

Odour Management Plan

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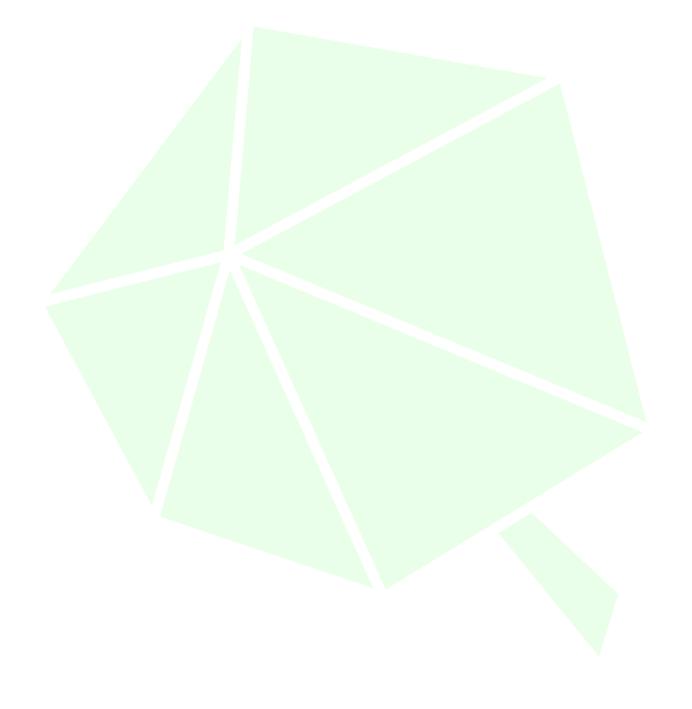
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D1	07/03/2023	AIL	AIL	Drafted for application EPR/JB3408LY/A001, to be reviewed by client.
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Odour Management Plan

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Who this plan is for

This plan is for the Technically Competent Managers, Site staff, contractors and the Environment Agency (EA).

A copy of this plan will be kept on site and accessible for site staff, contractors or the EA to review.

Site staff will be trained in sections of this Odour Management Plan (OMP) that are applicable to their roles via tool box talks (TBTs).

1 INTRODUCTION

This Odour Management Plan (OMP) relates to Environmental Solutions Waste Management site 241 Engineers Road Greenham Business Park Newbury Berkshire RG19 6HN. The permit being applied for is based on the Standard rules SR2015 No15, Waste electrical and electronic equipment authorised treatment facility (ATF) excluding ozone-depleting substances. However, with the additional waste codes being added the site will reflect more of a waste transfer station. The addition of these extra waste codes enables Environmental Solutions Waste Management to provide a complete waste service for the commercial sector.

The purpose of the site is to reduce disposal of waste and encourage re-use, refurbishment or recycling of Waste Electrical and Electronics Equipment (WEEE) and other waste arising from business clearances.

The permit does not allow the treatment of WEEE containing ozone-depleting substances but this waste can be accepted for storage only. The treatment and storage of WEEE meets the technical requirements of the WEEE Directive (2012/19/EU). Treatment of WEEE is carried out using Best Available Treatment (BAT), Recovery and Recycling Techniques (BATRRT).

This OMP covers diffuse emissions from the permit activities, there is no point source emissions. WEEE treatment must be carried out inside a building. There must be no point source emissions to air outside the building. Treatment includes, dismantling, separation, shredding, screening, grading, baling, shearing, compacting, crushing, granulation, repair or refurbishment, or cutting of waste into different components for recovery.

The permitted activities are not carried out within 200 m of a European Site, Ramsar site or a Site of Special Scientific Interest (SSSI). The activities are not carried out within 50 m of any well spring or borehole used for the supply of water for human consumption. This must include private water supplies. These rules will also not permit the burning of any wastes, either in the open, inside buildings or in any form of incinerator.

The location of the site is shown on drawing 004.1_09_005. The permitted boundary is shown in 004.1_09_001. The ground floor and 1st floor layout plans 004.1_09_006 and 004.1_09_007 show how the key areas are laid out for storage and processing. The overall site is shown in 004.1_09_00.

1.1 Site description

The site is located at 241 Engineers Road Greenham Business Park Newbury Berkshire RG19 6HN, the grid reference for the site is SU 50102 64290 (eastings: 450102, northing 164290).

The site lies to the south east of Newbury and is located within an industrial area that historically has been an air base. The site can be accessed by the A339.

The site is approx. 0.174 ha and operates from Monday to Friday from 08:00 until 17:00. Waste is delivered by Environmental Solutions Waste Management Ltd own fleet or third parties that have worked with the operator for a long time and is pre booked into site prior to arrival. For waste deliveries the site is accessed via its northern boundary as shown on site plan 004.1_09_00. Once the waste vehicle has arrived on site it will be directed to the

correct location to deposit their waste. All waste received to the permitted facility are subject to the waste acceptance procedures prior to being unloaded see 004.1_05_007 Environment Management System (EMS). During this stage if any non-conforming wastes are identified they are rejected, where not possible they will be stored in an appropriate manner and removed from site to an appropriately authorised facility as soon as practicably possible.

Figure 1 Site Location



1.2 Maintenance and review of the OMP

Responsibility for odour sits with the TCM. They are trained via their competency qualification to fulfil this role as well as reviewing this OMP and providing tool box talks to other recycling operatives on site.

- The OMP is stored on site as hard copy and electronically
- The OMP is reviewed at least annually, after a major incident or following a significant process change.
- Training is provided to recycling operatives in relation to the OMP waste acceptance, waste rejection, treatment activities and complaints response.

All new starters if relevant are trained in the OMP by the TCM, once the OMP is reviewed if further training
is required it is provided and recorded in a training matrix.

1.3 Relevant sector guidance on which this OMP is based

- Develop a management system: environmental permits.1
- Control and monitor emissions for your environmental permit²

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¹ https://www.gov.uk/guidance/develop-a-management-system-environmental-permits

² https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit

2 RECEPTORS

These sensitive receptors are shown on Drawing 5 Sensitive Receptors 1 km Plan 004.1_09_005

Table 1 Receptor List

TYPE OF RECEPTOR	#QI	DESCRIPTION	DISTANCE FROM BOUNDARY (M) APPROX	DIRECTION	Sensitivity to odour Low (e.g. footpath/road) Medium (e.g. industrial / commercial workplace) High (e.g. housing / pub / hotel etc.)
		SITE			
		Site Workers	On site	-	Н
⊢		Site Visitors	On site	-	Н
ERT		COMMERCIAL			
PROPERTY	1	Greenham Business Park - Vehicle Storage to the North	0 m	N	Н
D PF	2	Greenham Business Park - Smaller Units to the South East	0 m	SE	Н
AN	3	Greenham Business Park - Larger Units to the West	86 m	WSW	M
HUMANS AND	4	Sewage Works off Ecchinswell Road	792 m	SSE	M
¥	5	Scrap Yard off Thornford Road	896 m	SE	L
		RESIDENTIAL			
	1	Residential Properties east of Greenham Business Park	431 m	ESE	L

