

# Haye Down Waste Transfer Station

784- B033235

## Odour Management Plan

Environmental Permit Application

West Devon Borough Council

November 2025

Document prepared on behalf of Tetra Tech Limited. Registered in England number 01959704



Tetra Tech Limited. Registered in England number: 01959704

Tetra Tech Manchester, 2nd Floor, 11 York Street, Manchester, M2 2AW  
Registered Office: 3 Sovereign Square, Sovereign Street, Leeds, United Kingdom, LS1 4ER

# Document control

If you require this document in an alternative format, such as large print or a coloured background, please request this from the author or your Tetra Tech contact.

<b>Document:</b>	Odour Management Plan
<b>Document name:</b>	
<b>Project:</b>	Haye Down Waste Transfer Station
<b>Client:</b>	West Devon Borough Council
<b>Project number:</b>	784- B033235
<b>File origin:</b>	Document1

<b>Revision:</b>		<b>Prepared by:</b>	Gemma Allan
<b>Date:</b>	July 2025	<b>Checked by:</b>	Andrew Bowker
<b>Status:</b>	<b>Draft</b>	<b>Approved by:</b>	Andrew Bowker
<b>Description of revision:</b>			

<b>Revision:</b>	<b>D2</b>	<b>Prepared by:</b>	Andrew Bowker
<b>Date:</b>	August 2025	<b>Checked by:</b>	
<b>Status:</b>	<b>Draft</b>	<b>Approved by:</b>	
<b>Description of revision:</b>	<b>Updated following client and operator comments</b>		

<b>Revision:</b>	V1	<b>Prepared by:</b>	Gemma Allan
<b>Date:</b>	November 2025	<b>Checked by:</b>	Andrew Bowker
<b>Status:</b>	Final	<b>Approved by:</b>	Andrew Bowker
<b>Description of revision:</b>	Issue to EA		

## Table of contents

<b>1.0</b>	<b>Site Description and management .....</b>	<b>4</b>
<b>2.0</b>	<b>Description of Waste Activities .....</b>	<b>6</b>
<b>3.0</b>	<b>Source, Pathway, Receptors Characterisation.....</b>	<b>8</b>
<b>4.0</b>	<b>Odour Management and Control .....</b>	<b>14</b>
<b>5.0</b>	<b>Monitoring .....</b>	<b>16</b>
<b>6.0</b>	<b>Abnormal Events and Contingency Plans .....</b>	<b>19</b>
<b>7.0</b>	<b>Complaints Management and Reporting .....</b>	<b>22</b>

## List of tables

<b>Table 1: Odorous Materials.....</b>	<b>8</b>
<b>Table 2: Source-Pathway-Receptor Routes from Waste Activities at the Site .....</b>	<b>9</b>
<b>Table 3: Environmental Receptors Within 1km of the Site .....</b>	<b>11</b>
<b>Table 4: Contingency Plan.....</b>	<b>20</b>

## List of figures

<b>Figure 1: Tavistock Prevailing Wind Direction.....</b>	<b>13</b>
---	-----------

## Drawings

Proposed Site Layout – BDY-03

Permit Boundary Plan - WDB/B033235/PER/01

Environmental Receptor Plan - WDB/B033235/REC/01

## Appendices

Appendix A – Daily Odour Inspection Form

Appendix B – Odour Complaint Investigation Form

## 1.0 Site Description and management

### 1.1 Report Context

- 1.1.1 This Odour Management Plan (OMP) has been prepared by Tetra Tech on behalf of the Operator, West Devon Borough Council (The Council), in connection to their permitted facility located at Haye Down Industrial Estate (the site), Haye Down, Tavistock, Devon, PL19 0NN, at approximate National Grid Reference SX 44645 79630. The site location and permit boundary are presented on Drawing Number WDB/B033235/PER/01.
- 1.1.2 The site is currently operated by FCC Recycling (UK) Ltd on behalf of The Council. At present the site is being operated under a number of exemptions (S1 Storing wastes in secure containers, S2 Storing wastes in a secure place, T10 Sorting mixed wastes and T4 preparatory treatments (baling, sorting, shredding, etc) but there is no environmental permit.
- 1.1.3 A Local Enforcement Position Statement has been submitted to the Environment Agency to allow the continued operation of the facility, which is currently in breach of the waste exemptions, subsequently, it has been suggested that a bespoke environmental permit be applied for.
- 1.1.4 Consequentially, The Council are seeking to apply for a new bespoke permit for the operation of a Household, Commercial and Industrial Waste Transfer Station that will process a maximum of 25,000 tonnes per annum of non-hazardous waste.
- 1.1.5 All site operations are operated under documented management procedures. All operations are controlled by an Environmental Management System (EMS) comprising quality, environmental and health and safety requirements. A summary of the EMS is provided as an appendix to the Operating Techniques (Appendix C).
- 1.1.6 The OMP is to be reviewed as a minimum on an annual frequency by the Site Manager to ensure it reflects the latest guidance, legislation and the site operations.

