.6 If a strong or very strong odour intensity (an average of level 4 or 5) is recorded at a receptor, the sniff test will be repeated an hour later. If the odour persists at the same intensity or higher, all non-essential site work will cease until the source of the odour is identified and the issue is rectified such that the average odour intensity reduces to below level 4.
- 6.7 If an extremely strong odour intensity (an average of level 6) is recorded at a receptor, all non-essential site work will cease until the source of the odour is identified and the issue is rectified such that the average odour intensity reduces to below level 4.

Complaints Monitoring

- 6.8 Quite separate from the procedural response to a received complaint (covered later in section 7) is the monitoring of complaints levels. Reliable complaints should be considered a form of monitoring and complaints shall be treated as if they were monitoring data.
- 6.9 Complaints are a very important indicator of community dissatisfaction (although not the only one) and the technique of complaints monitoring is a powerful tool. However, it is important to bear in mind that complaints are only a symptom of annoyance or nuisance; there are various reasons why complaint level is not an exact indicator of odour annoyance or nuisance itself. Nevertheless, the collection, maintenance and analysis of complaints records is an important method of indicating the effectiveness or otherwise of measures implemented to reduce nuisance due to odour.

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- 6.10 Corby EfW will implement a system of complaints monitoring and analysis. Complaints are collected, registered and validated as described in Section 7 of this OMP. The record of complaints received at the end of each calendar quarter will be reviewed with a view to identifying:
- trends, in terms of the subject, cause or origin of complaints; and
 - aspects experienced at one location that could apply to other locations.
- 6.11 Any action deemed necessary as a result of the analysis shall be identified and discussed in order to programme a course of corrective actions.

Recording of Results, Reporting and Actions

- 6.12 Site inspections will be conducted and recorded on an inspection sheet and retained.
- 6.13 Any records required to be submitted will be supplied to the Environment Agency within 14 days where the records have been requested in writing by the Agency.
- 6.14 The Environment Agency will be notified following the detection of any malfunction, breakdown or failure of odour-critical equipment or techniques, accident or fugitive emission which has caused, is causing or may cause significant odour annoyance.

Actions in the Event of Abnormal Emissions

- 6.15 The Environment Agency states that emissions from the activities shall be free from odour at levels likely to cause annoyance outside the site, as perceived by an authorised officer of the Agency, unless the permit holder has used appropriate measures to prevent or where that is not predictable, to minimise, the odour.
- 6.16 In the event of abnormal emissions (e.g. olfactory inspections, verified complaints, or monitoring beyond the site boundary), the Plant manager will take the following actions:
- Unavailability of disposal facilities could result in waste remaining on site for longer than usual and could result in odour generation. However, this will be mitigated by managing the amount of waste on site, reducing deliveries if required.
 - Hot weather has not usually been found to create significant odour production increases, but this will be monitored by the plant manager and if a load was identified as being odorous, then they will organise for the load to be removed as soon as practicably possible.
 - The plant manager will use intermittent deodorising sprays in the Tipping Hall during hot weather.
 - Mixing of the waste will occur to prevent anaerobic conditions and subsequent generation of odours.

7 Management Controls

7.1 This section of the OMP provides information on:

- staffing responsibilities;
- staff training;
- complaint management, investigation and resolution procedures;
- provision of a complaints telephone line; and
- communications with external stakeholders.

Roles and Responsibilities

7.2 The Facilities Management Team is committed to effectively managing the impacts of any odours from the Corby EfW Facility. This commitment extends from policies produced at the top level, to the resources available to the competent personnel, to the abilities of the personnel managing odour-critical work tasks. This section describes the responsibility for the management and operation of the Corby EfW.

7.3 The Facilities Management Team will appoint managers with the executive authority and responsibility for implementing the Management System. Work instructions, job descriptions and procedures will exist for the critical areas of the Company's activity and will be issued or made available to personnel responsible for undertaking these tasks.

7.4 The Facilities Management Team will have a documented management structure for managing the impacts of odour from the Corby EfW facility. The facility and its operations will be under the direct supervision of a nominated Technically Competent Manager by the permit holder. The Technically Competent Manager will be qualified by means of holding a Certificate of Technical Competence or Operator Competence Certificate issued by WAMITAB or another awarding body relevant to the site.