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TYPE OF RECEPTOR	ID#	DESCRIPTION	DISTANCE FROM BOUNDARY (M) APPROX	DIRECTION	Sensitivity to odour Low (e.g. footpath/road) Medium (e.g. industrial / commercial workplace) High (e.g. housing / pub / hotel etc.)
	2	Residential Properties south of the A339	437 m	SSW	L
	3	Residential Properties within Bowdon Woods	673 m	NNE	L
		PUBLIC USE			
	1	Greenham Control Tower Museum	676 m	NNW	L
	-	Footpath adjacent to the River Enborne	792 m	SSE	L
	_	Footpath between Ecchinswell Road & Featherbed Lane	795 m	S	L
		ROADS & RAILWAYS			
	-	Apron Road	12 m	N	L
	-	Main Street	50 m	SW	L
	-	A339	378 m	S	L
		RECREATIONAL			
	1	Greenham Common	182 m	NNE	Н
	2	Newbury & Crockham Golf Club	917 m	NNW	L
		AGRICULTURAL			
	1	Packets of Arable Land between Bishops Green & North Sydmonton	773 m	S	L
	2	Packets of Arable Land between Ecchinswell Road & the A339	775 m	SW	L

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TYPE OF RECEPTOR	#QI	DESCRIPTION	DISTANCE FROM BOUNDARY (M) APPROX	DIRECTION	Sensitivity to odour Low (e.g. footpath/road) Medium (e.g. industrial / commercial workplace) High (e.g. housing / pub / hotel etc.)
		ATMOSPHERE			
	-	Not located within an AQMA	-	-	L
		SURFACE WATER	1		
	-	River Enborne	816 m	SW	L
WATER	-	Ponds at Greenham Common	824 m	NNW	L
M W		GROUNDWATER			
	-	Bedrock- Secondary A	On site	-	L
	-	Superficial Drift- Secondary A	On site	-	L
		DESIGNATED SITES (European)			
	1	SSSI - Greenham & Cookham Commons - Former Runway Area	178 m	N	M
ENVIRONMENTALLY SENSITIVE	2	SSSI - Greenham & Cookham Commons - Area West of Greenham Business Park	299 m	W	Н
SE	3	Ancient Woodland - Peckmoor Copse	407 m	WSW	L
EN	4	SSSI - Greenham & Cookham Commons - Area East of Greenham Business Park	607 m	ESE	L
	5	SSSI - Bowdon & Chamberhouse Woods	941 m	NNE	L

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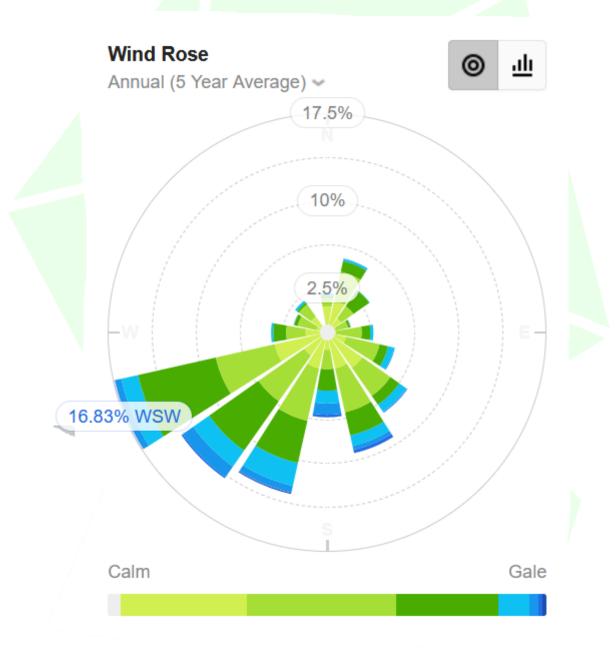
TYPE OF RECEPTOR	# QI	DESCRIPTION	DISTANCE FROM BOUNDARY (M) APPROX	DIRECTION	Sensitivity to odour Low (e.g. footpath/road) Medium (e.g. industrial / commercial workplace) High (e.g. housing / pub / hotel etc.)	
	6	Ancient Woodland - Great Wood & Cakeball Copse	945 m	NE	L	
		NON-DESIGNATED SITES				
	1	1 BAP - Lowland Heathland throughout Greenham & Cookham Commons		N	Н	
	2	BAP - Deciduous Woodland surrounding Greenham & Coookham Commons 288 m		ESE	M	
	3	BAP - Coastal & Floodplain Grazing Marshes adjacent to the River Enborne	SW	L		
HERITA GE LOATIO		LISTED BUILDINGS AND PARKS				
HE O	1	Grade II Listed - RAF Greenham Wing Headquarter & Combat Support Offices	601 m	WNW	Ĺ	

These sensitive receptors are shown on Drawing 5 Sensitive Receptors 1 km Plan 004.1_09_005

2.1 Wind Rose and Source of Weather Data

Sensitive receptors have been identified up to 1 km and are shown on the sensitive receptors plan Drawing 5 Sensitive Receptors 1 km Plan 004.1_09_005. A full list of receptors is also shown in the sensitive receptors table in Table 1 Receptor List. The sensitive receptors shown are in all directions of the site. The closest observing station where weather data is available is Heads Hill approximately 2 km to the east of the site (based on observations between 2017 – present). Figure 1 below shows the wind rose for Heads Hill which indicates the prevailing wind is WSW.

Figure 2 Wind Rose



(www.willyweather.co.uk/)

3 SOURCES OF ODOUR AND SITE PROCESSES

3.1 Incoming Waste

Waste to be accepted to site must conform with **Error! Reference source not found.** in 004.1_05_007 EMS. If it is not on this list then it is rejected. Waste arrives on site delivered by Environmental Solutions Waste Management Ltd own fleet or third parties that have worked with the operator for a long time and is pre-booked into site prior to arrival. And is accepted in accordance with the waste acceptance procedure in 004.1_05_007 EMS.

If any waste is identified as non-conforming then firstly the site manager shall be informed. The waste must be identified and the decision made whether it can be handled on site; if it can (i.e. listed in table of wastes) then it shall be deposited in the correct container else-where on site. If waste cannot be identified or is suspected as or non conforming the waste shall by isolated in an container and removed from site to an appropriately authorised site.