### 1.2 Objectives of the Odour Management Plan

- 1.2.1 This OMP is a working document, intended to be used as a reference document for operational staff on a day-to-day basis. The Council will implement the plan to ensure that all reasonable measures are taken to control odour emissions, and in the event that an adverse impact is caused, prompt action will be taken to identify the source and apply corrective measures. It provides a schedule of actions that will be taken to minimise odour impact and details site management procedures for the management and monitoring of odour.
- 1.2.2 This document has been prepared in accordance with Environment Agency's guidance note 'H4 Odour Management'.
- 1.2.3 The OMP will adopt a Source → Pathway → Receptor model with an emphasis on implementing effective and robust controls for odour abatement at the earliest stages possible (i.e., at source).

The guidance acknowledges that assessment and control of odour can be difficult due to dispersal and the episodic nature of odour events.

1.2.4 The 'H4' guidance provides a regulatory framework by which a permitting officer can ensure compliance by the provision of specific conditions.

1.2.5 This document provides a summary of the physical and management controls that will be employed to minimise odour release. It provides a site-specific assessment of the potential sources of odour; the pathways odour can take from the site and the receptors it is likely to impact. The potential release points of odour are identified and the management systems to prevent and control fugitive odour emissions. Monitoring and reporting systems are described in addition to emergency contingency plans.

### **1.3 Maintenance and Review of OMP**

1.3.1 The implementation and dissemination of this OMP will be the responsibility of the Site Manager, supported by other staff. The Site Manager can delegate certain tasks as required, although ultimate responsibility will remain with them.

1.3.2 A nominated deputy will be appointed for all times when the Site Manager is not on site. In such circumstances, it will be the nominated deputy's responsibility to ensure that the requirements of the OMP are adhered to.

1.3.3 The OMP is to be reviewed as a minimum on an annual frequency by the Site Manager to ensure it reflects the latest guidance, legislation, and the site operations.

1.3.4 Staff training will be a key aspect of ensuring that odour can be controlled through effective management during daily operations. All site operatives will therefore be trained via toolbox talks to deal with odour management issues. Annual refresher toolbox talks will ensure that the requirements of the OMP are reinforced.

### **1.4 Relevant Sector Guidance**

1.4.1 This OMP has been prepared with consideration to the following guidance documents: -

- Control and monitor emissions for your environmental permit (February 2016); and,
- H4 Odour Management - How to comply with your environmental permit (September 2022).

## 2.0 Description of Waste Activities

### 2.1 General Overview

2.1.1 The site will operate a Household, Commercial and Industrial Waste Transfer Station that will process a maximum of 25,000 tonnes per annum of non-hazardous waste.

2.1.2 The site provides a facility for the storage and 'bulking up' of household, commercial and industrial waste. There will be no mechanical treatment of waste on site. Treatment will only consist of manual sorting and separation.

### 2.2 Permitted Waste Types

2.2.1 The site is designed to receive the following wastes: -

- Plastics;
- Dry mixed recycling;
- Cardboard;
- Batteries;
- Printer Cartridges;
- Clothing/Textiles;
- Glass;
- Food Waste;
- Metals; and,
- Paper/Tetra.

2.2.2 The waste types to be accepted at the site are detailed within the Operating Techniques document provided as Appendix C of this permit application.

### 2.3 Process Description

2.3.1 Materials will be delivered to the site in RCV's or tipping vehicles and either end tipped directly into the bays or stockpiles or deposited on the hardstanding in front of the bays or stockpiles, where a loading shovel will be operated to move the material into bays or stockpiles.

2.3.2 The majority of waste will be stored within designated storage bays for forward disposal or recovery within the WTS building. Pedestrian doors are closed when not in direct use.

2.3.3 The only waste streams that will be stored outside are mixed glass (in a designated bay) and food waste (in a dedicated container)).

2.3.4 An indicative layout of the Waste Transfer Station is provided on Drawing Number BDY-03.

## 2.4 Operating Hours

2.4.1 The proposed operating hours of the Facility are as follows: -

- 06:00-18:00 Monday – Friday; and,
- 06:00 – 18:00 Saturday.

