



ODOUR MANAGEMENT PLAN

Think 3 E Consortium Ltd

Issue and Revision Record

Revision	Date	Originator	Description of Changes
V1	15/06/2026	J Hudson – Olive Compliance Ltd	Draft for Permit Application

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1 ODOUR MANAGEMENT PLAN

1.1 Introduction

This document has been prepared on behalf of Think 3E in support of an Environmental Permit Variation Application for their Treatment and transfer facility at their site in 15 – 21 Links Road, Wellingbrough, NN8 4EY

The document provides a structured framework and approach in effectively managing potential odour releases associated with the operations at the site.

This Odour Management Plan document (referred hereafter as the ‘OMP’) has been produced in accordance with the following documents:

- Environment Agency’s Technical Horizontal Guidance Note ‘H4: *Odour Management: How to comply with your permit*’; and
- General monitoring procedures detailed in Environment Agency guidance document Internal Guidance for the *Regulation of Odour at Waste Management Facilities*.

The purpose of this document is to outline the management control measures that have been established to prevent and control odour emissions and associated impacts from the site.

1.2 Structure of Odour Management Plan

The OMP has been structured in accordance with the EA H4 Odour Management Plan Guidance.

This OMP has been developed to clearly define the measures by which odour emissions will be controlled and prevented, namely by;

- Receipt and Management of Odorous Materials;
- Transfer of Odour Chemicals to Air;
- Containment of Contaminated Air;
- Treatment;
- Transport and Dispersion;
- Engaging your Neighbors;
- Response to Complaints;
- Ceasing or Reducing Operations; and
- Accident Management Plan.

The OMP considers the following aspects of the facility:

- Activities that have the potential to produce odour and sources of release;
- Actions to mitigate the effect of odour release (during normal and abnormal operations);
- Details of the sites monitoring regime;
- Details of responsible persons at the installation; and
- Potential outcomes of each failure scenario in respect to odour impact.

1.3 Status of the OMP

The OMP is a “live” document and will form part of the key environmental management document for the facility. All monitoring procedures, responsibilities and compliance actions will be updated as and when required.

Any revisions in the OMP or associated Appendix will be updated and inserted accordingly.

1.4 Responsibility for the Implementation of the OMP

The Operations Manager (also the TCM) is responsible for the OMP (Odour Management Plan), with shift Team Leaders serving as the deputy of the plan. The OMP is reviewed once a year but the compliance team to ensure it remains effective and up-to-date.

The Operations Manager has provided the necessary training to ensure staff are competent in implementing and reviewing the plan.

Effective communication is emphasised to maintain readiness, and additional refresher Toolbox talks undertaken throughout the year to the shifts.

Relevant operational staff are trained upon their induction and mandatory training upon the start of their employment, with training reviews undertaken by the management team undertaken throughout the year as part of their personal training plans.

2 SITE BACKGROUND

2.1 Site Setting

The site is located at 15 – 21 Links Road, Wellingbrough, NN8 4EY

The facility is permitted by the Environment Agency as a Hazardous Waste Transfer Station and is operated in accordance with the Environmental Permitting (England and Wales) Regulations 2018 (as amended).

The site is located within Links Industrial Estate with main railway line and sidings to the east, and industrial estate to the North, South and East. The site is roughly rectangular in shape and extends in area to approximately 5.3 ha.

The site is located predominantly within an industrial setting, with the nearest residential properties over 1km away from the site on the opposite side of the Mainline Railway and sidings located approximately 1.2km m to the southwest.

Hovis Flour Mill is directly adjacent to the site on the southwest boundary.

Within 10km of the site there are no national and internationally designated sites of ecological importance.

With this in mind the site is not considered to be overly sensitive in relation to potential pest and vermin impacts. Details pertaining to potential receptors would be limited to immediate neighboring Industrial units & businesses.

2.2 Facility and Process Overview

The site is made up of the existing site containing large buildings 1-11. The additional site adjacent has been purchased and the site offers additional buildings and fully contained impermeable bunded yard.

The facility operate a logistics transport facility and they service customers such as supermarket chains, the company bring materials back to the Think3E facility from stores for storage (in regards to shelving and display changes and café equipment) Much of this equipment is stored and then reused at a later date. However some of the materials are discarded at a later date and become waste.

T3E also bring back return loads of waste baled plastics and cardboard, or out of date good (food and non-perishables), returns and broken stock. - these materials usually come in via curtain sidings within stillages.

The materials in the curtain sidings are removed and routed to the designated area on site depending on what it is.

Food Waste is sent to building 4. Perishable material is de-packaged and loaded into a bulk trailer inside building 4. When full the trailer is moved into the yard and covered. The bulk trailer is then sent out to an AD facility. This activity is usually undertaken within 24hrs but is completed within 72hrs maximum.

None perishable dry goods/ material is stored for further processing in shed 3, 9, 12,13,14,15

Plastics are received in bales – these are split in shed 1 and re baled the bales are then stored in sheds 10,11,6,7 and stockpiled to form bulk loads and are then sent out for further reprocessing this is as part of a supply contract.

Card is received and baled in shed 1 and shed 2 - the bales are then stored in the canopy areas or in sheds 10,11,6,7 and stockpiled to form bulk loads and are then sent out for further reprocessing this is as part of a supply contract.