The site supervisor will get advice on how best to deal with the material and manage it accordingly. All non-conforming wastes will be kept separate on site from other wastes and moved (providing it is safe to do so) to a designated quarantine area. All non-conforming wastes will be removed from site within 7 working days, or as soon as reasonably practicable using specialist contractors. All instances of non-conforming waste will be recorded in accordance with 004.1_05_007 EMS. All instances of non-conforming waste will also be notified to the Operations Manager to allow for preventative actions to be put in place

3.2 Waste Unloading and Inspection

During unloading the site operative will visually check to ensure no 'non-compliant' waste is present.

3.3 Waste Storage

Under normal operational procedures storage limits and locations will be in accordance with the site layout plan Drawing 3 Site Layout Ground 004.1_09_006AND Drawing 4 Site Layout 1st Floor 004.1_09_007. The largest waste pile made up of bales/contaniners on site will contain up to 36 m³. Other waste will be stored in containers.

- Waste unloaded will be segregated at the point of unload as follows;
- Wood Stacked into piles. Broken. non-treated wood shredded into Dolavs then tipped into 40 yard RoRo.
- Paper At point of collection this is decanted into wheeled bins. Taken into Warehouse 1, decanted into stillages then shredded and baled. Bales of paper are stored in the designated area in the yard.
- Cardboard Unloaded from collection vehicles either already baled or loose. Loose cardboard baled and stored with other bales of cardboard in the designated area.
- Polythene Unloaded from collection vehicles either already baled or loose. Loose polythene baled and stored with other bales of polythene in the designated area.
- Metal Waste metal is stored directly into 40 yard RoRo.

- WEEE Collected on either pallets or roller cages taken up to the mezzanine floor in Warehouse 2.
 Processed and either palletised and wrapped for shipping out or decanted into modified IBCs for onward shipping.
- Plastic Palletised, wrapped and stored in designated area ahead of onward shipping.

3.4 Storage Areas

Storage areas are shown on site layout plan Drawing 3 Site Layout Ground 004.1_09_006 Drawing 4 Site Layout 1st Floor 004.1_09_007 where waste is stored in loose piles there are fire resistant barriers rated to 120 mins where this is not achievable waste is stored in containers.

Each waste type has its own area for storage and is ruled by physical amount that can be stored prior to onward shipping. The normal amount before specific waste is collected would be between half to a full artic load. Storage is in accordance with Error! Reference source not found.

3.5 Waste Handling

Once waste is deposited as directed by on site staff it is stored either in a loose pile pre processing or in containers pre processing.

Waste is stored no longer than up to 3 weeks including pre processing time (storage).

Waste is either baled or palletised. Some waste treatments may require primary treatment;

Paper – Collected in wheeled bins, taken into warehouse 1 – decanted/sorted into metal stillages, shredded and baled.

Wood – Broken pallets/untreated wood is shredded into dolavs then decanted into 40 yard RoRo ahead of onward shipping.

Card – Baled and stored.

Polythene – Baled and stored.

Plastic – Palletised, wrapped for safe transit.

WEEE – Sorted and segregated. Some WEEE deemed as confidential would be shredded into tonne bags, palletised and secured for transit for correct disposal/recycle.

Any general waste leftover through our processing is decanted and stored in 40 yard RoRo ahead of transit to transfer station.

3.6 Odorous materials entering and leaving site

All material entering and leaving is via road in either sheeted or containerised vehicles. Vehicles deliver waste to site approx. XX times per day. All drivers are instructed that if carrying an odorous load to report to TCM or appropriately trained individual to ensure appropriate storage and time lines are adhere to, storage in an sealed lockable skip and to be remove was in 72 hours from site.

3.7 Odorous Materials

Table 2 Odorous Materials

Odorous and potentially odorous material (any solid, liquid or gas)	Lligh Dick /	quantity on site		Location of odorous materials on site	Additional comments
20 03 01 mixed municipal wastes	High	12	72 Hours	Containers as per Drawing 3 Site Layout Ground 004.1_09_006 Drawing 4 Site Layout 1st Floor 004.1_09_007	If know to be too odorous diverted to another facility.

3.8 Overview of Odorous Processes and Emissions

Odorous material that arrives on site will be identified firstly by the driver and then by the TCM or appropriately trained site operator.

This waste will not go through any other process other than being stored in a sealed lockable container. It will be removed within 72 hours. Location of sealed lockable container will be stored externally in the Skip Container 20, 35 and 40 yard RORO locations shown on Drawing 3 Site Layout Ground 004.1_09_006.

It will be stored in a sealed lockable container, staff made aware. If temperatures exceed 25°C then proactive odour monitoring will occur at the pre set odour monitoring points shown on Drawing 6 Monitoring Locations 004.1_09_009.

4 CONTROL MEASURES AND PROCESS MONITORING

Site will employ the monitoring techniques outlined below to ensure that control measures and operational procedures are followed and that good practices are being implemented:

- TCM daily checks.
- Weather conditions monitored daily and operations planned accordingly.
- Daily Olfactory Survey as detailed in Error! Reference source not found. will be carried out by the TCM or nominated deputy (observations recorded in the site diary)
- Site audits conducted by the company's regulatory department
- Site audits and inspections by the Environment Agency
- Site inspections by the planning authority.

4.1 Responsible Persons

All site personnel are responsible for immediately reporting odour problems to the TCM or his nominated deputy.

4.2 Meteorological Conditions

Weather data will be monitored using weather apps on mobile phones. Weather data will be recorded in the site diary.

4.3 Olfactory Monitoring

The first olfactory survey in accordance with **Error! Reference source not found.** will be carried out within 30 m inutes of opening the site on an operational day by the TCM or his nominated deputy. Inside and outside the site boundary will be surveyed and observations will be noted in the site diary.

During the working day further olfactory monitoring will take place. The odour assessor may not be subject to significant compost odour for at least 30 minutes prior to the assessment and shall be compliant with the requirements laid down in the olfactory survey procedure (detailed in **Error! Reference source not found.**). This is to ensure that monitors are not suffering from odour fatigue and will be sensitive to composting odours.

Surveys will be carried out in accordance with the monitoring protocol contained within the Environment Agency's H4 Guidance.

If odour is detected and is judged to be distinct (odour intensity rank 3) then the TCM or his nominated deputy and the Environment Agency will be notified immediately and the olfactory survey will continue (as in **Error! Reference s ource not found.**) to attempt to determine the scope and extent of the odour plume. This will be achieved by driving and/or walking around the local area until a reasonably likely source is identified.

Table 3 Monitoring frequencies

Parameter	Monitoring Technique	Frequency
Odour	Olfactory monitoring	Monitoring to take place at least once a day upwind and downwind. Increased frequency in response to complaints.
	Complaint monitoring	Continuous (24 hour) via telephone reporting system.

5 ODOUR REPORTING

The nominated person responsible for responding to complaints and implementing the complaint procedure is the TCM.

If complaints are received in relation to the activities covered by the Environmental Permit e.g. noise, dust etc., these will be discussed with the TCM and, where necessary, action taken to deal with immediate consequences.

