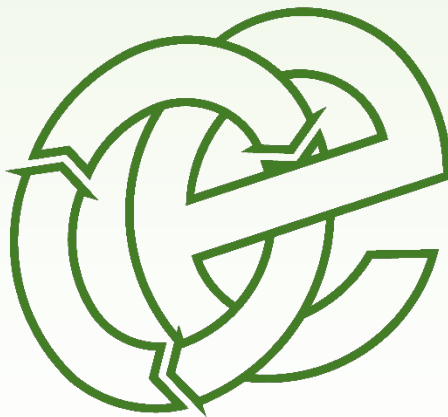


ODOUR MANAGEMENT PLAN - EPR/VP3524SV/A001

The Dock, St John's Road, Boston, Lincolnshire, PE21 6BN

Port of Boston Limited

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1 Introduction

1.1 General

- 1.1.1 Oaktree Environmental Ltd has been instructed by Port of Boston Limited to prepare an Odour Management Plan (“OMP”) for their waste transfer and treatment facility at The Dock, St John’s Road, Boston, Lincolnshire, PE21 6BN. The site will be operated as a household, commercial and industrial (HCI) transfer station comprising the acceptance, storage and transfer of SRF and RDF bales.
- 1.1.2 In addition to this OMP, the site will be operated in accordance with an Environmental Management System (EMS) and Fire Prevention Plan (FPP) along with other documents targeted to specific environmental considerations including this OMP.
- 1.1.3 This OMP will be kept in the site office located off site and all staff will be trained in the contents of the document which will allow Port of Boston Limited and its employees to implement an action plan should the site operatives detect an odour presence, receive complaints from local business or residents and if the EA suspects odour emissions from the site during an inspection.
- 1.1.4 This OMP has been prepared to meet the requirements of The Environmental Permitting (England and Wales) Regulations 2016 and the Environment Agency’s Guidance: “*Develop a management system: environmental permits*” published 01/02/2016 (updated 04/08/2021 and “*H4 odour management*” published 04/04/2011).

1.2 Site Location

- 1.2.1 The site is located on Land at The Dock, St John’s Road, Boston, Lincolnshire, PE21 6BN. Access to The Site is secured by 24/7 security team. The main entrance to the Port of Boston is via St Johns Road which is accessed from the main road (John Adams Way). All deliveries will come from this access point where the drivers must stop at security and book onto site. The drivers must then proceed to the storage location.

1.3 Hours of operation

- 1.3.1 The site is expected to be open on a 24/7 basis which is required for the loading from quay to vessels – 365 days a week. For receiving bales into the site this is usually 06:00 to 18:00 Monday – Friday and 07:00 - 12:00 on a Saturday.
- 1.3.2 The site may also need to receive bales on outside of the above hours e in the event of an emergency shipment. It must be noted the dock itself operates on a 24/7 basis.

1.4 Waste Types and Quantities

- 1.4.1 The waste types handled on site will be household, commercial and industrial wastes as defined in the Controlled Waste (England and Wales) Regulations 2012 and Section 75 of the Environmental Protection Act 1990.
- 1.4.2 The site will only be accepting two wastes which are defined as:
- 19 12 10 - combustible waste (refuse derived fuel)
 - 19 12 12 - combustible waste (solid recovery fuel)
- 1.4.3 These wastes if not carefully managed have the potential to create odour. No other wastes will be accepted into the site.

1.5 Reviewing and monitoring this OMP

- 1.5.1 This document will be due for review two years from the date of approval, or, as a result of any incidents which may lead to the requirement for immediate review or the OMP guidance changing, whichever is the sooner. The circumstances which would warrant a review are the following:
- Experiencing an odour incident
 - Additional odorous waste streams accepted on site.
 - Increase waste volumes accepted and stored.

- Development of site infrastructure – new buildings.
- Installation of new equipment or plant – baler/loading shovel/sort-line/ etc.

1.5.2 Reference should be made to Section 4.10 which details procedures for staff training in the event of any changes in relations to the OMP.

1.6 Site Management

1.6.1 The sites Technically Competent Managers (TCMs) is responsible for the general management of the site including the acceptance and storage of wastes at the site.

1.6.2 The company, through the TCM, will ensure that a nominated deputy is sufficiently trained and familiar with all site management documentation (which includes this OMP) in addition to all relevant company procedures who, in the absence of the TCM, will act the competent person.

2 Odour Risk Assessment

2.1 Methodology

2.1.1 This OMP has been completed to identify where the likely risks are in relation to surrounding land uses. This assessment has been used to inform Section 5.0 of this OMP with regard to specific odour monitoring procedures.

2.2 Odour Intensity

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

Table 2.1 – Odour Intensity

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

2.3 Receptor Sensitivity

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

Table 2.2 – Receptor sensitivity

Sensitivity of Receptor	Criteria
Low	Industrial workplaces
Medium	Industrial workplaces / Residential >250 m
High	Residential areas <200m

2.4 Sensitive Receptor Locations

2.4.1 A Receptor Plan has been produced to accompany this OMP and is shown in Appendix I referenced as on Drawing No. POB/3401/04. The receptors highlighted are those which are considered to be at risk from the site.

2.5 List of receptors

2.5.1 The receptors illustrated on the Receptor Plan are also shown in the table below with approximate distances to these properties.