7.5 The Facilities Management Team will be responsible for the following tasks:

- implementing and maintaining the OMP;
- responding to odour-related incidents and any elevated odour levels from the aforementioned checks/inspections/surveys, monitoring, or on receipt of complaints of odour nuisance; including carrying out investigations and taking appropriate remedial action to prevent recurrence;
- keeping records of all activities and actions relating to odour and the OMP.
- planned maintenance and repair and the keeping of essential odour-critical spares;

ODOUR MANAGEMENT PLAN

- regular review (at least once per year) of the effectiveness of odour controls - including the OMP itself - taking account of complaints, monitoring results, inspections, surveys and other information and feedback received. This interval may be shorter if there have been complaints or relevant changes to your operations or infrastructure;
 - engaging with neighbours close to the site and communicating with relevant interested parties (e.g. local community and local authority) to provide necessary information and minimise their concerns and complaints, including methods used, content and frequency of communication.
- 7.6 All site staff will be subject to training that includes their individual requirements to check waste material acceptance of the site (as detailed in Section 3) and their responsibility to inform the plant manager of any specific issues.
- 7.7 Where a site operative becomes aware of a potential odour release from the site it must be reported to the plant manager as soon as practical. It will be the responsibility of the plant manager to resolve any potential odour issues. Any complaints or issues relating to the surrounding land use will be directed to the plant manager for dialogue and a suitable conclusion.
- 7.8 The plant manager will review all control measures in place in the event that an odorous emission is substantiated off site. Any control measures seen to be failing following a review will have new controls agreed and implemented.

Training and Competence

General Procedures for Training and Competency of Staff

- 7.9 The company will identify training requirements of its employees and provides suitable resources to ensure they have the required knowledge, skills and expertise to carry out their duties. This includes their roles and responsibilities in complying with the policy statements and all relevant legislation. This will be achieved through induction training for new employees and specific training as required. Contractors and all persons performing tasks on behalf of the Company will be made aware of the policy and relevant requirements and will be competent in the roles undertaken.
- 7.10 All the Corby EfW personnel will receive ongoing training based upon identified needs; any staff deficient in knowledge and understanding of this procedure will be nominated for additional training.
- 7.11 All employees will be required to be familiar with the Environmental Controls and Emergency Procedures required on site. All employees will be made fully aware of the need to be constantly vigilant with regard to site odour control and management procedures.

Training and Competency of Operational Staff at the Corby ERF Facility

- 7.12 Staff responsible for the operation, maintenance or repair of the facility will be trained and competent. Records will be maintained (documented training records) demonstrating compliance with this. In order to minimise risk of emissions, particular emphasis will be given during training to:
- awareness of their responsibilities for avoiding odour nuisance;
 - identifying waste types which are permitted for acceptance at the site under the site's Environmental Permit (listed in the [Table 2.2](#)) and those wastes which are not;
 - identifying appropriate storage areas for different wastes and recognising storage limits;
 - quarantine and removal procedures for malodourous waste;
 - minimising emissions on start-up and shut-down; and
 - actions to minimise emissions during abnormal conditions.
- 7.13 A statement of training requirements for each operational post will be maintained and a record of the training received by each person whose actions may have an impact on the environment will be kept.
- 7.14 Management staff will review and update their training as necessary and will review staff training systems at the facility.
- 7.15 All training will be controlled and monitored via a computerised database.

Complaints Handling and Communications

- 7.16 The Facilities Management Team will develop a comprehensive system of monitoring and inspection to check odour control measures are functioning effectively at the Corby EfW facility. However, in the event that an odour complaint is received, it is important that complaints are properly and systematically dealt with and acted upon.
- 7.17 Complaints handling will be managed in accordance with the complaints procedure developed in the EMS document.
- 7.18 The complaints procedure will set out the following:
- How the Facilities Management will respond to any odour complaint;
 - How the Facilities Management will investigate any odour complaints, take the appropriate steps and actions, and keep stakeholders informed; and
 - How the Facilities Management will communicate to appropriate bodies routinely and in response to any incidents or planned maintenance.

- Recording of the complaint.

Communicating with External Stakeholders

7.19 The EA will be notified following the detection of any malfunction, breakdown or failure of equipment or techniques, accident or fugitive emission which has caused, is causing or may cause significant odour.