In the event that a complaint is received either directly from a neighbouring resident or indirectly via a regulatory body. The name, address and contact details of the complainant will be sought.

- name;
- address;
- contact details;
- date(s) and time(s) to which the complaint relates; and
- nature of the complaint and any other details which may assist in the identification of the source, activity
 or circumstances which prompted the complaint.

The TCM will then investigate the complaint to determine the cause and implement any corrective and preventative actions.

Timescales will be determined for follow-up of the corrective actions and determination of their effectiveness.

The complaints information and subsequent investigation will be recorded in Environmental Solutions Waste Management Ltd Complaint Form (**Error! Reference source not found.**).

The timings and description of the complaint will be analysed in conjunction with the activities and meteorological conditions logged on site within 1 working day to identify the offending source or activity. The complainant may be asked to keep an ongoing log for correlation with the site operational log. Once the source or activity is identified suitable mitigation measures will be implemented without delay.

The complainant will be contacted to check that the mitigation has been effective.

5.1 Complaints reporting

If a complaint is substantiated by the operator it shall be reported to the Environment Agency via the incident hot line: 0800 80 70 60.

Site will provide direct contact details as shown below if reporter is happy to report incidents directly to site.

5.2 Community engagement

If issues occur they the local community groups such as parish council etc will be contacted and informed of the situation and what the operator is doing to rectify the issue.

5.3 Pro-active odour monitoring

Daily sniff testing will be carried out by the TCM if odour is noticed more formal sniff testing at monitoring points in Drawing 6 Monitoring Locations 004.1_09_009 in accordance with Appendix 1 Olfactory Survey.

5.4 Reactive odour monitoring

In response to complaints active monitoring will be carried out in accordance with **Error! Reference source not f ound.** at monitoring points shown in Drawing 6 Monitoring Locations 004.1_09_009 an Appendix 2 Complaints Report will be completed.

6 ABNORMAL EVENTS

The sites EMS 004.1_05_007 also has further accident and contingency measures.

Table 4 Abnormal Events

Potential Source of Odour	Material arriving on site at reception area.
Receptor	See Table 1 Receptor List
Likelihood	Moderate, due to waste acceptance
Control Measures	Managerial procedure Sealed waste collection containers if risk of odour
Actions if Odour detected	Where possible odorous material will not be acceptable.
Person Responsible	TCM.
Potential Source of Odour	Storage
Receptor	See Table 1 Receptor List
Likelihood	Moderate, due to distance from receptor also ground topography.
Control Measures	Weather checked on weather app Storage duration max 72 hours Stored in a sealed lockable container.
Actions if Odour detected	Stop actions on site if the wind is towards the receptor. Sniff testers to complete odour survey. Remove waste form site sooner.
Person Responsible	TCM
Potential Source of Odour	Breakdown of shredding and other site equipment
Receptor	See Table 1 Receptor List
Likelihood	Moderate due to distance from receptor also ground topography
Control Measures	Daily vehicle checks. Spare parts kept available on site. All main repairs and servicing carried out by the respective dealers of the equipment. No odorous waste is put through this process.
Actions if Odour detected	Where possible complete repairs on day of breakdown. Hire in replacement equipment if repair delayed.
Person Responsible	TCM
Potential Source of Odour	Moving material
Receptor	See Table 1 Receptor List
Likelihood	Moderate
Control Measures	Use of Weather app station to monitor conditions i.e. Still or warm conditions.
Actions if Odour detected	Stop activities if operator identifies odour release. TCM or appropriately trained individual to complete sniff testing at monitoring locations.
Person Responsible	TCM

7 RECORD KEEPING

As a minimum, the following records must be kept to ensure compliance with the requirements of the Environmental Permit:

- A copy of the permit
- Risk assessments
- Competence and training records
- Duty of Care documentation and Environment Agency waste returns
- Other legally required documents
- Operational procedures
- Compliance records
- •

Records must be retained for 6 years unless they relate to off-site environmental or health effects, or the condition of the land or groundwater when they shall be retained until permit surrender.

8 MANAGEMENT PLAN REVIEW

The OMP will be reviewed as a minimum at least annually or following any substantial change in site operations or complaint of dust, particulate matter emissions or at the request of the Environment Agency.

Other activities which may prompt review of the OMP are variations to the environmental permit, accident, complaint, breach or a change in the site setting or sensitive receptors.

Where the review requires changes, this will be documented and maintained with the site records, for example, waste storage volumes, types of waste, changes to abatement measures, new or altered equipment.

9 AVAILABILITY OMP

All site operational staff will be trained in the contents of the OMP to ensure compliance and consistent operation of waste activities.

A copy of the OMP will be made available at the site for reference purposes and is available on request to the Environment Agency and other interested parties.

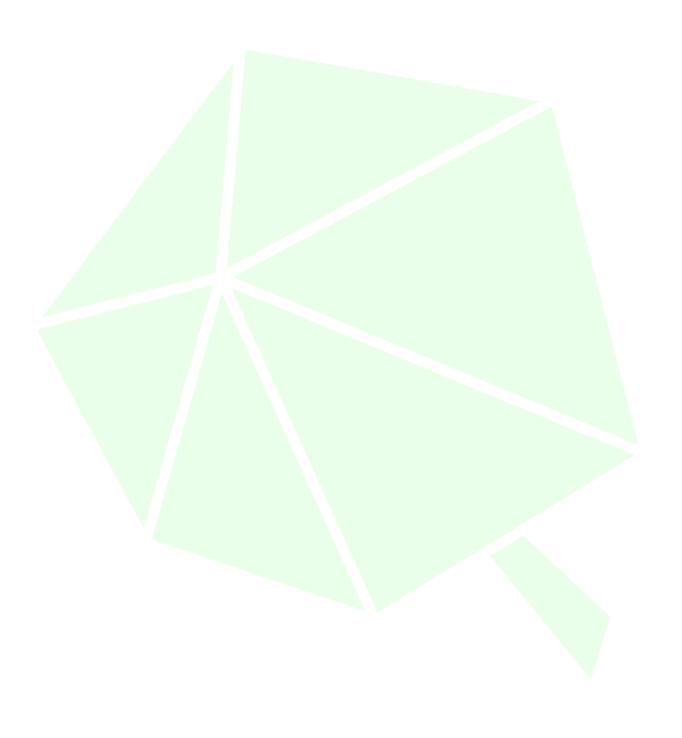
10 SUMMARY

The OMP seeks to ensure that by the adoption of industry best practice and appropriate measures, dust emissions are adequately controlled within the site and do not cause any significant impacts on amenity or the environment beyond the permit boundary.

This OMP describes how the operator is fully committed to operating responsibly and in compliance with the Environmental Permit.