Table 2.3 – Distances to Selected, Representative Sensitive Locations

Receptor	Location	Approximate distance from site boundary (m)
Numerous surrounding industrial and commercial uses	Surrounding	0 – 1,000
Residential dwellings in the surrounding area	Surrounding	115 – 1,000
Schools	North-west – north-east	570 – 950
Surrounding highway networks	Surrounding	200 – 1,000
Nearby leisure / retail	Surrounding	0 – 1,000
Surface Waters including the Haven watercourse to the south and east of the site plus other surface waters in the vicinity	Surrounding	10 – 1,000
Priority habitat inventory; Mudflats and Coastal Saltmarsh	South, west and east	30 – 1,000
Priority habitat inventory (deciduous woodland)	East	450
Local Nature Reserve	South-east	740 – 1,000

2.5.2 The above receptors are clearly identifiable on Drawing No. POB/3401/04 which should be referenced when reviewing these receptors. The receptor plan is scaled meaning the above areas can be clearly reviewed with exact distances from the site b

2.6 Risk Matrix

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

Table 2.4 – Risk matrix

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

3 Potential sources of odour

3.1 Storage

3.1.1 The waste accepted with comprise bales of RDF or SRF which are wrapped. These will arrive at the site in bulk, stored awaiting shipment in the adjacent port.

3.1.2 These wastes are likely to contain some fine organic materials which can, in some cases, be attributed to a general “musty” odour. This smell is exacerbated following ingress of rainwater which occurs predominantly whilst the wastes are resident in skips/containers at the sites of production and prior to receipt at the site.

3.1.3 Whilst not common, these wastes have the potential to contain materials of a putrescible nature which are not identifiable until the load has been tipped at the site.

3.2 Background Odour Sources in the Area

3.2.1 Other potentially odour emitting operators, sites or areas are tabulated below in the table below.

Table 3.1 - Other Odour Generating Operators

Facility	Distance and Direction from Site	Overall exposure level	Comments
Riverside Industrial estate	260m – SW	Low	Due to the South Westerly winds, odour unlikely to travel this distance
Howard Tenens Logistics – Boston	200m - S	Low	As above
Howard Tenens Property – Boston, Marsh Lane	280m - SE	Low	As above
National Grid	250m - SE	Low	Rarely occupied.
Alfred Street	280m - NE	Low	Residential Estate
Lingrain	270 - NW	Low	Site Tennant

3.2.2 in the vicinity which may release odour due to certain fertilisers being used.

- 3.2.3 Odour release could also be the result of dry, hot, wet weather conditions, including a combination of all over a number of days, machinery breakdowns and human error.
- 3.2.4 In order to determine whether complaints are the result of activities from the site or from other nearby sites an odour complaints form will need to be completed in line with the company's complaints procedure which is attached in Appendix II.

4 Odour control

4.1 Pre-acceptance checks

4.1.1 In order for customers to deliver waste at the port, pre-acceptance checks including compliance checks at the producer site will take place. These checks are to ensure the process generating the RDF/SRF is suitable and the producer site is aware of the quality of material required for the site.

4.2 Waste acceptance procedure

4.2.1 As all waste delivered to the site will comprise bales which are wrapped, there should be very little chance of odour. Odours would only arise if the bale packaging is damaged or non-conforming waste is received. On this basis, staff will be trained by site management to ensure only baled RDF/SRF is accepted and to not accept any bales which are damaged. Any damaged bales on discovery would be loaded back onto the vehicle delivering the waste and rejected.

4.2.2 Strict waste acceptance procedures are in place at the site as shown below and the following details will be recorded for every load deposited at the site:

- a) The date and time of delivery.
- b) The name and address of the waste producer.
- c) The detailed and accurate description of the waste including type, quantity (in tonnes and/or cubic metres) and EWC codes.
- d) How the waste is contained e.g. loose, container type.
- e) The carrier's name and address.
- f) Driver's name, signature and vehicle registration No.
- g) Signature or initials of person(s) producing/ accepting/ inspecting/ carrying the waste.
- h) Additional handling details/notes made by the driver after inspection of the load.
- i) SIC code of the premises which produced the waste (where relevant).
- j) Waste hierarchy declaration.

k) Information on previous treatment of the waste e.g. manual or mechanical.

4.2.3 The Port of Boston will only accept documented waste which is expected to arrive on site. Any unexpected will be rejected.

4.2.4 Waste bales will not be accepted if, for any reason, the site does not have enough storage capacity or if the site is inadequately manned. This will prevent over stockpiling, leading to longer storage durations which could exacerbate odour.

4.2.5 Any incoming or outgoing waste has the relevant waste transfer papers.

4.2.6 All relevant documentation for exporting waste will be placed on board the ship for the receiving agent. The correct customs documents will be processed before departure.

4.3 Site Operations

4.3.1 Limiting odour from the waste recycling facility can best be achieved through employing effective site management and good general practice. It is much easier to minimise odours in the first instance rather than dealing with problems when they occur.

4.3.2 The next section addresses the general site management guidelines and identifies specific procedures to mitigate against odorous emissions.

4.4 Receiving Wastes

4.4.1 Waste suppliers and HGV skip vehicle drivers are required to ensure that only acceptable material is brought to site to minimise the incidence of rejection. If staff continually bring odorous waste to the site, the operator will initiate their three-strike rule:

- a) Additional waste type recognition training (see EMS)
- b) A verbal and written warning
- c) Refused entry into the site or potentially disciplinary.