2.4.2 No works will be undertaken on Sundays or Bank Holidays other than emergency cover.

## 3.0 Source, Pathway, Receptors Characterisation

### 3.1 Inventory of Odorous Waste Streams

- 3.1.1 The proposed activities are limited to the handling, processing, storage, and transfer of wastes, therefore the main source of odour considered by this report relate to these activities only.
- 3.1.2 This section provides an inventory of all potential odour sources and the odour generating sources at the site are identified as follows.

#### General Municipal/Residual Black Bag

- 3.1.3 General municipal waste (EWC 20 03 01) accepted at the site is from municipal kerbside collections and commercial waste from single source contract. General municipal waste will be collected on a fortnightly basis and therefore the waste will be up to 2 weeks old when it arrives on site.. General municipal wastes are only stored on site prior further transport to another site for processing. No processing of this type of wastes will be undertaken on site. General municipal wastes will be stored within the transfer station building in a separate bay for a maximum of 72 hours. General municipal waste will contain a certain percentage of putrescible waste but the odour generation from this source is considered to be medium.

#### Recyclable and Bulky Waste

Dry recyclables and bulky wastes may be lightly contaminated with residual waste, however it is considered that the potential for an odour source is negligible and as such is not discussed further in this OMP.

**Table 1: Odorous Materials**

Odourous and potentially odourous materials	Odour potential	Maximum quantity on site at any one time	Maximum time on site	Location on Site	Source and age of waste on arrival
General Municipal/ Residual black Bag  <b>EWC codes</b> 20 03 01	Medium	20 tonnes	72 hours	Within transfer station building	Municipal waste from Kerbside collection Commercial waste from single source contract  Up to 2 weeks old when arriving on Site
Packaging  <b>EWC Codes</b>	Medium	30 Tonnes	72 hours	Within transfer station building	Municipal waste from Kerbside collection

15 01 06, 15 01 01, 15 01 02, 15 01 04, 15 01 07 15 01 09					Commercial waste from single source contract  Up to 2 weeks old when arriving on Site
Food waste  20 01 08	High	14 Tonne	48 Hours	Within sealed container	Segregated kerbside collection as a function of Simpler Recycling Legislation  Up to 2 weeks old when arriving on site.
Recyclable and Bulky Wastes	The potential for an odour source is negligible and as such is not discussed further in this OMP.				

3.1.4 The key aspects of the process which may lead to odour emissions are identified in the Table below and the control measures that will be used are detailed in Table 5.

**Table 2: Source-Pathway-Receptor Routes from Waste Activities at the Site**

Source	Pathway	Receptor	Type of impact
Receipt of waste on site.	Atmospheric dispersion	Receptors listed in Table 3.	Odour annoyance
Storage of waste.	Atmospheric dispersion		Odour annoyance

### 3.2 Odour Pathway Characterisation

3.2.1 The principal mechanism for the transit of odorous emissions from site operations to adjacent sensitive receptors is via ambient air. The distance and direction that these emissions will be carried is determined by the following factors: -

- Source related pathways;
- Meteorological conditions; and,
- Topography.

#### Source Related Pathways

3.2.2 Odours emitted from the sources identified above are emitted to air and have the potential to be conveyed to the nearby receptors via transfer through the atmosphere.

3.2.3 The pathway an odorous emission takes from a site may depend on the specific source term and/or location it arises from. The nature of the source related pathway could also influence the scale of impact on a sensitive receptor.

## **Meteorological Conditions**

### *Wind Direction*

- 3.2.4 The main controlling factor in determining the pathway of odour is the ambient meteorological conditions. This is fundamental to the transportation of odour to sensitive receptors.
- 3.2.5 The prevailing wind direction will determine which receptors will be affected and at what frequency. Meteorological data has been used from Tavistock from [www.meteoblue.com](http://www.meteoblue.com) which is considered to be representative of conditions within the vicinity of the application site. According to the wind rose data for the area, the prevailing winds in the local area are from the west.
- 3.2.6 Areas at most risk from an odorous emission, should it occur, are therefore located east of the site which is a predominantly a rural area.

### *Wind Velocity*

- 3.2.7 Wind velocity will affect the distance an odour emission will travel. Conversely, increased wind speed could also beneficially improve dispersal. However, those receptors closest to the site itself are still at the highest risk of a negative impact.

### *Air Temperature*

- 3.2.8 Warm air may carry odours upwards by convection for their dispersal away from the site. However, warm weather will encourage the onset of biodegradation of exposed or temporarily stored wastes and therefore increase odour potential. Therefore, in the summer months the risk of odour emissions is greater, and this must be taken into account in the site procedures.