The OMP will be reviewed annually and in the event of any complaint regarding dust emissions to ensure its provisions remain effective.

11 APPENDICES



Appendix 1 Olfactory Survey

Olfactory Survey

The first olfactory survey to be carried out within 30 minutes of opening the site on an operational day by the Technically Competent Manager or his nominated deputy. Results will be recorded in the site diary.

The record will include:

- Time of test
- Location
- Weather conditions (dry, rain, fog, snow, etc)
- Temperature (very warm, warm, mild, cold, or degrees if known)
- Wind strength (non, light, steady, strong, gusting) Use Beaufort scale if known
- Wind direction (e.g. from NE)
- Intensity rating³ as follows:
 - 0 no odour
 - 1 very faint odour
 - 2 faint odour
 - 3 distinct odour
 - 4 strong odour
 - 5 very strong odour
 - 6 extremely strong odour
- Duration of test
- Constant or intermittent in this period of persistence
- What does it smell like?
- Receptor sensitivity as follows:
 - Low (e.g. footpath, road)
 - Medium (e.g. industrial or commercial workplaces)
 - High (e.g. housing, pub/hotel, etc)
- Is the source evident?
- Comment, further action

³ Ref: German Standard VDI 3882, Part 14

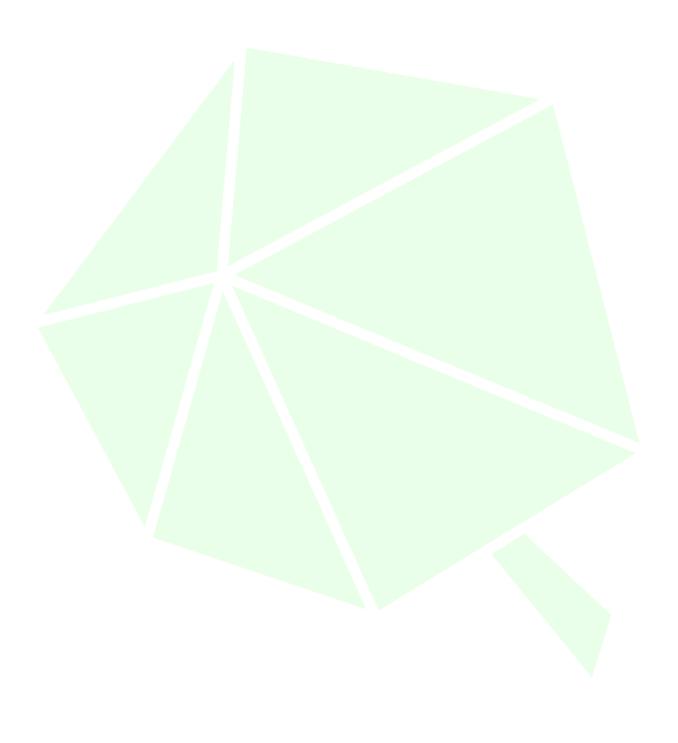
Appendix 2 Complaints Report

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

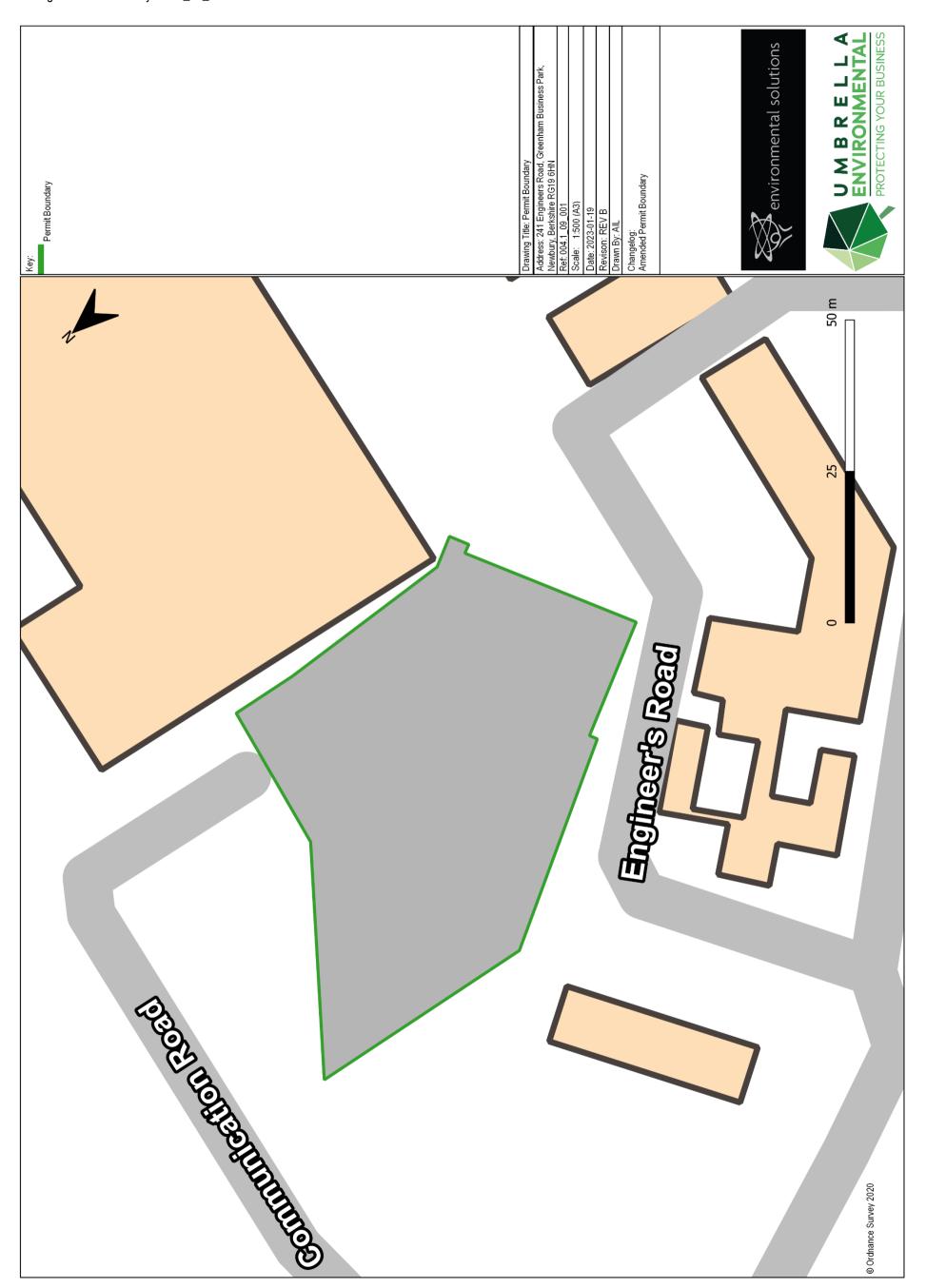
Sketch a plan of where the tests were taken, the potential source(s).