- 4.4.2 The SRF and RDF waste bales are transhipped by coaster vessels. The vessels will come alongside the riverside berth to the south-east of the site. This allows the cranes access to the SRF and RDF waste bale stacks, minimising handling, reducing chances of damaging the bales.
- 4.4.3 Where the cranes cannot reach the stack, a forklift operator will bring the bales closer. The same process and care is taken handling the bales here as when they are first unloaded from the trailers.
- 4.4.4 The bales are then loaded onto the ships with a hydraulic bale attachment. This is done two at a time. The pressures are set as to not damage the bales but also secure enough to not drop the bales.

4.5 Storage of Wastes

- 4.5.1 All waste will be stored in bale stacks as shown on Drawing No. POB/3401/03. The Port of Boston only store SRF/RDF ready for loading onto vessels against known contracts with TFS in place. Typically, this will be 1-21 days but no longer than 3 months. The 3 months shown on the site plan is to cover contingencies. If any bales are discovered to be damaged, they will be quarantined and removed off site within 24 hours.

4.6 Housekeeping

- 4.6.1 Regular cleaning of operational areas (i.e. minimum once daily) such as roads, drainage channels and interceptor will be carried out using mobile plant and water supplies to discourage odour generation from old degrading materials. Additional plant can be sourced instantaneously from the surrounding industrial estate such as a road sweeper if deemed necessary. The odorous materials will then be placed in a sealed rejected waste skip which will be removed every 24hours or sooner if staff detect odorous emissions following daily inspections. Site management will delegate these tasks to operational staff and seek radio or written confirmation that the tasks have been complete and whether any odours have been detected.

4.6.2 In addition to daily visual monitoring of the site; site management will monitor the integrity of the building on a quarterly basis. In the event that there are any issues resulting in odour escaping from the building then maintenance works will be carried out within 48 hours.

4.6.3 A housekeeping schedule has been produced overleaf and site management will train operational staff via toolbox talks every 6 months or sooner if site operations change to ensure the following housekeeping schedule is strictly adhered to.

- Avoid fugitive odorous emissions through good housekeeping
- Maintain a clean, well-organised site
- Clean equipment that has been in contact with odorous materials
- Carry out a deep clean of the concrete pad every quarter, this may be phased depending on which areas the bales are being stored.
- Concrete floors draining appropriately and slopes / catchments pits are functioning
- Floors are sealed to prevent absorption and adsorption of odour producing residues.
- Periodically treat drainage systems with bacteria-inhibiting solution

4.7 Site Infrastructure

4.7.1 The site deploys the following measures ensuring odours do not escape beyond the site boundary.

- **Monitoring** – It is considered any off-site monitoring is not required due to the wastes being stored at the site. Off-site monitoring would only be required in the event of complaints, this would be agreed with the EA. Monitoring would only be for inspecting all bales stored to ensure there is no damaged. The bales will not give rise to odour if securely wrapped, even if stored for the maximum period of 12 weeks.
- **Stock rotation** –The site follows the first in, first out principle which ensures that the oldest wastes are removed from the site first and aren't left to stand for a long period of time.
- **Housekeeping** –. The site has a housekeeping schedule shown in section 4.7.

- **Storage procedures** – Site management will visually monitor the bales at least twice per day to ensure no damage is present. Any damaged bales discovered will be removed off site.

4.8 Liaison with Neighbours

- 4.8.1 In the event of significant but temporary odour releases outside normal operations, immediate neighbours within 200m will be contacted via phone call or face to face to advise them of the situation and the action being taken. The EA will also be notified by a telephone call or email to the inspecting officer or this person is on leave, the local area team. This would only occur if a number of damaged bales are discovered on site.
- 4.8.2 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.
- 4.8.3 If any odour complaints are received, the complaint will be assigned to an operative familiar with the sites operation who will complete a 'complaints and events log' and detailed individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). Odour complaints will be investigated and responded to within 24 hours and suitably reviewed by the site manager who is ultimately responsible.
- 4.8.4 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint. If there are significant odour releases outside normal operations, the operator will cease operation, investigate and resolve the issue before continuing.

4.9 Training

- 4.9.1 All employees of Port of Boston Limited will receive training on how to correctly identify any bales which could be damaged and complaint report training. Site management comprising the director/TCM/site foreman/site manager will be responsible for delivering the training to employees within the company.
- 4.9.2 A full test (drill) of the procedures in this document will be carried out every 6 months to test that the plan works. The first test will take place within one month of the agreement of this document with the EA. The outcome and any follow up training for staff will be documented in the site diary and relevant forms in the EMS and this OMP. The OMP checklist will also be used during the drill. Site management will responsible for completing the drill.

5 Monitoring

5.1 Monitoring Odorous Releases

5.1.1 The site has identified the following process trigger levels which could result in an odour release at the site

- i) Non-conforming waste being accepted into the port
- ii) Damaged bales being delivered to the site and stored
- iii) Bales becoming damaged during moving on site
- iv) Standing surface water caused by either a blockage in the drainage system or arising from a heavy rainfall event
- v) Staff illness, negligence or no shows meaning waste acceptance is not being carried out correctly.
- vi) Transport failures leading to excessive storage of waste and for longer than necessary
- vii) Drought/warm periods which causes the waste to stagnate and smell

5.1.2 **On-site** – As there are up to three members of staff working at the site, it is considered at least one of these staff members would be able to detect if any odour is present on site, this would be usually off-site staff who are not continually exposed. If a non-operational staff member (driver, admin staff) identifies an odour, they will report this to site management and then follow the procedures shown in section 5.2.3. This would ensure the odour problem can be investigated on site prior to a potential odour complaint.