Think 3E also have customers who supply food wastes (which is egg shells and bread only) in barrels that are de-packaged and bulked up and sent out to an AD facility (this activity is done within 72 hrs for perishable items). This takes place in building the barrel wash Anderson shelter where the material is bulked up into a bulk trailer is then sent out to an AD facility .

The main potential odour risk comes from the unloading, storage and handling of food waste within the building and from the bulk trailers when in the yard area. However, this is mitigated through the quick turn around of vehicle marshalling and building controls which ensure that the roller shutter doors remain closed at all times during unloading activities.

All site activities are performed by competent and trained individuals who are both suitably qualified and experienced.

The facility is operational 24/7 with operational staff implemented under a 4 shift pattern to ensure full operational capacity and staffing needs.

The site is currently receiving waste on an average of 2 load per hour, predominately between the hours of 7:00 to 16:00hrs. However, waste inputs vary based on incoming supply via return loads.

2.2 Competent Operator

All site activities will be performed by competent and trained individuals who are both suitably qualified and experienced.

All personnel employed on site are suitably trained and experienced at operating all plant and equipment associated with their particular role; especially with regard to the acceptance and handling (and associated rejection) procedures in the event that odorous materials are received on site.

On occasions where these competent and experienced personnel are off work or unable to perform their role, the most suitable replacement will be sourced from the available workforce and any relevant training will be administered before they perform the task.

2.3 Odour Impact Assessment

The following have been considered by the site as potential causes and sources of odour on site.

- Loading, unloading, and handling of wastes
- Waste acceptance
- Vehicle/Plant operations
- Waste processing turnaround
- Excessive volumes of waste
- Waste processing practice
- Poor housekeeping
- Inadequate site management or auditing
- Meteorological

2.4 On-site Odour Sources

Source Materials

The site can process 50,000 tonnes per annum. Plus additional exemption allowances.

The main potential odour risk comes from the unloading of waste within the building and bulking up and emptying the drummed food waste into the bulker.

However, this is mitigated through the acceptance into the building and treatment within 72 hrs (usually within 24) unloading activities are carried out in building.

For the drums of for take back materials . this is mitigated by the barrel containers from food outlets (contain bread and egg shells) usually get picked up from the producer within 72hrs of the waste being produced Therefore the risk of mal odour is low. The barrels are directed to the Anderson shelter/barrel wash area and are emptied directly into the bulk using forklift and barrel clamp and removed from site to AD within 24 hrs (72 hrs max) the barrels are then washed out and returned to the customer..

The specification of the incoming waste is shown in the Table 2.1 below:

Waste Type	Perishable	Potential for odour	Storage /Process time
Food Waste out of date or spoiled fresh/wet foods (ie from supermarket chains)	Yes	Yes	72hrs maximum but usually within 24 hrs.
Dry packaged goods, Glass jars of sauces and puddings, tinned food	No	No	Up to 12 weeks
Plastic bottles containing drinks	No	No	Up to 12 weeks
Milk cartons/plastic bottles.	Yes	Yes	72hrs maximum but usually within 24 hrs.
Food Waste from fast food	Yes	Yes	72hrs maximum but usually

chains – Comes in as sealed drums which are emptied and then washed out and returned to producer			within 24 hrs.
Plastic Waste from supermarkets – received as bailed waste or loose items stored in stillage cages	No	No	As defined in FPP for the site
Cardboard / dry packaging waste	No	No	As defined in FPP for the site
WEEE	No	No	As defined in FPP for the site

Releases

The potential odour releases from the facility are from the food waste this would be as a fugitive emission into the atmosphere.

This would result in a negligible impact at residential locations of over 1200m distance away, with predicted concentrations much less than the odour benchmark.

Off-site Odour Sources

The site is surrounded by neighbouring industrial processes which could potentially generate odour, namely the Hovis factory on the SW boundary, car spray garages, waste companies, food establishments etc.

Due to the site being located in a long-established industrial area where other activities contribute to background odours and approximately 1200m from the nearest residential area, the site is not considered to be located in an area overly sensitive to odour.

2.5 Nearest Sensitive Receptors

The Site is located predominantly within an industrial setting.