Intensity o No odour 1 Very faint odour	4 Strong odour5 Very strong odour6 Extremely strong odour	Receptor sensitivity Low (e.g footpath, road) Medium (e.g. industrial or commercial workplaces) High (e.g. housing, pub/hotel etc)
2 Faint odour		3 (3 (3), 1)
з Distinct odour		

12 DRAWINGS

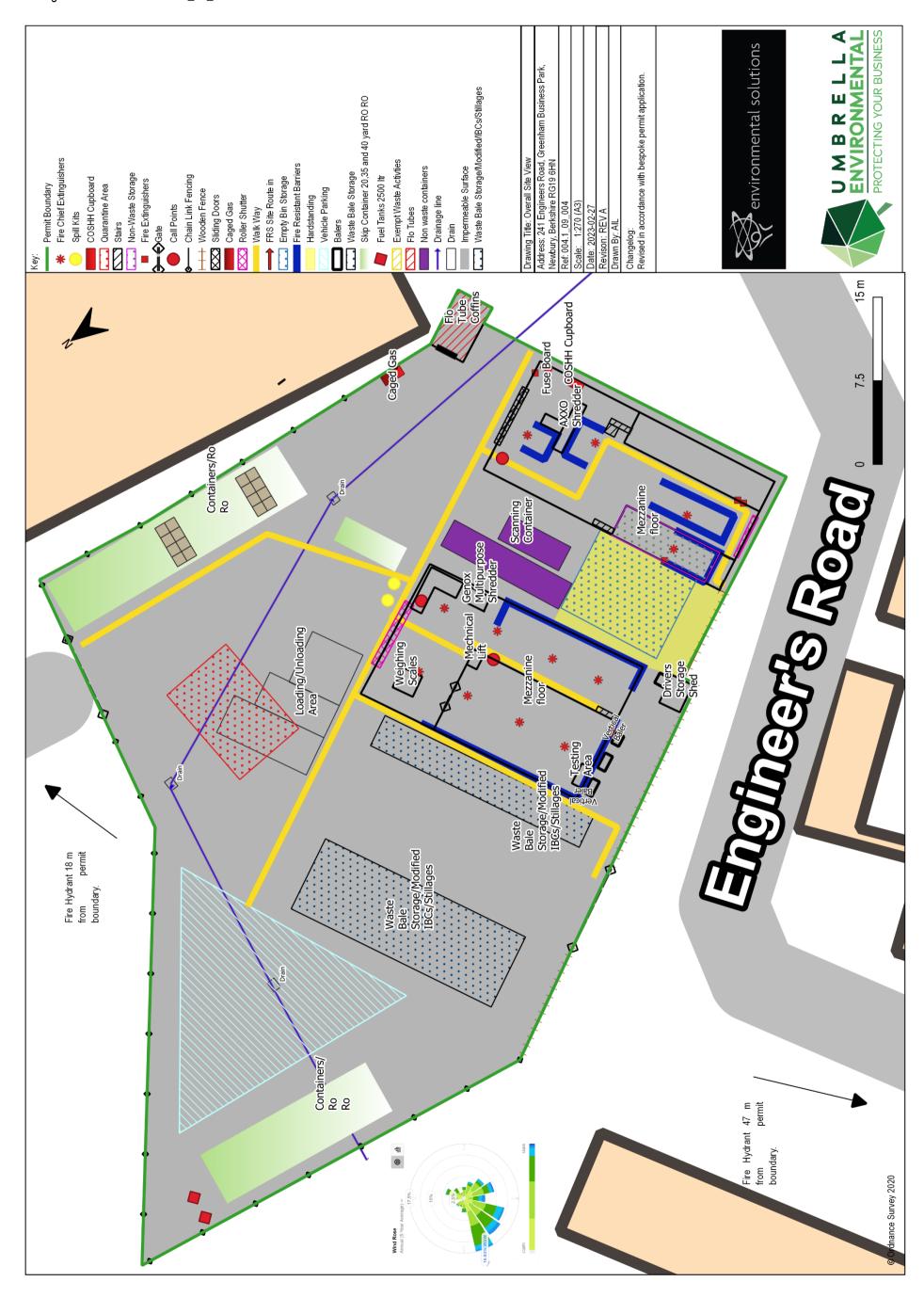


Drawing 1 Permit Boundary 004.1_09_001



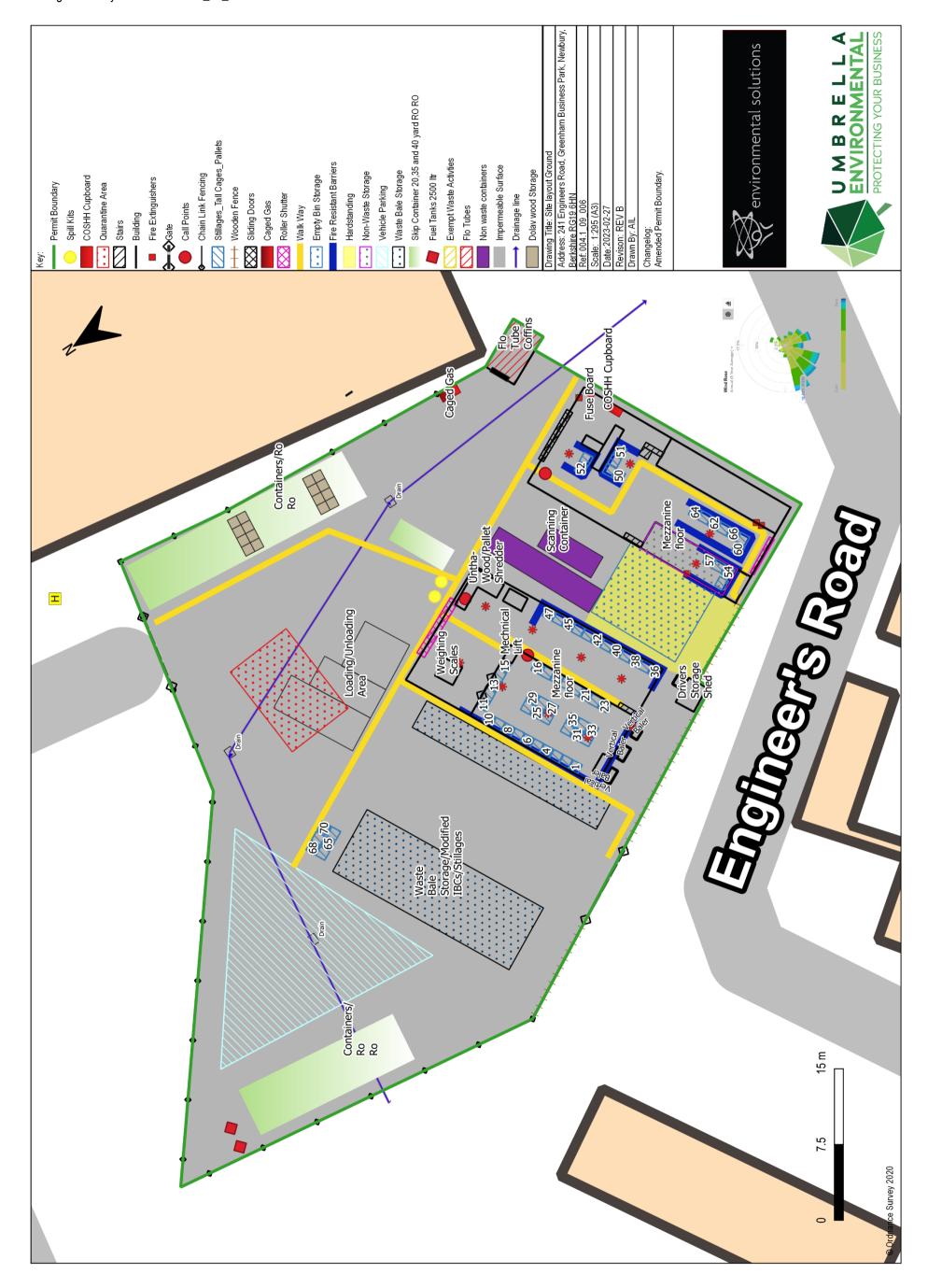
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Drawing 2 Overall Site View 004.1_09_004