5.1.3 In the event of one of the scenarios in shown in Section 5.1.1 occurs on site, site management will carry out odour management monitoring immediately using the procedures shown in the next sections of this OMP.

- 5.1.4 Port of Boston Limited will use the following techniques to monitor odorous releases if a complaint has been made to the company:
- a) Olfactory Monitoring
 - b) Complaints Monitoring
 - c) Odour Diaries (when necessary)

5.2 Olfactory Monitoring

- 5.2.1 In the event of a discovery of damaged bales arising from daily inspections or from an odour complaint, the site supervisor will monitor odour around the entire site perimeter at least twice daily and an Odour Diary will be completed (Appendix II). The monitoring will be carried at intervals out while the site is operational, additional monitoring may be carried should there be reason to suspect a potential odour problem (potentially malodorous waste onsite, foul surface water issues etc.). It is not considered necessary to have fixed odour monitoring points due to infrequent weather conditions. If there is an easterly or westerly wind, the staff member carrying out the monitoring will observe the area from the north or south so dust can be easily identified. The site staff member will complete the monitoring and form in Appendix II at least once every 12 hours or in the event of the circumstances shown in Section 5.1.1 immediately then every 3 hours afterwards. Should it be observed if odour is being released, the staff member will radio site management who will find the odour release and rectify the problem immediately. The EA and off-site receptors will be contacted immediately.
- 5.2.2 The results of monitoring exercises and any remedial action taken will be entered into the log book which is available for the EA to inspect upon request. The name of the site supervisor will be stated in the site's diary / inspection form for each day of operation along with notes on weather including precipitation, temperature, wind speed and direction (from Met Office information).
- 5.2.3 Should the monitoring conclude that a certain activity/waste is giving rise to odour which is migrating offsite, steps will be made to reduce the impact of this activity, which may include,

but is not limited to; removing the waste off-site to a suitably permitted facility rather than waiting for the ship to arrive.

5.2.4 The site supervisor will be suitably trained to carry out these duties. Further information regarding training and technical competence is provided within the site's EMS.

5.2.5 Prior to carrying out a routine odour check, the relevant member of staff will vacate the site for a period of 30 minutes (in addition to 5.3.2 below) and then carry out the assessment on their return to ensure they are not desensitised to the odour.

5.3 Odour Monitoring Procedure

5.3.1 If sniff testing is required, it will be carried out by trained; competent staff daily (at least twice) should the management have reason to suspect odorous emissions from the site or complaints received. Assessments will be carried out both routinely and in response to specific complaints.

5.3.2 The assessor should not:

- a) Smoke or consume strongly flavoured food or drink for at least 30 minutes before the assessment.
- b) Consume confectionary or soft drinks immediately before the assessment.
- c) Apply scented toiletries, such as perfumes or aftershave immediately before an assessment.

5.3.3 Starting points of assessments should be downwind of the site, progressing towards the site boundary and then away from the site in an upwind direction. The person carrying out the assessment should walk slowly and breathe as normal. The points have not been provided on the site plan due to the regular variations in wind speed and direction.

5.4 Complaints Monitoring/Procedure

- 5.4.1 All odour complaints will be investigated promptly, and appropriate remedial action will be taken if the complaint is validated e.g. remove odorous materials off site as soon as reasonably possible. Complaints will be recorded on the form found in Appendix II.
- 5.4.2 Complaints to the EA will also be recorded and taken into account. An olfactory assessment survey will be carried out from where the complaint was made and from any convenient locations between the complainant/receptor and the site so that the complaint can be validated or rejected.

5.5 Odour Diaries

- 5.5.1 If members of the local community are frequently reporting odour issues in the vicinity, then they will be asked (if agreeable) to keep an odour diary. This will help to build up an account of when the odour occurs, their location and the site operations that were being carried out at the time, as well as the duration of the activities taking place. Any obvious problems can then be addressed.

6 Contingency Plans

6.1 Contingencies and Emergency Plans

6.1.1 In accordance with the EA's guidance on OMPs, the operator will develop contingency plans to react to situations 'where monitoring indicates that a potential odour source is not completely under control, meteorological conditions are unfavourable or that adverse impact has occurred'. Odours will be based on a 1 – 5 scoring scheme as shown below and also in the odour diary shown in Appendix II:

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

6.1.2 If odours based on 3-5 are detected at the site boundary, other monitoring point or a complaint is received, the following remedial procedures will be taken:

- a) Firstly, identify the odour source; is it from:
 - i) Site operations; or,
 - ii) An off-site source (e.g. agricultural spreading operation)

- b) If on site:
 - i) Report incidence to the site or technically competent manager;
 - ii) Identify the point of release of the odour;
 - iii) Identify the cause if the release i.e. machine breakdown, leakage, etc.;
 - iv) Identify a solution;
 - v) Implement a solution;
 - vi) Carry out olfactory tests to check if fix is working;
 - vii) Record actions taken on relevant forms and site diary as required by this plan

6.1.3 Then actions taken if odour is being produced on site will be:

- a) **Normal Operations:** The offending odour will be traced and the reason for the cause of the problem will be investigated. Once solutions are in place, olfactory monitoring will be carried out to ensure the solutions put in place are having the desired effect.
- b) **Abnormal Conditions:** Adverse weather conditions can promote generation of odour and inhibit its effective dispersion e.g. hot weather with little wind, resulting in increased risk of odour to receptor locations. If this happens odour causing operations will cease until more favourable meteorological conditions return.