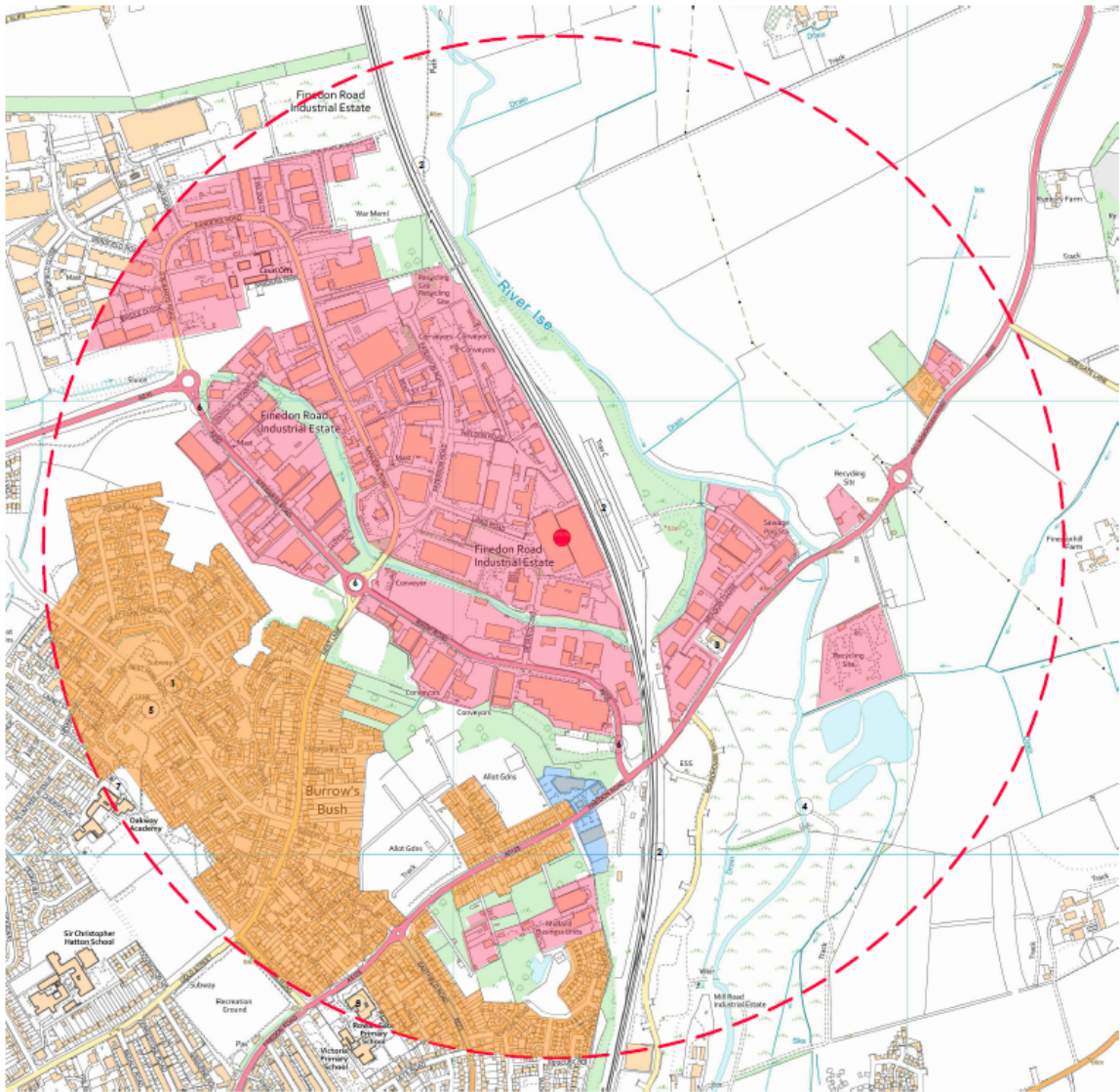
The site is located approximately 1200m from the nearest residential dwelling and is situated in a heavily industrialised environment where other activities contribute to background odours, as detailed above.

The location is therefore not considered overly sensitive to odour.

Receptor	Distance (m)	Contact Telephone Number	Advice
Cygnets Pre-School	Southwest 886m	01933 673882	Staff to contact via telephone to advise any occupiers to close windows and doors. Await further instruction from Emergency Services.
Rail Link	East 115m	East Midland Railway- 0845	Await further instruction from

		712 5678	Emergency Services.
Compass Church	South 85m	N/A	Staff to contact via telephone to advise any occupiers to close windows and doors. Await further instruction from Emergency Services.
Central Park	Southeast 990m	N/A	Await further instruction from Emergency Services.
Guillemot Park	Southwest 999m	N/A	Await further instruction from Emergency Services.
A510 Road	South 300m	Highways Agency 0300 123 5000	Await further instruction from Emergency Services.

Please refer to Figure 2.1 below which shows a site plan identifying the sensitive receptors.



NOTES

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LEGEND

● SITE

--- 1KM OFF SET BOUNDARY

RESIDENTIAL AREAS

INDUSTRIAL / INDUSTRIAL PARK

RETAIL / COMMERCIAL

1 CYGNETS PRE-SCHOOL

2 RAIL LINK

3 COMPASS CHURCH

4 CENTRAL PARK

5 GUILLEMOT PARK

6 ASTIG ROAD

7 OAKWAY ACADEMY

8 ROWAN GATE PRIMARY SCHOOL

N
W
E
S

SITE

THINK3E

1.5-21 LINKS RD, FINEDON ROAD INDUSTRIAL ESTATE, WELLINGBOROUGH

NNS 4EY

PROJECT

EA PERMIT APPLICATION

DRAWING TITLE

SITE RECEPTOR PLAN

DRAWING NUMBER

004

REVISION

1 - 05.03.25

SCALE

1:10000 @ A3

DATE

22.05.23

OLIVE

Compliance

3 CONTROL MEASURES

The site has a number of measures in place to control odour, all of these are considered in relation with the operations that are undertaken on site on a daily basis.

The site has aligned its environmental management system and operational procedures in accordance with the site environmental permit.

Site working plan procedures ensure that good operational practices are employed. Effective management and control minimises odour generation.

The following sections detail management techniques, procedures, and odour control measures to minimise the potential for odour generation.