OMP Updating and Review

7.20 The plant manager will be responsible for maintaining, updating and reviewing the OMP.

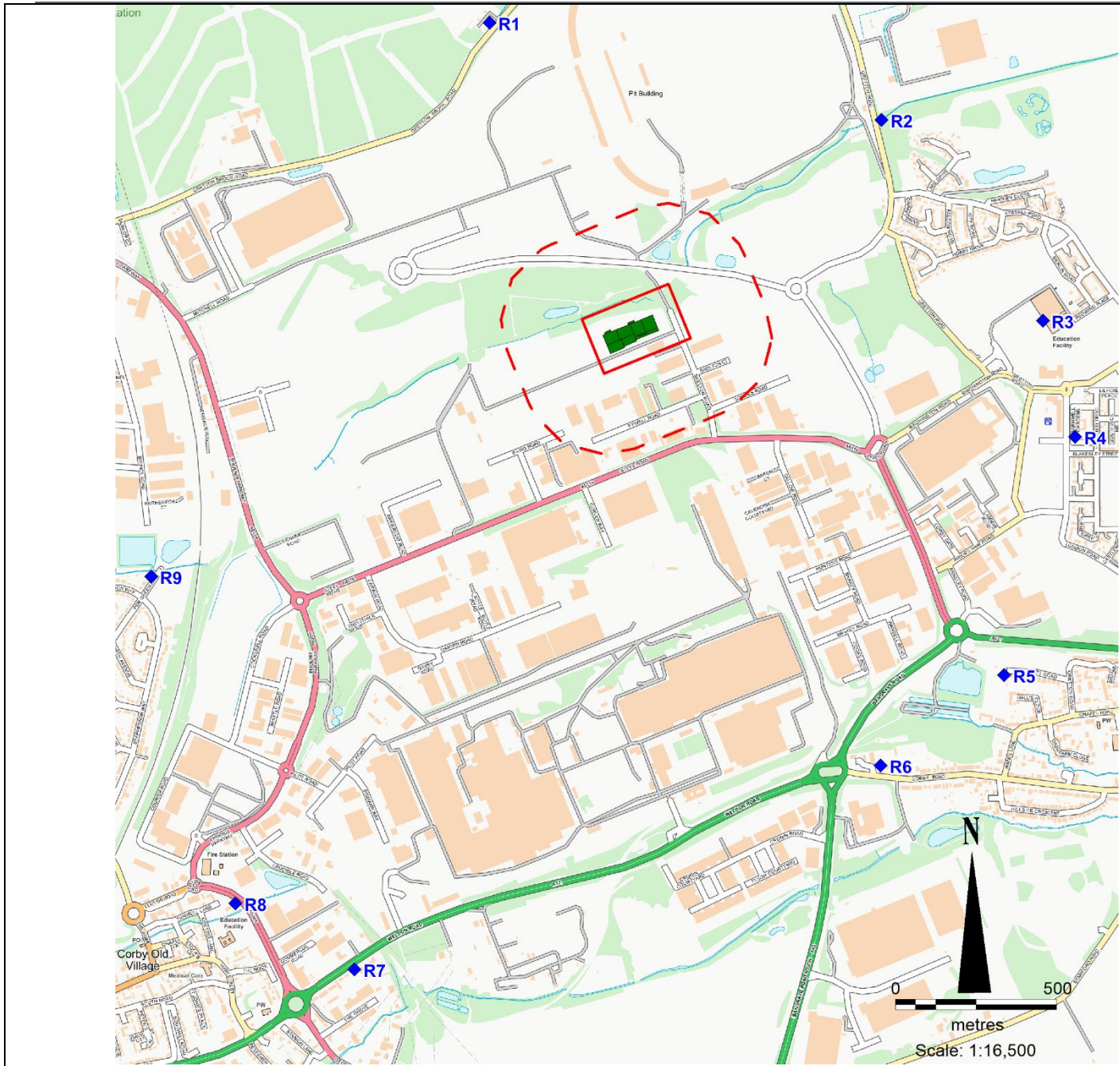
7.21 The EA will be provided reasonable access to audit the implementation of the OMP, complaints records and records of Corby EfW compliance with the OMP.

7.22 The OMP will form part of the EMS and therefore be subject to review and revision according to the needs of the EMS.

7.23 The Facilities Management Team shall provide for improvements in management practice and organisation, to allow the OMP to be a living document, whereby changes to site, equipment and practices that improve the operation of the facility and do not detract from overall environment performance, are not unduly delayed or hindered.

7.24 Save for reformatting, Sections 6 and 7, on monitoring and management respectively, will not be altered without approval with the Environment Agency.