6.2 Corrective Actions for Various Situations

6.2.1 The table below summarises the various problems likely at the site and the standard responses available, which will assist in reducing odour potential.

Table 6.1 –Corrective actions

Process	Problem	Corrective Action
Waste Delivery (unloading bales)	Deposit of odorous load	Isolate material. Reject material giving rise to odour.
Stored wastes (stored bales)	Odorous emissions detected	Olfactory/SNIFF test required to pinpoint source. Ensure procedures outlined in Section 5 are adhered to in full. Remove malodorous waste to a suitably permitted facility. Implement liaison programme if risk deemed HIGH or VERY HIGH i.e. strong or severe as shown in Table 2.1.

6.3 Staff shortages/human error

6.3.1 In the event of unforeseen staff shortages arising from illness, suspension or no shows, the operator will make a judgement whether to reduce the number of incoming loads, thus reducing the amount of bale storage on site which would limit the duration of storage. The operator would then look to then seek temporary employment from an adjacent site or someone within the company within 48 hours to ensure the site can continue to operate at its required capacity.

6.3.2 All staff are trained and undergo toolbox talks every 6 months (or sooner if operations change) to reduce the impact of human error. In instances where a human error has caused to an odour issue, the site may suspend operations until the issue has been rectified and the member of staff will be warned and re-trained accordingly.

6.4 Weather conditions / emergency situations

6.4.1 The site will set up a notification alert system with the Met Office or other weather app to receive updated weather information for the following weather conditions which could cause a potential on or off-site odour issue:

- High winds reaching up to 7 on the Beaufort Wind Scale which could exaggerate an odour
- Droughts or periods of hot weather exceeding 3 major dry days which could lead to water shortages, hosepipe bans and excessive odour
- Flooding

6.4.2 The site would install the following preventative/contingency measures (in addition to control measures in Section 4) to avoid serious odour issues as a result of the above weather conditions or fire incident:

- Contact an additional haulier to help remove the waste on site.
- Suspend any further waste deliveries to the site.
- Contact the EA to agree a suitable course of action
- Contact members of the public or any other persons who could be affected by the odour and advise of the contingency measures the site has employed and timescales when the odour is likely to be reduced.

6.4.3 If the site continued to receive the complaints, the site would have no option to remove all waste from the facility, deep clean the site and not accept any further waste until this has been completed. The EA would also be provided with written evidence these measures have taken place.

6.4.4 If the site cannot accept waste, it would be diverted to the company's other permitted site nearby at:

- Port Of Boston, Boston, Lincolnshire, PE21 6BN (EPR/HB3507UM) situated approximately 500m to the west and 50m to the north of the site. This permit is in the name of New Earth Solutions (West) Limited.

6.5 Operational failure

6.5.1 The manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures, which result in the closure of the site, will be recorded in the site diary.

6.5.2 All repairs to site security will be made within on the discovery of the damage if possible and the site will be made secure until the repair has been carried out.

6.5.3 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found, where possible. If a repair is not possible by the end of the working day and a potential breach of permit conditions may occur, the EA will be contacted to agree a suitable timescale for repair.

6.5.4 All defects and problems likely to give rise to odour will be recorded on the form POB/RF/4 or the operators own recording procedures with repairs/solutions being carried out immediately; neighbours will be alerted if the problem cannot be rectified immediately and provided a timescale when the problem will cease.

6.6 OMP Management

6.6.1 This OMP will be reviewed at least annually unless it becomes apparent that the activities are giving rise to pollution outside the site due to odour, in which case it will be revised