### *Adverse Weather Conditions*

- 3.2.9 Unusual weather conditions, such as a heat wave, may increase the risk of odour emissions from the site. Site staff will be vigilant to unusual trends in the meteorological data or forecasts which may indicate strong winds or extremes of temperature which may cause a potential problem.

### *Topography*

- 3.2.10 The topography of the site and the surrounding area can influence the potential dispersion of odour emissions. The local topography is relatively flat with few features of significance. Therefore, it is unlikely that the topography would have a significant impact on the odour emissions beyond the site boundary.

### 3.3 Identification of Sensitive Receptors

3.3.1 The potential receptors within 1km of the site's Environmental Permit boundary have been identified in the table below and are presented on Drawing Number WDB/B033235/REC/01.

**Table 3: Environmental Receptors Within 1km of the Site**

ID	Receptor	Direction from Operational Area	Minimum Distance from the site (approx. m)
<b>Domestic Dwellings</b>			
1	Haye Down Industrial Estate Dwellings	E	55
2	Haye Down Farm Residencies	E	360
3	Beech Farm Residencies	S	640
4	Higher Haye Residencies	S	970
5	Haye Comb Farm Residencies	SW	520
6	Longcross Properties	SW	840
7	Quither Down Farm Residencies	NW	680
8	Residency (Near A&M Pallets)	W	70
<b>Commercial and Industrial Premises</b>			
9	J A McLaughlin	E	290
10	Haye Down Industrial Estate	-	Adjacent
11	A&M Pallets	W	125
12	Industrial Property	N	610
13	Industrial Property (Haye Down Farm)	SE	240
14	Industry (Beech Farm)	S	755
15	Industry – Higher Haye	SW	970
16	Longcross Industry	SW	875
17	Industry	NW	745
18	Commercial Lamp Supplies	NE	410
19	Week Cottages Road Industry	NE	980
<b>Highways or Minor Roads</b>			
20	Week Cottages	NE	995
<b>Sensitive Land Uses</b>			
21	Haye Down Farm	E	365
22	Beech Farm	E	665
23	Quither Down Farm	NE	515
24	Haye Combe Farm	SW	515
25	Longcross Farm	SW	825
<b>Priority Habitats</b>			
26	Haye Down Industrial Estate Deciduous Woodland	-	Adjacent
27	A&M Pallets Deciduous Woodland	W	95
28	Quither Down Farm Deciduous Woodland	NE	620
29	Beech Farm Deciduous Woodland	S	470
30	Haye Combe Farm Deciduous Woodland	SW	355

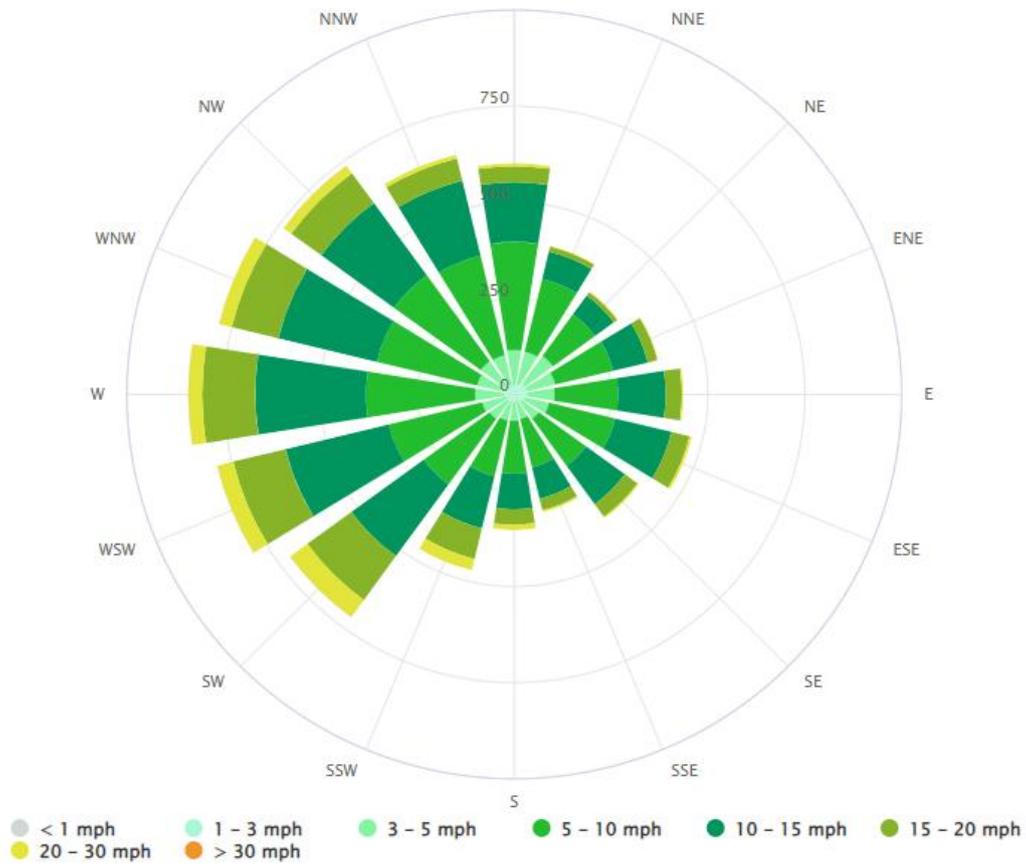
31	Longcross Deciduous Woodland	W	900
32	River Lumburn Deciduous Woodland	SE	990
<b>Listed Buildings and Scheduled Monuments</b>			
33	Bowl barrow	E	735
34	Bowl barrow 2	E	960
<b>Surface Water e.g. rivers and streams</b>			
35	Small Pond	N	395
36	Quither Common Stream	NE	420
37	River Lumburn Tributary	SW	295
38	River Lumburn	SE	750
<b>Groundwater (sensitivity)</b>			
According to the Multi-Agency Geographic Information for the Countryside's (MAGIC) website, the site is not situated within a Source Protection Zone). With regards to aquifers, the MAGIC website shows that the majority of the site overlies Secondary A Bedrock aquifer. The Superficial Drift Aquifer also comprises a Secondary A Aquifer.			