3.1 Receipt and Management of Odorous Materials

The primary odour control measure on site is the strict adherence to the waste acceptance procedures. The below waste acceptance regime will result in a significant reduction in the likely odour potential of waste treated at the facility.

Permitted Waste Types

Only waste EWC codes as specified on the permit are accepted on site.

No other waste streams are accepted at the site.

Other Wastes

The facility also stores the below wastes on site.

Plastic -

cardboard, paper, wood etc – 20 03 01 - (stored in building) Non odourous

Metals - from incoming loads (stored in external stockpile) Non odourous

Below table (3.1) identifies waste storage timescales and capacity inline in line with the site FPP.

Waste Material	Location	Height (m)	Length (m)	Width (m)	Max Volume m ³	Storage Time
Internal – Waste Transfer Building						
Shed 1 Plastic	Internal Waste Transfer building	4.5	8	11	595m ³	4-12 weeks
Shed 1 Cardboard/paper	Internal Waste Transfer building	4.5	8	11	595m ³	4-12 weeks
Shed 2 Plastic	Internal Waste Transfer building	4.5	8	11	396m ³	4- 12 weeks

Shed 2 Cardboard/paper	Internal Waste Transfer building	4.5	8	11	396m ³	4- 12 weeks
Shed 3 Food x 2	Internal Waste Transfer building	4.5	21	4	396m ³	4-12 weeks
Shed 4 Food	Internal Waste Transfer building	4.5	21	4	396m ³	4- 12 weeks
Shed 6 Plastic	Internal Waste Transfer building	4.5	8	11	396m ³	4-12 weeks
Shed 7 Plastic	Internal Waste Transfer building	4.5	8	11	396m ³	4-12 weeks
Shed 9 WEEE	Internal Waste Transfer building	4.5	11.5	11.5	595m ³	4-12 weeks
Shed 9 Overflow- dried food	Internal Waste Transfer building	4.5	11.5	11.5	360m ³	4-12 weeks
Shed 10 Plastic x 4	Internal Waste Transfer building	4.5	4	17	306m ³	4-12 weeks
Shed 11 Plastic x 2	Internal Waste Transfer building	4.5	10	11	495m ³	4-12 weeks
Shed 12 Plastic bottles packaging	Internal					4-12 weeks
Shed 13 Plastic bottles packagin	Waste Transfer building					4-12 weeks
Shed 14 Plastic bottles packaging	Internal					4-12 weeks
Shed 15 Plastic/ card	Waste Transfer building	4.5	30	20		4-12 weeks
Anderson Shelter A	Fixed shelter building	4.5	12.2	12.2		4-12 weeks
Anderson Shelter B	Fixed shelter building	4.5	12.2	12.2		4-12 weeks
Anderson Shelter Barrel wash area	Fixed shelter building	4.5	12.2	12.2		4-12 weeks
External – Waste Transfer Building Canopies						
May contain plastic, paper, cardboard, food waste	External under canopies	3	5	16	240m ³	4-12 weeks (24 hours wet food waste)
External – Containers						
Maximum 4 x 40- yard containers May contain either wood, DMR, general or scrap metal.	External	1.07	1.52	2.29	3.72m ³	Max 1 month
External – Stockpile						

Scrap Metal	External	5	10	10	500m ³	4-12 weeks
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Pre-Acceptance of Waste

IMS Procedure Waste Pre-acceptance details the sites pre-acceptance procedures to assess waste (including odorous waste) prior to it being accepted on site.

Prior to the delivery of any loads, T3E will have an agreed written supply agreement (Producer Declaration Form) with each of the waste suppliers. Part of the agreement will be confirmation of the odorous nature of the waste. The agreement will also agree the description of the waste, EWC codes etc.

The facility also has to adhere to the Animal By Products Regulations when dealing with food waste.

Contract agreements state that all input of materials is confirmed that they will not accept any materials that have been stored once processed, awaiting transport to site for a period exceeding 7 days.

Acceptance of Waste

IMS Procedure Waste Acceptance details the site's acceptance procedures to ensure that no odorous waste is accepted on site.

A check shall be made to show that the waste type and source has been Pre-Accepted in accordance with procedure IMS Procedure – Pre-Acceptance. The vehicle will be then directed to the waste reception hall located within the Processing Building.

Where waste has not been Pre-Accepted the Site Manager shall be contacted and the waste assessed on specification. Any non-conforming material will be segregated and disposed of in accordance with Procedure IMS Procedure – Waste Rejection.

Waste Reception

Once the vehicle has been accepted on-site (in accordance with THINK 3E- IMS Procedure– Waste Acceptance), the vehicle will be directed to the waste reception Building 4.

The Site Manager will be responsible for the inspection of all waste deliveries to ensure compliance with Waste Acceptance criteria and that no odorous waste has been accepted on site.

Vehicles will unload the waste in accordance with IMS Procedure – Waste Reception and Storage procedures..

All waste will undergo a visual inspection during offloading to ensure that no waste exhibits malodorous properties. Any non-conforming material will be rejected from site in accordance with Waste Rejection

procedure..

The roller shutter doors of the building remain closed during unloading activities of malodorous materials (other than during access and egress) resulting in there being minimal potential for odour emissions from this part of the process.