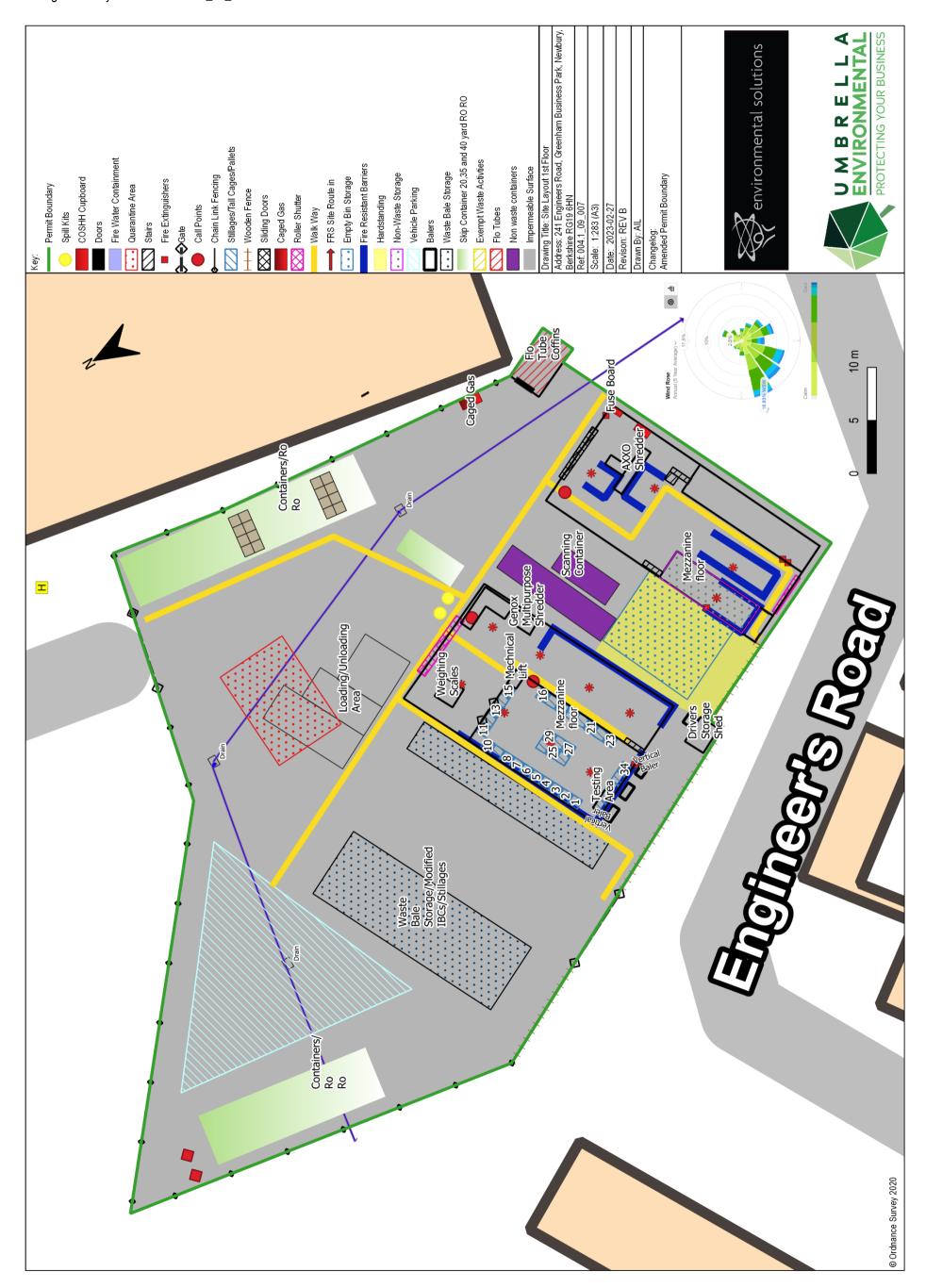
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Drawing 3 Site Layout Ground 004.1_09_006