- 3.3.2 The receptors likely to be most sensitive to an odour nuisance arising from the site are domestic dwellings or commercial offices. As detailed in Table 2, the closest residential area to the site is located approximately 55m east. As this site was previously operational under waste exemptions and is situated on an industrial estate, it is not anticipated that there will be an increase in odourous emissions.

## 3.4 Meteorological Data

- 3.4.1 The prevailing wind direction will determine which receptors will be affected and at what frequency.
- 3.4.2 Meteorological data has been used from Tavistock from [www.meteoblue.com](http://www.meteoblue.com) which is considered to be representative of conditions within the vicinity of the application site. According to the wind rose data for the area, the prevailing wind in the local area is from the west (W) as shown in Figure 1 below.

Figure 1: Tavistock Prevailing Wind Direction



## 4.0 Odour Management and Control

### 4.1 Waste Acceptance

- 4.1.1 The site operators will ensure that capacity is available on-site before accepting waste. In particular, if the waste storage area is full, all inbound loads of waste must be diverted until the quantity of waste on site has been reduced. If loads are turned away, then this will be recorded in the site diary.
- 4.1.2 Only waste types detailed within the environmental permit will be accepted at the site.
- 4.1.3 Upon arrival, all documentation accompanying the load shall be checked at the weighbridge, and shall include, but not be limited to the Carriers Certificate of Registration and Duty of Care Waste Transfer Note.
- 4.1.4 . All loads will be visually inspected on site as the waste is discharged from the delivery vehicles.
- 4.1.5 Wastes that are believed to cause an odour problem will not be accepted at the site. Should the situation occur where a load with wastes that could cause an odour problem is delivered to site, the waste will be removed by the end of the working day. A load rejection form will be completed, and a copy of this form will be kept on site. Recording of such information will allow the site to identify any sources of waste which persistently do not meet acceptance requirements enabling remedial action to be taken.

### 4.2 Waste Storage

- 4.2.1 All wastes are stored within bays inside the waste transfer station building equipped with roller shutter doors.
- 4.2.2 The only waste streams that will be stored outside are mixed glass (in a designated bay) and food waste (within a sealed container)
- 4.2.3 If deemed necessary by the Technically Competent Manager (TCM), an odour suppression system will be utilised in the waste transfer station building.

### 4.3 Waste Handling

- 4.3.1 Material will be delivered and removed from the site as described in Section 2.3 above.
- 4.3.2 Waste material will be moved in a regular and consistent manner and the site will operate a first in and first out policy on all waste streams to ensure that waste is removed from site as quickly as possible to prevent further degradation and minimise potential generation of odour.
- 4.3.3 Storage times will be monitored by the Site Manager to ensure that the oldest materials are prioritised for transfer off site. In addition, it will ensure that no putrescible waste is stored for no longer than 72 hours.