Storage of Waste

Post receipt and validation wastes are stored in rows within the buildings. Examples below

Dry food waste boxed and wrapped



Loose plastics on stillages



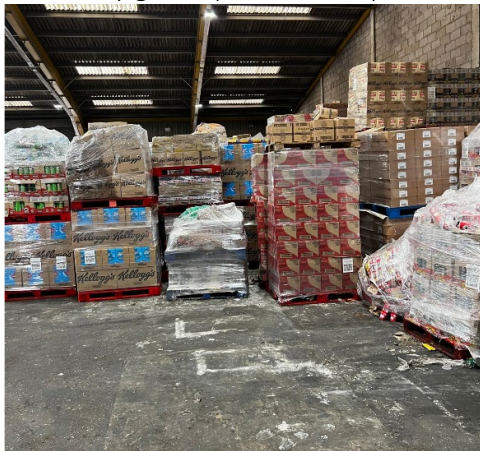
Milk processed within 24 hrs (and area washed down with bleach)



Incoming Barrels of egg shells and bread -Sealed lids



Stored dry goods (non odorous)



Stored bottles – non odorous



Stored tubed crisps



Plastics from take back



Stock of food waste awaiting depackaging



Site Infrastructure – Building and Ventilation

Please note there has been no Odour issue associated with the site processing of food waste. THINK 3E has enclosed all site activities (receipt, treatment and storage of waste) with the exception of the barrel emptying/bulking/washing process.

Negative pressure is not used in the buildings. There is no ventilation in the Reception/Process buildings.

The building does not have PVC curtains to reduce emissions through gaps in doorways.

All pedestrian fire doors are closed at all times.

Housekeeping

Daily inspections of plant and equipment are made as part of the daily vehicle checks, ensuring that they are kept free of any wastes and litter. Vehicle operatives will clean up such material on identification, placing material in the correctly designated storage stockpile. Daily plant inspection forms are used to record these checks.

Daily site inspections and general housekeeping of the site is also undertaken in order to minimise the potential for the build-up of waste and litter. These checks are recorded in the site inspection record.

Waste bays ideally are rotated, and bays fully cleaned out before allowing more waste to be deposited, - washing the bays may be necessary.

Bays and surfaces can be checked and cleaned easily to prevent historic waste and odours building up.

All waste storage areas in the Reception Hall are accessible to allow visual inspection and cleaning.

Frequent site cleaning takes place on site covering essential daily housekeeping, monthly tasks and deep cleans of site infrastructure, critical plant and the drainage system.

3.2 Transfer of Odour Chemicals to Air

The processing building encompassing waste reception, storage and processing is fully enclosed, with fast acting roller shutter doors ensuring no escape of potentially odorous air during vehicle delivery.

Potential odour emissions are from fugitive emissions.

Due to the nature of the waste subject to drying, there is very low potential for odour emissions from this part of the process and as such odour abatement is not considered necessary.

3.3 Transport and Dispersion

Based on the assessment and historic information, it is not anticipated that there is a significant risk of adverse odour impacts occurring at any sensitive location as a result of emissions from the proposed development.

3.4 Odour Neutraliser

A dust/odour misting suppression chemical can be delivered to the reception building and loading equipment to control and neutralise any odour via a can be delivered via a portable spray backpack system or fine spray using a pressure washer lance.

Odour neutraliser will be rotated to prevent outdoor fatigue both on and off site.

Odour shall be monitored daily at points around the site boundary and observations shall be noted in the site diary and/or on a daily monitoring document.

If odorous materials are detected on site, then an odour neutraliser can be delivered via a portable spray backpack system, directly to affected wastes within stockpiles/containers within the building by staff with appropriate training, prior to removal off site. This product can also be utilised for cleaning storage areas.

Product support is given by the manufacturer, with a 10lt Container x 6 kept in stock onsite. Supplies of this product can be sourced within 48hrs.

Product Information

Aiopure is the proprietary name for Surfactant Induced Absorption Technology (SIAT).

Aiopure is a sophisticated blend of surfactants that when introduced into the flow of water alters the effective area or interface of the water droplet by something in the order of 500,000%, making the water droplet highly absorbent.

It achieves this by having its hydrophilic (water loving) end in the water droplet and hydrophobic (water hating) end of the out of the droplet and in the air, this is what draws particulates out of the atmosphere and absorb them within the water droplet. As a result of this absorption the droplet increases in weight and eventually falls to the ground where it naturally bio-degrades.

Aiopure is a non-selective technology which means when atomised into the atmosphere in its water/chemical mix it will look to draw into the water droplet any airborne particulate.

Gas will be absorbed into the solute and bio-degrades when the droplet eventually drops to the ground.

Dust will be removed from the air and brought down to the ground.

Bacteria and virus are put into status and rendered harmless.

3.5 Engaging your neighbors

If an action is being considered that has the potential to cause temporary odour impacts (however small) outside of the normal operational procedures, then the Local Environment Agency area team will be informed in advance. neighbors who may be affected. The affected neighbours will be contacted to advise them of the operation being undertaken, and that any increase in odour will be of a temporary nature.

Such events are considered to be major plant outages or maintenance activities involving the sites odour mitigation measures.

In addition, the site will engage with the local community as often as possible in order to alleviate against negative site perception. The site management shall operate a publicly accessible website, whereby contact information is published such that the public remain informed and are provided with a means of contacting the site if necessary.