Figures



Legend

- Approximate Site Boundary
- Odour Buffer 250m
- ◆ Human Health Receptors
- Proposed Building Locations

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File location:

Date: 07/04/2022

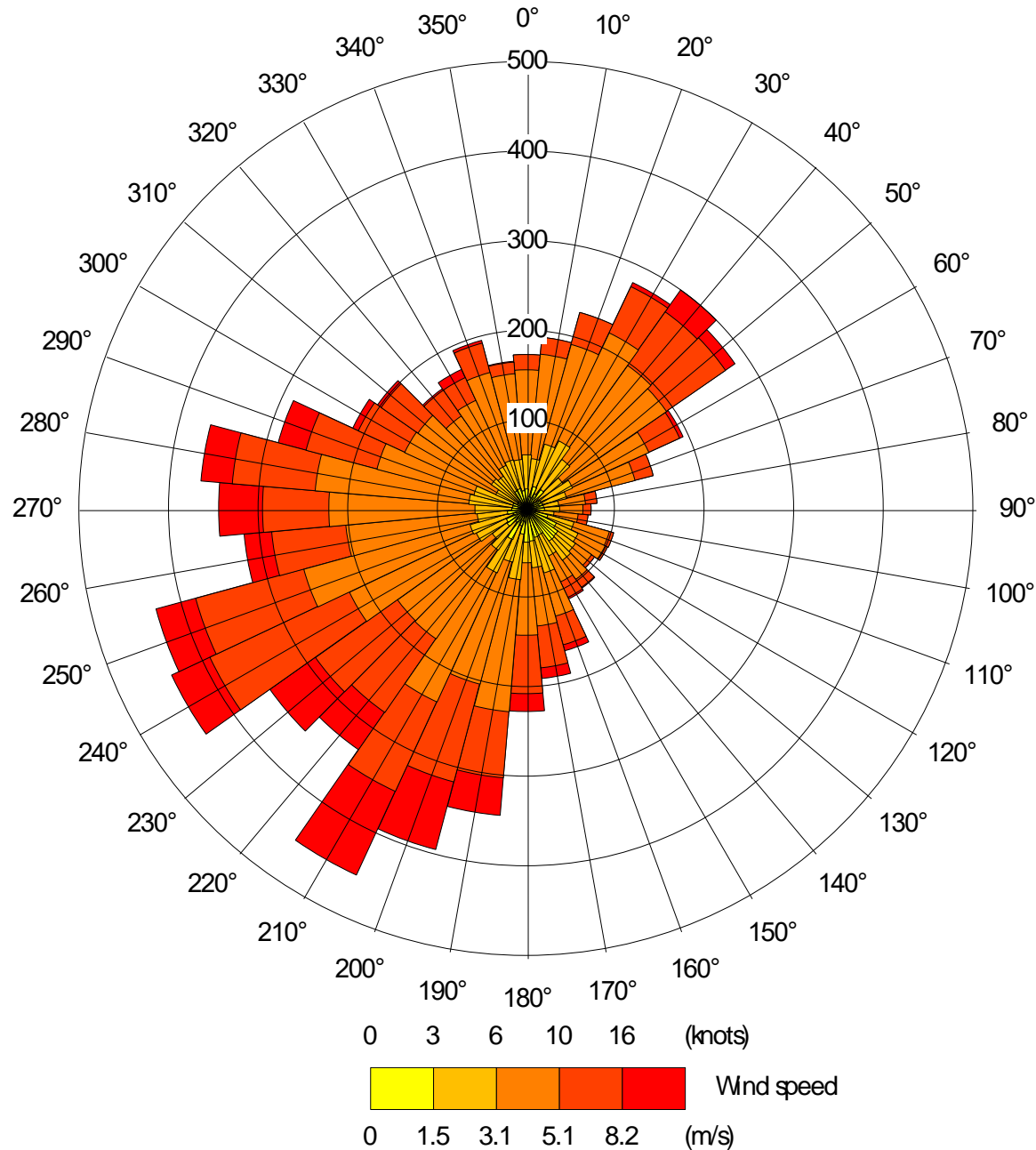
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Figure 1: Site Location and Receptors

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Figure 3: Wind Rose, Wittering 2021

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- 1 Environment Agency H4 Odour Management, March 2011.
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- 8 Commission Implementing Decision (EU) 2019/2010 of 12 November 2019 establishing the best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for waste incineration (notified under document C(2019) 7987)