## 4.4 House Keeping

- 4.4.1 The site will be subjected to a good housekeeping regime which assists with the aim of proactive management and associated environmental compliance. Daily inspections will be undertaken at the site via the Daily/Weekly Checklist (Appendix A). The checklist will be completed by the Site Manager or designated staff and signed off at least weekly by the TCM for the site.
- 4.4.2 In general, ongoing inspection and cleaning is undertaken on site. Daily inspection and cleaning are undertaken on equipment. Waste storage area is cleaned regularly when storage area is emptied as per the site and materials turnaround and as and when requested by the site manager.
- 4.4.3 In addition to operating a first in and first out policy the waste storage areas will be regularly emptied to allow it to be cleaned thoroughly.

## 4.5 Odour Checks

- 4.5.1 Daily odour checks are carried out to identify any potential odours as detailed in Section 5.2 below. Should any odour be identified, then contingency action shall be followed.

## 5.0 Monitoring

### 5.1 Overview

- 5.1.1 Prevention is viewed as the most effective means of controlling odour before an impact occurs. The Source → Pathway → Receptor model allows for the identification of the critical control points where odour can arise, how it can travel to a receptor and the likely impact.
- 5.1.2 It is intended that the odour management system will mitigate any potential odour impacts of the activity on the identified receptors. Should complaints be received, procedures will be in place to effectively deal with the issue in a sensitive, efficient, and auditable manner.
- 5.1.3 The controls for each source term are detailed in previous sections of this report. The management of those controls will be based on the on-going monitoring regime at site. The monitoring regime can work as an early warning system to potential problems (e.g., meteorological monitoring) or a diagnostic tool to establish the cause of an odour event (e.g., perimeter monitoring).

### 5.2 Monitoring

- 5.2.1 The site manager or nominated person will be responsible for ensuring that daily inspections are made of the site and its perimeter in order to identify any sources of odour and to establish whether any odours are discernible. Regular odour checks are undertaken on site as detailed below. However, the site management do not solely rely on the odour checks and odour is continually assessed by all staff present on site and any odours identified outside the regular inspections are reported to site management for investigation.
- 5.2.2 Generally, the site supervisor will carry out the daily odour checks. However, in the event of an odour issue, due to the potential for desensitisation to odours, odour monitoring will be carried out by site personnel who do not work closely with handling waste e.g., office staff. These personnel will be the most suitable to detect any fugitive odour outside the site. Routine odour monitoring shall be undertaken, where possible, during hours of waste acceptance and prior to those assessing the odour having entered operational areas where they may be likely to be exposed to odours.
- 5.2.3 Those undertaking odour monitoring should try to avoid where possible strong food or drinks, including coffee, for at least half an hour beforehand and strong scented toiletries and deodorisers in any vehicle used during the assessment. Where possible the use of perfume sprays, cleaning products etc are avoided within the offices to prevent exposure.
- 5.2.4 Should staff have been exposed to odours within the facility or any scented products, food, or drinks prior to undertaking odour monitoring then they may request that the monitoring is undertaken by someone else. If this is not possible then the assessor may leave site for a period of time (approximately 15 mins or more) or complete the assessment but ensure that a follow up assessment is carried out after half an hour.

- 5.2.5 Routine odour monitoring should, where possible, be undertaken by staff who have undergone odour acuity assessment to ensure a suitable detection threshold for odours.
- 5.2.6 Odour monitoring is carried out using sniff testing to check ambient air on or off site.
- 5.2.7 Off-site olfactory monitoring will be carried out with reference to the H4 Odour Management Guidance, with an odour assessment form being completed. All site personnel will be responsible for reporting any odour problems immediately to the site manager or the next level of management if the manager is not available.
- 5.2.8 The form used for odour inspections and assessments is included within Appendix A.
- 5.2.9 All odour assessments are undertaken using the intensity scale detailed below which is in line with the H4 Odour Management Guidance. This ensures consistency and enables odour assessments taken by Site Management to be compared with odour assessments taken in conjunction with or independently by the Environment Agency.
- 0. None
  - 1. Very Faint
  - 2. Faint
  - 3. Distinct
  - 4. Strong
  - 5. Very Strong
  - 6. Extremely Strong

## 5.3 Odour Checks

- 5.3.1 Odour checks are undertaken on a daily basis at the site boundary. Odour checks are recorded on the daily and weekly EMS Checklist detailed within the Site Management Plan (Appendix C of this Application) and included in Appendix A.
- 5.3.2 Any odours identified must be clearly marked on the inspection form.
- 5.3.3 Should a distinct odour be identified during a routine odour assessment then an investigation on the source of the odour will be undertaken.
- 5.3.4 Upon identification of an incident or failure of a control measure, then in consultation with the Site Manager the monitoring frequency might be increased too twice daily if necessary.
- 5.3.5 Should an odour be attributed to the site and the odour sources cannot be resolved within a timely manner then an odour inspection shall be undertaken at key sensitive receptors and recorded on the external odour assessment survey which will clearly indicate whether or not odour was detected.