Our community outreach activities

Newsletter / leaflet

Leaflet explaining about site activities, remedial actions and information about complaining procedures. The company may choose to communicate with residents regarding any incidents or issues via this media.

Website Information

Website update explaining about site activities, remedial actions and information about complaint procedures. The company may choose to communicate with residents regarding any incidents or issues via this media.

Meeting with residents

In the event of a major incident or an issue which may lead to complaints regarding odour, the company will carry out a formal letter drop to inform local residents about the OMP and future improvements to the site and invite residents to contact us through the appropriate methods and/or to attend a public meeting regarding the issues on site.

This OMP will be updated to include actions and outcomes from any community engagement meetings.

The company will issue the odour diary form to residents who wish to participate in recording odour issues. A copy of the Odour diary is provided in Annex C. This information will be used to form the basis of discussion at community group meetings. Copies of the completed forms will be retained in the site records. A list of scores from residents participating in odour diaries will be summarised in future revisions of the OMP.

In the event of a complaint received from the public, T3E will operate in accordance with the dedicated odour complaints procedure (within the IMS).

Members of the public are able to contact the company with any odour complaints about the facility by the following means.

By telephone [0300 111 2223](tel:0300 111 2223) the contact number will normally be manned from Monday to Friday between the hours of 07:30 and 17:30. Outside of these hours, and on infrequent occasions during the above hours when an immediate reply cannot be made, there will be an answer phone service which is checked by the Shift Managers 24/7.

or

By email to info@Think3E.co.uk

These methods of contacting the site are displayed at the site entrance and on the company's website.

3.6 Response to Complaints

Receipt of an odour complaint during normal operations is treated as an exceedance of control levels. The primary response will be as detailed in accordance with the site's complaints procedure.

An Odour Complaint Report Form will be completed as soon as the complaint is received.

An investigation shall be initiated into the cause of the complaint, this will involve as necessary:

- An olfactory survey following the procedure detailed in Section 4.3. The results of the survey will be recorded on the Odour Reporting Form provided within Annex A;
- An examination of the site activities at the time of the complaint;
- An examination of the meteorological conditions at the time of the complaint; and
- A review of the effectiveness of operational and odour control procedures.

If the complaint is validated it will be treated as an exceedance of the control level. The outcome of the investigation will determine the corrective actions to be implemented (see Section 5).

3.7 Ceasing or Reducing Operations

If the investigations carried out as a result of the complaint suggest that the activities on site need to cease, no more waste will be accepted on site and the process will be stopped.

3.8 Accident Management Plan

The site maintains an accident management plan as required by the Environmental Permitting Regulations.

The accident plan sets out the actions to be taken and measures required to prevent incidents and where an incident occurs the appropriate mitigation action to be taken.

The plan considers the following scenarios:

- Any spillage / leaks or loss of containment;
- Any vandalism which could cause damage to the plant and equipment resulting in spillage of waste;
- Flooding;
- Fire due to plant malfunction or electrical equipment causing an ignition source;
- Receiving incompatible waste on site;
- Failure of main services;
- Failure of major plant and equipment;
- Failure or unavailability of any environmentally critical plant; and
- Being unable to receive waste into the site i.e. alternative storage or refusal of loads.

Please refer to Section 6 which provides more information on how the site will address any events which could cause odour emissions from site.

Odour Management Plan V2

4 MONITORING

The company will employ the following monitoring techniques to ensure that the Key Control Measures (Section 3) are maintained and effective, operational procedures are followed and that good practices are being implemented:

- Site inspections by the Site Manager or delegated personnel;
- Site audits and inspections by the Environmental Agency;
- Site Inspections by the Planning Authority; and
- Third party audits.

4.1 Responsible Persons

All site personnel are responsible for immediately reporting odour problems to the Site Manager or Managing Director.

4.2 Meteorological Conditions

Meteorological forecasts and conditions shall be monitored to ensure that any potential odour complaints can be fully investigated and that effective monitoring can be carried out. Meteorological data will be recorded as per Table 4.1 below.

Table 4.1: Meteorological Monitoring	
Monitoring Requirements	Frequency
Observed and recorded description of conditions: precipitation, drizzle, rain, sleet, snow, temperature, winds etc.	Recorded daily
Wind speed and direction	Recorded continuously
Temperature	Recorded continuously

Odour Management Plan V2

4.3 Olfactory ('Sniff Test') Monitoring

Odour shall be monitored daily at points around the site boundary and observations shall be noted on the daily odour report form provided within Annex B. Surveys shall be carried out in accordance with the monitoring protocol contained within the Environment Agency's Technical Guidance Note H4.

Four suitable locations downwind of the drying plant but internal to the site boundary will be chosen to carry out the sniff test to clarify that the impact is not detectable at the site boundary and able to create an offsite impact.

In the event that odour is detectable at the site boundary, an offsite investigation will be required in the direction of the prevailing wind and closest sensitive receptor. This will also be recorded on the daily odour report form provided within Annex B.

The odour assessor must not be subject to significant odour in the 30 minutes prior to the assessment and shall be compliant with the requirements laid down in the Olfactory Survey procedure. This is to ensure that monitors are not suffering from odour fatigue and will be sensitive to site odours.