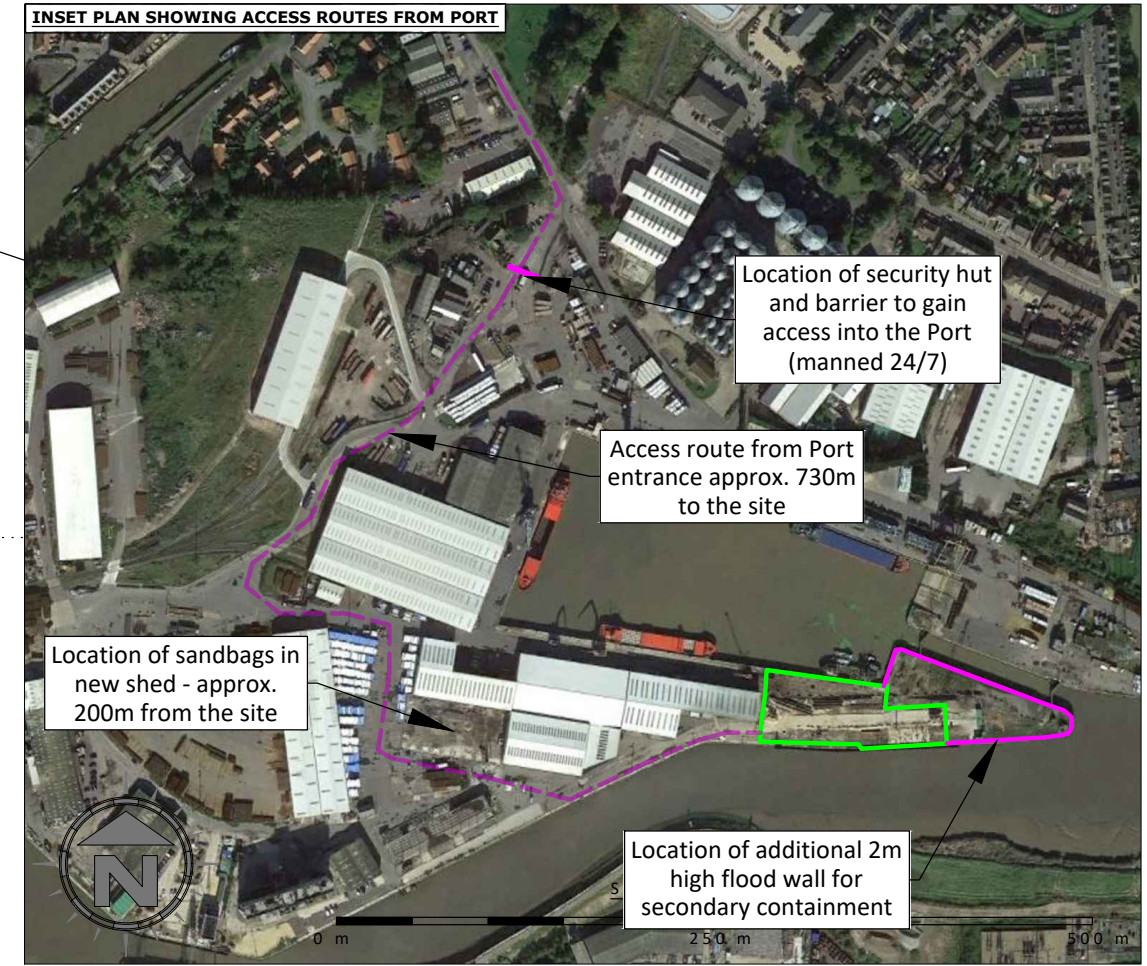
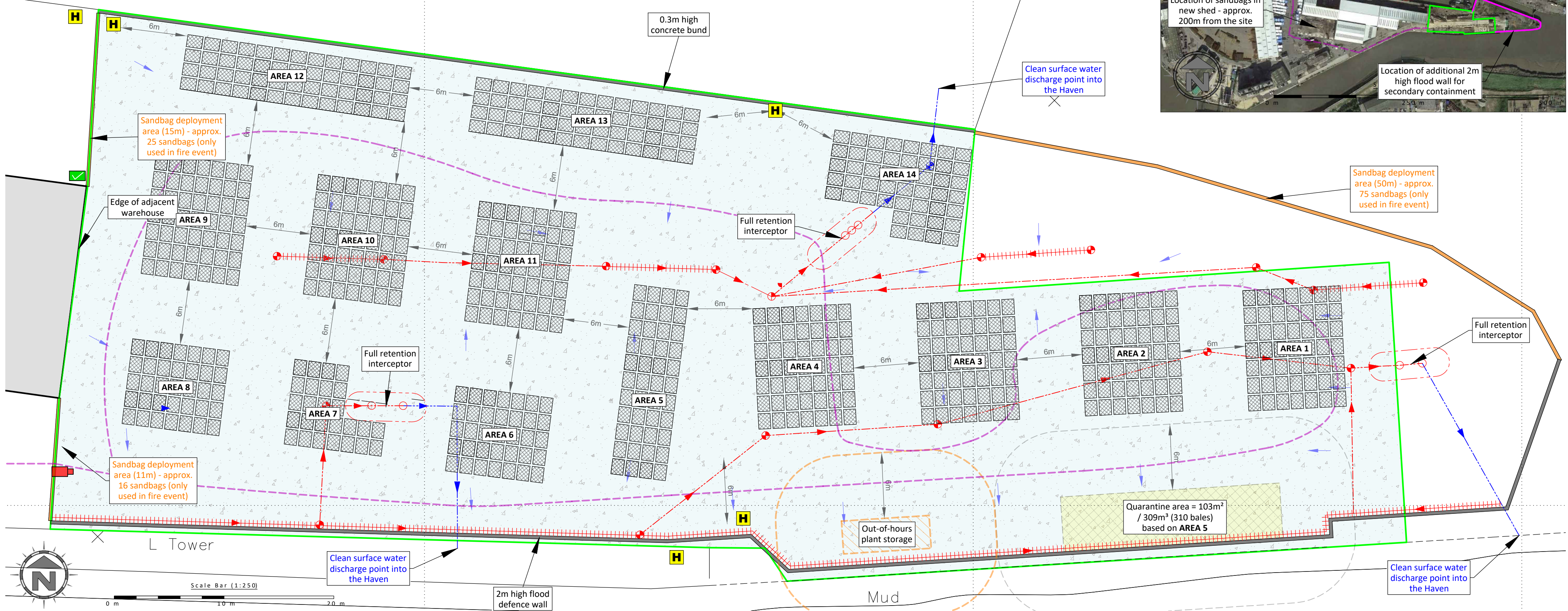
within 7 days and a copy forwarded to the EA for approval before implementation. It may also be revised upon request from EA, should the permit be varied, transferred etc.