- 5.3.6 Should an odour attributed to the site be recorded external to the site as detailed above then an investigation shall be carried out and recorded on the odour assessment form.
- 5.3.7 The site manager will be informed immediately of any findings of odour attributed to the site and will authorise remedial measures to be taken. Remedial actions may include but be not limited to: -
- Checking storage areas to identify the source of the odour to a particular waste;
  - Removal of the odorous waste at the earliest opportunity and within 24 hours;
  - Cleaning of storage area; and,
  - Use of an odour suppression system.

## 6.0 Abnormal Events and Contingency Plans

### 6.1 Abnormal Events

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

#### Temperature Inversions

- 6.1.2 The conditions that can facilitate a temperature inversion (warm odorous air trapped beneath a layer of cold air under still conditions) can be predicted by simple regard to local and regional weather forecasts. If such conditions look possible olfactory monitoring will focus on the down-flow boundaries of the site to monitor for the early signs of low-level odour movement.

#### Storm Conditions

- 6.1.3 Severe storms may result in disruption to the removal of materials from site. However severe storm conditions are unlikely to be prolonged. Therefore, it is considered unlikely that this will cause a major odour issue on site as putrescible waste will unlikely be stored for more than 72 hours.

#### Hot Conditions

- 6.1.4 There is a greater potential to generate odour during warm weather and therefore an increase in ambient air temperature may result in increased odour. During prolonged periods of hot weather olfactory monitoring frequency will be increased and any wastes identified as generating an odour will be prioritised for removal from site.

### 6.2 Implementation of the Contingency Plan and/or Emergency Plan

#### Implementation of the Contingency Plan and/or Emergency Plan

- 6.2.1 Wastes that are believed to cause an odour problem will not be accepted at the site. Should the situation occur where a load with wastes that could cause an odour problem is delivered to site, the waste will be immediately placed in a designated bay/s and removed by the end of the working day if received prior to 12noon, or, if received after 12 noon, removed by 12 noon the following morning (excluding Sunday where it will be removed the next permitted day, Monday). A load rejection form will be completed, and a copy of this form will be kept on site.
- 6.2.2 Should site maintenance be required that would significantly disrupt normal operations and could have the potential to cause an environmental impact (for example during emergency situations),

staff will initially inform the site manager who will in turn inform the Environment Agency. Site staff will implement measures to store or divert waste as required.

6.2.3 The contingency plan in place at the site is discussed in more details in the Table below.

**Table 4: Contingency Plan**

ISSUE	POTENTIAL IMPACT ON SITE OPERATIONS	PERIOD	MITIGATION PLAN
Storage capacity full. Site not available as a storage place	This could potentially mean that the site does not have capacity to accept waste for deliveries	1 day	Waste will be directly delivered to a suitable alternative site.
		Up to 72 hours	As above. Risk assess odour generation and impact by increasing Odour Assessment. Address mechanical failure and/or issues. Plant can be hired at short notice from preferred contractor.
Storage capacity full due to plant mechanical failure	This could potentially mean that the site does not have capacity to accept waste for deliveries and to transfer waste off site	1 day	Address mechanical failure and/or issues. Plant can be hired at short notice from preferred contractor or an appropriately permitted.
		Up to 48 hours	As above. Risk assess odour generation and impact by increasing odour Assessment.
		Up to 72 hours	Waste will be directly delivered to a suitable alternative site.  Address mechanical failure and/or issues.  Plant can be hired at short notice from preferred contractor.  Identify alternative long-term storage area.
Waste removal halted storm conditions	Difficulties in removing waste could lead to waste accumulating on site.	1 day s	Receive waste and store up to the permit capacity limit and for no-longer than the maximum duration.
		Up to 72 hours	Risk assess odour generation and impact by increasing odour Assessment. Implement medium term solution i.e., transfer to alternative site.