If any detectable odour is identified at the site boundary and is judged to be moderate (Odour Intensity Rank 3) then the Managing Director (or Site Manager) will be notified immediately and the olfactory survey will continue to attempt to determine the scope and extent of the odour plume, as follows:

- A suitable location downwind of the site and potentially sensitive receptor at which the odour plume is unlikely to extend will be selected for assessment;
- Survey will continue toward the facility until a site-related odour is perceived; and
- Assessment points perpendicular to the plume axis and equidistant from the site will then be monitored, subject to access requirements.

Monitoring frequencies shall be as detailed in Table 4.2.

Table 4.2: Monitoring Frequencies		
Parameter	Monitoring Technique	Frequency
Meteorology	See Table 4.1	
Odour	Olfactory monitoring	Daily site and perimeter checks. Increased frequency in response to complaints.

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	External Olfactory Monitoring	Quarterly site odour monitoring by competent third party
	Complaint monitoring	Continuous
Complaints	Corrective action monitoring	Post-implementation of a corrective action

The following scales will be used:

Table 4.3: Odour Intensity Scale	
Score	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

Table 4.4: Hedonic Tone Scale	
Score	Intensity
+4	Very Pleasant
+3	Pleasant
+2	Moderately Pleasant
+1	Mildly Pleasant
0	Neutral Odour / No Odour
-1	Mildly Unpleasant
-2	Moderately Unpleasant
-3	Unpleasant
-4	Very Unpleasant

4.4 Internal Odour Monitoring

Odour monitoring is conducted at frequencies detailed in Table 4.2 by a competent person.

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Distances and locations of off-site monitoring points will vary in accordance with the meteorological conditions (i.e. depending on the specific wind speed and direction at the time of monitoring).

The main aim of monitoring will be to test if any odours emitted from the site will be causing the nearest receptors nuisance. In scenarios where nuisance is being caused then operations can be suspended until the conditions improve, also the site manager may deem it necessary to find the precise source of the odour and attempt to eliminate it or neutralise it immediately.

4.5 Further Monitoring

If odour becomes a problem on site and / or a complaint has been received, odour modelling will take place to establish the source and any corrective action that may be required.

4.6 Records

Daily records shall be maintained and include the following details:

- Results of inspections and olfactory monitoring carried out by site personnel;
- Weather conditions including wind speed and wind direction;
- Operational problems including date, time, duration, prevailing weather conditions and cause of problem;
- Complaints received including address of complainant (if available);
- Details of corrective action taken, and any subsequent changes to operational procedures; and
- An evaluation of the effectiveness of control and abatement techniques used.

If any samples have to be analysed by laboratory-based olfactometry then the following records must be made:

- Date, time and details of emissions point sampled, and why you chose them;
- How you preserved the samples (holding time and conditions);
- Method of sampling (e.g grab sample);
- The laboratory where the results were analysed, and any certification status;
- Any laboratory observations that might affect how you interpret results;
- Process parameters; and
- Weather conditions.

5 COMPLIANCE ACTION PLANS

5.1 Control & Trigger Levels

Control trigger levels are presented below in Table 5.1.

Table 5.1: Control & Trigger Levels		
Parameter	Monitoring Technique	Control Levels
Odour	Routine olfactory monitoring	Odour Intensity ≥ 3 recorded at any monitoring location (persistent / transient nature noted and considered)
	Complaint monitoring	Receipt of complaint

5.2 Compliance Actions

A recording of Odour Intensity ≥ 3 during routine olfactory monitoring or the receipt of a complaint will necessitate further investigation into the causes and indicate whether further monitoring is required. Actions to be taken in the event of an exceedance will be dictated by the nature and extent of the exceedance(s) (e.g. by considering the magnitude of exceedance and whether it was event driven or on-going).

5.3 Detection of Moderate Odour During Olfactory Survey

Detection of a moderate odour, (i.e. 'odour easily detected while walking and breathing normally, possibly malodorous), will initiate a more extensive olfactory survey to determine the extent of the odour plume (as described in Section 4.3). An investigation will be initiated into the cause of the odour. This shall involve as necessary:

- A review of the site activities at the time of the olfactory survey;
- A review of the meteorological conditions at the time of the olfactory survey; and
- A review of the effectiveness of process operations and odour control procedures.

5.4 Corrective Actions

The outcome of an investigation will determine the corrective actions to be implemented, they will consider, but not be limited to:

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- Alteration to waste reception procedures and odour control measures employed;
- Review of all processes on site; and
- Update of OMP if new procedures are created.

5.5 Reporting

Exceedance of a control level will be investigated (as described above) and recorded. This includes recording the following:

- Nature of the incident;
- Date of occurrence(s);
- Results of the investigation;
- Details of responses/ action plans implemented;
- The event will be marked within the site's incident log;

6 INCIDENTS AND EMERGENCIES

Consideration has been given to the types of failure or abnormal events that have the potential to result in an odour impact (See Table 6.1).