Appendix I

Drawings

Plan Ref	Description	Storage type	Containment / type	Height of firewall (m)	Max Width (m)	Max Length (m)	Max storage height (m)	Approx. Area (m ²)	Conversion factor used	Approx. volume (m ³)	Approx. no. of bales	Approx. tonnage	Max storage time
AREA 1	Storage of RDF/SDF bales	Bale stack (four high)	Free-standing bale stack	N/A	9	11	4.4	99	1	436	196	274	<12 weeks
AREA 2	Storage of RDF/SDF bales	Bale stack (four high)	Free-standing bale stack	N/A	9	11	4.4	99	1	436	196	274	<12 weeks
AREA 3	Storage of RDF/SDF bales	Bale stack (four high)	Free-standing bale stack	N/A	9	11	4.4	99	1	436	196	274	<12 weeks
AREA 4	Storage of RDF/SDF bales	Bale stack (four high)	Free-standing bale stack	N/A	9	11	4.4	99	1	436	196	274	<12 weeks
AREA 5	Storage of RDF/SDF bales	Bale stack (four high)	Free-standing bale stack	N/A	5	20	4.4	100	1	440	208	291	<12 weeks
AREA 6	Storage of RDF/SDF bales	Bale stack (four high)	Free-standing bale stack	N/A	9	8	4.4	72	1	317	140	196	<12 weeks
AREA 7	Storage of RDF/SDF bales	Bale stack (four high)	Free-standing bale stack	N/A	8	9	4.4	72	1	317	104	146	<12 weeks
AREA 8	Storage of RDF/SDF bales	Bale stack (four high)	Free-standing bale stack	N/A	9	8	4.4	72	1	317	140	196	<12 weeks
AREA 9	Storage of RDF/SDF bales	Bale stack (four high)	Free-standing bale stack	N/A	9	11	4.4	99	1	436	196	274	<12 weeks
AREA 10	Storage of RDF/SDF bales	Bale stack (four high)	Free-standing bale stack	N/A	9	11	4.4	99	1	436	196	274	<12 weeks
AREA 11	Storage of RDF/SDF bales	Bale stack (four high)	Free-standing bale stack	N/A	9	11	4.4	99	1	436	196	274	<12 weeks
AREA 12	Storage of RDF/SDF bales	Bale stack (four high)	Free-standing bale stack	N/A	5	20	4.4	100	1	440	208	291	<12 weeks
AREA 13	Storage of RDF/SDF bales	Bale stack (four high)	Free-standing bale stack	N/A	5	20	4.4	100	1	440	208	291	<12 weeks
AREA 14	Storage of RDF/SDF bales	Bale stack (four high)	Free-standing bale stack	N/A	9	12.6	4.4	95	1	418	192	269	<12 weeks

Conversion factors
 Conversion factors for waste piles are worked out using the following methods set out by The Environment Agency
 The maximum length width pile is based on the largest dimension – the volume of the pile has been calculated using the area x height x relevant conversion factor
 Conversion of 1 for materials stored as waste/bale stacks
 Each bale measures 1.1m (W) x 1.4m (L) and 1.1m (H), 1.54m² / 1.694m³



Oaktree Environmental Ltd
 Waste, Planning and Environmental Consultants

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DRAWING TITLE
 SITE LAYOUT & FIRE PLAN

CLIENT
 Port of Boston Limited

PROJECT/SITE
 Port of Boston, St John's Road, Boston, Lincolnshire
 PE21 6BN

SCALE @ A2
 1:250

CLIENT NO
 3401

JOB NO
 001

DRAWING NUMBER
 POB/3401/03

REV
 -

STATUS
 Issued

DRAWN BY
 CP

CHECKED
 --

DATE
 27.02.24

- Key:**
- Permit boundary
 - Waste storage areas
 - Quarantine area
 - Impermeable concrete surface with sealed drainage
 - Surface water drainage fall direction
 - ACO / surface water drains & direction
 - Potentially contaminated surface water underground drainage
 - Clean/treated water
 - Catchment pits
 - Manholes (contaminated and clean)