**Review and Update of Contingency and Emergency Plans**

- 6.2.4 The Contingency Plan and Emergency Plan will be reviewed following any incident where they have had to be followed. They will be updated as necessary incorporating the outcome of any lessons learned

## 7.0 Complaints Management and Reporting

### 7.1 Investigation and Records

- 7.1.1 Any complaints received at the facility or via the regulatory bodies including the Environment Agency and Local Authority, will be recorded and The Council will instigate further olfactory monitoring at the location of the complaint and on site to determine the extent and location of the odour and the odour causing materials. Where possible, as much information and detail about the complaint will be recorded, whether this is from the relevant authority or complaint direct to site. This information will assist in the investigation and determining the source of the odour.
- 7.1.2 All complaints and queries will be logged in accordance with the integrated management system as soon as in practicably possible. All complaints logged will be subject to investigation and complainants responded to within 48 hours of receipt. All responses will be through trained and experienced staff.
- 7.1.3 Complaints investigations are carried out by site management that are not regularly exposed to the odours and therefore are able to assess the level of odour objectively. A copy of the complaints investigation form is provided in Appendix B.
- 7.1.4 Should the complaint be received out of operational hours then site management shall try to attend site as soon as possible to carry out an investigation dependent upon availability.
- 7.1.5 The Environment Agency shall be informed of all findings from the investigations so they can relay this back to the complainants where necessary.
- 7.1.6 Should a complaint be made direct to the site then site management shall carry out a detailed odour assessment as detailed above.
- 7.1.7 The Council will ensure that the complainant has all the relevant contact details of the site (i.e., the Site Manager) and the officer responsible at the Environment Agency. The Council will be in regular contact with the complainant and the Agency whilst the cause of the odour is being investigated and remediated.
- 7.1.8 An evaluation of the effectiveness of the techniques used will be carried out on completion of any remedial measures or if the complaints persist. Records of the above will be retained by site for future reference.

### 7.2 Non-Conformances and Complaints

- 7.2.1 Each complaint will be reviewed and assessed. If the site is identified as the source of the potential odour nuisance then an assessment shall be carried out in order to determine the source of the complaint and then the cause of the odour.

- 7.2.2 If an odour can be directly related to the site, corrective actions will be identified and programmed for remediation. Actions taken in response to any odour complaint will be recorded on the odour investigation form.

### **7.3 Odour Complaints and Management Review**

- 7.3.1 All complaints will be investigated immediately by the site management including but not limited to a review of the number of complaints, weather conditions, investigations and remediation works. If required, the Site Management Plan and OMP shall be updated to reflect any changes made to the management procedures on site following the review.
- 7.3.2 Site management will review all procedures for the facility against as industry practice, guidance, and legislation to ensure continued best practice is carried out at the facility. Any amendments to practices on site will be reflected in updates of the Site Management Plan and OMP.

### **7.4 Community Engagement**

- 7.4.1 Should odours be identified from external sources which are thought may have been related to complaints received or likely to cause complaints then the site would consider contacting those responsible for the odour if possible, to establish communication in relation to those activities.
- 7.4.2 Should extensive work be required on site which may lead to potential odour complaint then the site may consider providing advance warning to residents, dependent upon the likely duration and estimated impact of such works. The Environment Agency would be contacted prior to issuing any such notice.
- 7.4.3 Due to the absence of odour complaints to the facility it is not thought that ongoing community engagement is required however this would be reviewed in light of any complaint received at the facility.

### **7.5 Means of Contact**

- 7.5.1 The site will be readily contactable to outside organisations and to members of the public. The site signage board (placed in a readily visible location) contains the necessary contact details for both the site operations and Environment Agency.

### **7.6 Contingency and Emergency Plans**

- 7.6.1 In the event that odour is proven to be from the site and found to be causing a problem, as determined by the investigation of off-site complaints or during routine on-site monitoring, action will be taken to determine the source

## Drawings

Proposed Site Layout – BDY-03

Permit Boundary Plan - WDB/B033235/PER/01

Environmental Receptor Plan - WDB/B033235/REC/01

# Appendices

## Appendix A – Daily Odour Inspection Form

Haye Down Waste Transfer Station

Odour Management Plan

<b>Date</b>	
<b>Name</b>	
<b>Observations</b>	
<b>Actions</b>	
<b>Signature</b>	

## Appendix B – Odour Complaint Investigation Form

Dust complaint report form	Date:	Ref. No.
Name and address of complainant		
Tel no. of complainant		
Time and date of complaint		
Date, time and duration of offending dust		
Weather conditions (e.g., dry, rain, fog, snow)		
Wind strength and direction (e.g. light, steady, strong, gusting)		
Complainant's description of dust		
Has complainant any other comments about the offending dust?		
Any other previous known complaints relating to installation (all aspects, not just dust)		
Any other relevant information		
Potential dust sources that could give rise to the complaint		
Operating conditions at the time offending dust occurred		
Action taken:		
Final outcome:		
Form completed by	Signed	