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Table 6.1

Problem / Scenario	Issue	Action
Odorous load arrives last thing at night after all export has ceased for the day.	Potential for overnight complaint	• Reload onto vehicle if possible. • If not possible carry out heavy odour treatment and disinfect with neat product, cover with clean material to seal and remove next day first load.
Exhaustion of odour treatment stock	Unable to operate odour suppression	• Ensure stocks are monitored daily. • Always ensure there is 10lt in stock, which is 8 weeks requirement. • Lead in time is 1 working day for deliveries.
Damage identified in bay structures	Holes can cause uncontrolled odour release points	• Ensure daily structural inspections are carried out. • Maintenance is reactive with planned maintenance programmes in place. • Call maintenance contractor and repair.
Fire on Site	Access for emergency equipment Management of the fire is the priority	• Raise alarm as per fire plan and contact fire marshall. • Inform weighbridge to cease import of waste. • All non-essential operatives to leave waste building and report to muster point. • Weighbridge to inform all incoming hauliers of redirection to ensure site congestion is minimised for Emergency Services attendance. • Ensure all doors are closed where possible. • If localised small fire attack with fire equipment, only if deemed safe to do so.
Failure of waste handling/processing equipment	Plant breakdowns Staff absence	• Cease import of waste to activities affected by failure until extent of the breakdown is known. • Wastes are stored internally with roller doors to contain the risk of odour leaving the building. • Divert wastes to the quarantine bay as an overflow measure. • Monitor import volumes to ensure site storage capacity is not exceeded, allow import of waste only if confident of handling capacity, to ensure we can balance import / export ratio.

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Problem / Scenario	Issue	Action
		• Cease import when storage capacity is reached. • Weighbridge to inform all incoming hauliers of redirection to alternative site to keep stock waste to a minimum. • Service agreement with plant/equipment supplier to support with repair requirements. • Utilise alternative equipment to carry out loading of existing waste.
Haulage issues	Site storage capacity reached Incoming loads require redirection	• Cease import of waste until extent of the haulage problem is known and evaluated. • Weighbridge to inform all incoming hauliers of redirection to alternative site to keep stock waste to a minimum. • If traffic based issues re-route vehicles to minimise impact prioritising older / odorous waste. • Carefully monitor incoming waste capacity, to ensure the balance of import / export ratio. • The company has relationships with an extensive network of waste management companies and suppliers. These contacts can also be drawn upon to temporary redirect wastes.
Onward recycling/ disposal route problems	Destination is unable to accept materials	• Cease import of waste until extent of the delay for disposal is evaluated. • Weighbridge to inform all incoming hauliers of redirection to alternative site to keep stock waste to a minimum. • Re-route vehicles to alternative landfill site minimise impact, prioritising any old / odorous waste. • Ensure that no incoming waste is accepted until such time as offsite disposal is confirmed as available. • Proactive treatment and monitoring of all waste for odour and infestation in anticipation of delay in removal from site.

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Problem / Scenario	Issue	Action
Employees issues	Shortage of responsible employees to deal with odour	• Implement holiday booking procedures to ensure that a trained member of employees responsible for odour issues is always on site during working hours. • Training for nominated employees on odour issues to allow for stand-in, in the event of sickness of a designated odour controller. • Provide a call-out register so that employees are aware of who will be on stand-by in the event of sickness or emergency. • Implement agency support for long term staff absences.

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6.1 Abnormal Meteorological Conditions

Although it is accepted that a number of meteorological conditions can exist that promote the generation of odour and may inhibit its effective dispersion (i.e. high temperatures and still conditions) such scenarios are not considered to have the potential to impact the facility and surrounding receptors.

The facility will monitor and record all meteorological conditions and make suitable planning arrangements to ensure that any major maintenance activities are carried out in favourable meteorological conditions to reduce the potential for impact.

7 CONCLUSION

This Odour Management Plan is considered to be a 'working' document that will be reviewed and updated annually or as required should any of the following occur:

- an incident/substantiated odour incident on site;
- the results of any testing of this OMP indicate that changes are required;
- a change or review of legislation; or
- if the site is instructed to do so by the EA.

It will be the responsibility of Senior Management or nominated person to maintain this Odour Management Plan and to ensure it is adhered to limit the risk of odour occurring on-site.

Any updates to this OMP, either as a result of specific incidents or identified during its testing/review, will be submitted to the EA for its approval prior to implementation of the proposed changes at the site.

APPENDIX A

APPENDIX B

APPENDIX 3

Odour Diary						Sheet No	
Name:		Address:		Notes on Intensity (Detectability) 0 - No odour detected 1 - Very faint, odour unlikely to cause annoyance (odour barely detectable inhaling face to the wind) 2 - Faint odour, unlikely to cause annoyance 3 – Distinct odour, likely to cause annoyance (odour easily detected while walking and breathing normally)		4 - Strong odour, likely to cause annoyance 5 - Very strong odour, likely to cause annoyance (possibly causing nausea depending on the type of odour) 6 – Extremely strong odour, highly likely to cause annoyance (possibly causing nausea)	
Telephone Number:							
Date of odour:							
Time of odour:							
Location of odour, if not at above address:							
Weather conditions (dry, rain, fog, snow etc):							
Temperature (very warm, warm, mild, cold or degrees if known):							
Wind strength (none, light, steady, strong, gusting):							
Wind direction (e.g. from NE):							
What does it smell like? How unpleasant is it? Do you consider this smell offensive?							
Intensity – How strong was it? (see below 1-6):							
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:							