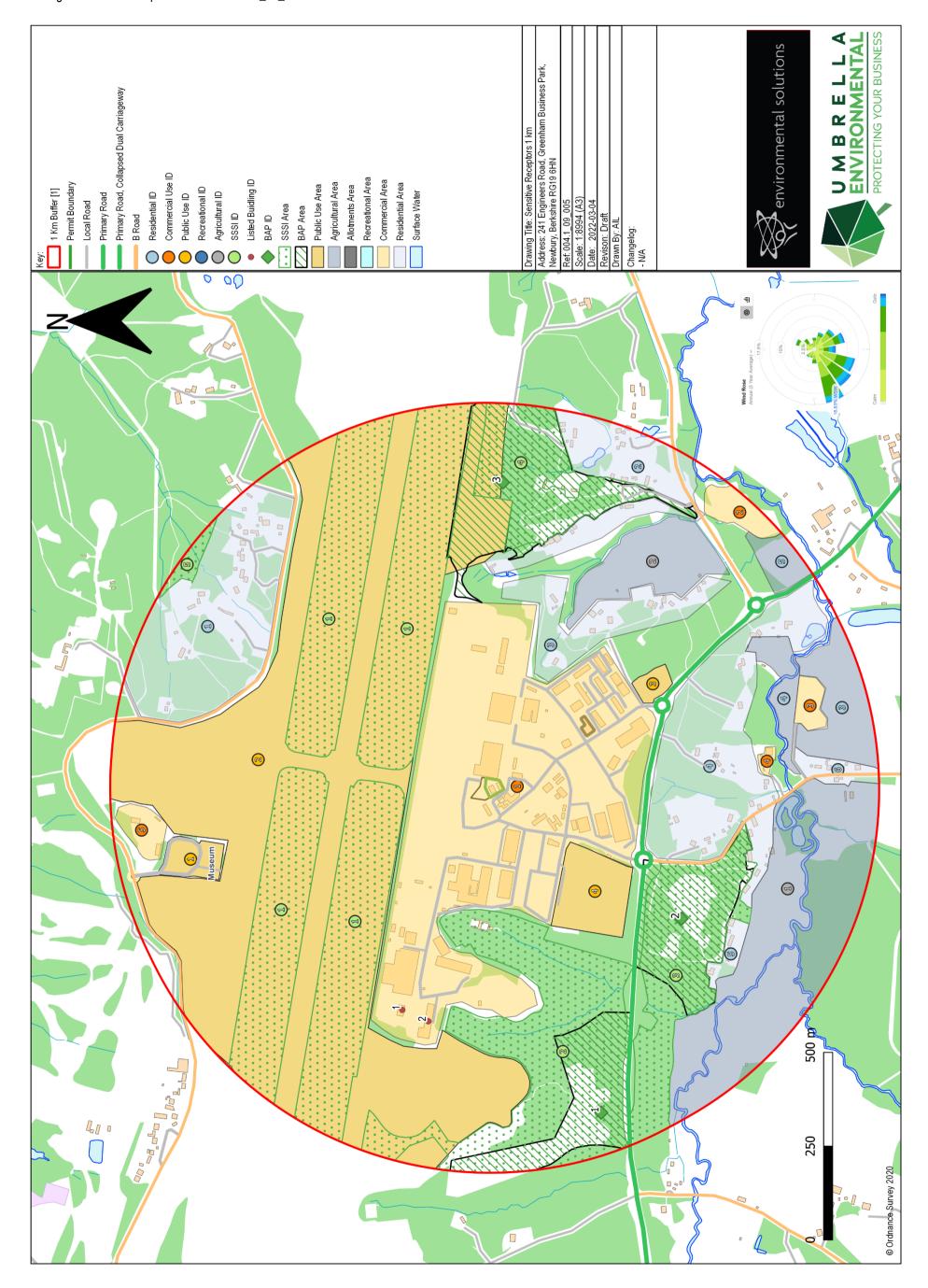
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Drawing 4 Site Layout 1st Floor 004.1_09_007



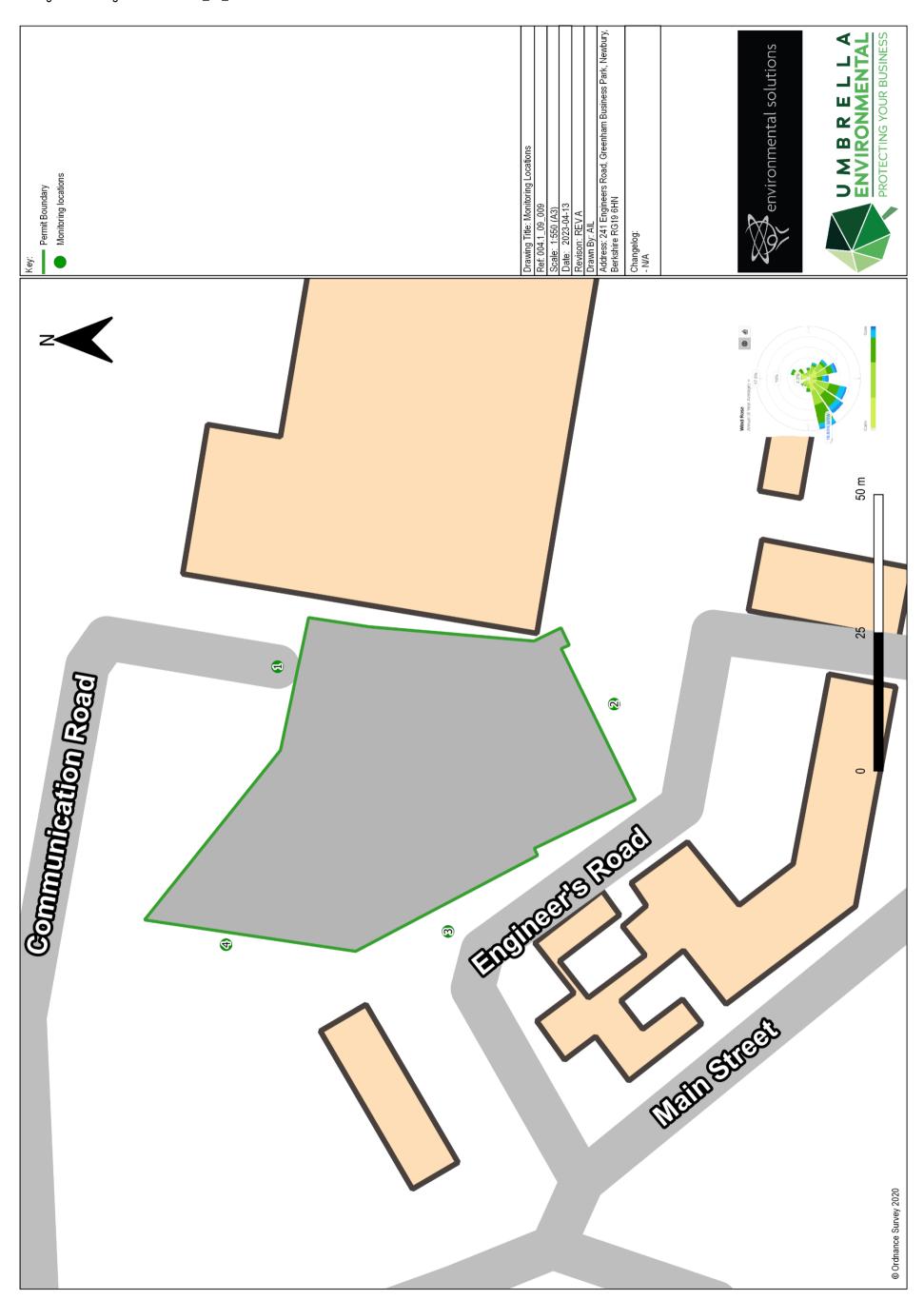
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Drawing 5 Sensitive Receptors 1 km Plan 004.1_09_005



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Drawing 6 Monitoring Locations 004.1_09_009



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