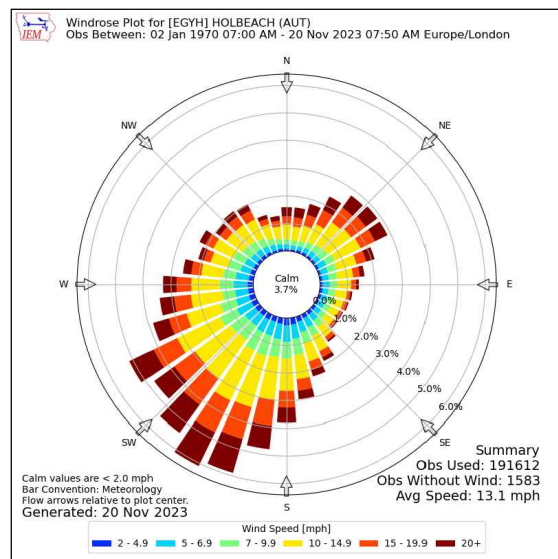
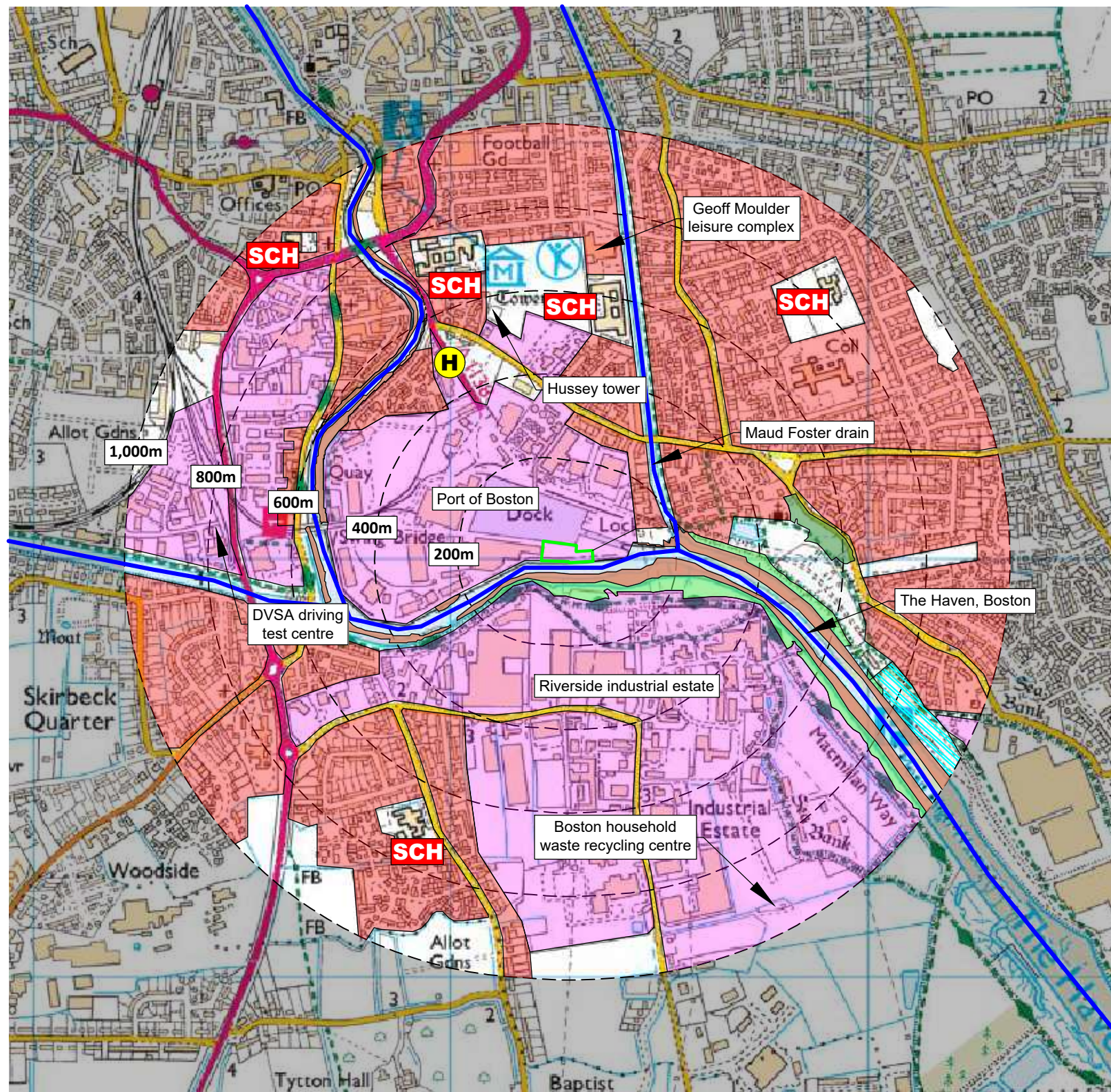
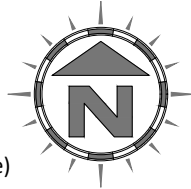
- Out-of-hours plant storage
- H Location of fire hydrants
- Fire assembly point
- Sandbag (fire water containment) location
- Access route for emergency services
- 0.3m high concrete bund 2wall and 2m high flood barrier locations

NOTES
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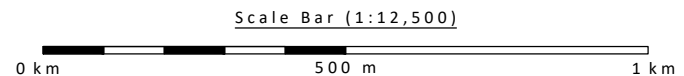
REVISION HISTORY			
Rev:	Date:	Init:	Description:
-	28.02.24	CP	Initial drawing

KEY:

- Permit boundary
- Main River
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Class A, B, C roads
- H Nearest fire hydrant
- Railway line
- SCH School
- ↻ Woodland areas
- Priority habitat inventory (deciduous woodland)
- Priority habitat inventory (Mudflats)
- Priority habitat inventory (Coastal Saltmarsh)
- Local nature reserves



Compass Wind Rose for (EGYH) Holbeach (AUT)
Period 1970-2023
- source: Iowa State University



NOTES

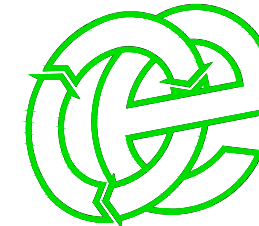
1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be from the South-west.

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	28.02.24	JH	Initial drawing

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
RECEPTOR PLAN

CLIENT
Port Of Boston Ltd

PROJECT/SITE
St John's Road, Boston, Lincolnshire PE21 6BN

SCALE @ A3 1:12,500 **CLIENT NO** 3401 **JOB NO** 001

DRAWING NUMBER POB/3401/04 **REV** - **STATUS** Issued

DRAWN BY JH **CHECKED** CP **DATE** 28.02.24

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Appendix II

Record Forms

Odour Diary			Sheet No	
Name:		Address:		
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 1-5):				
How long did go on for? (time):				
Was it constant or intermittent in this period:				
What do believe the source/cause to be?				
Any actions taken or other comments:				

Intensity (Detectability)

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

**PORT OF BOSTON LIMITED
COMPLAINTS REPORT FORM (POB/RF/7)**

Date Recorded:	Reference Number:
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Environmental Management System (EMS)	
Date changes implemented	
Form completed by	
Signed	
Date completed	

COMPLAINT RECORDING PROCEDURE:

Any complaints received will be recorded on form POB/RF/7. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager will complete the form.

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

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