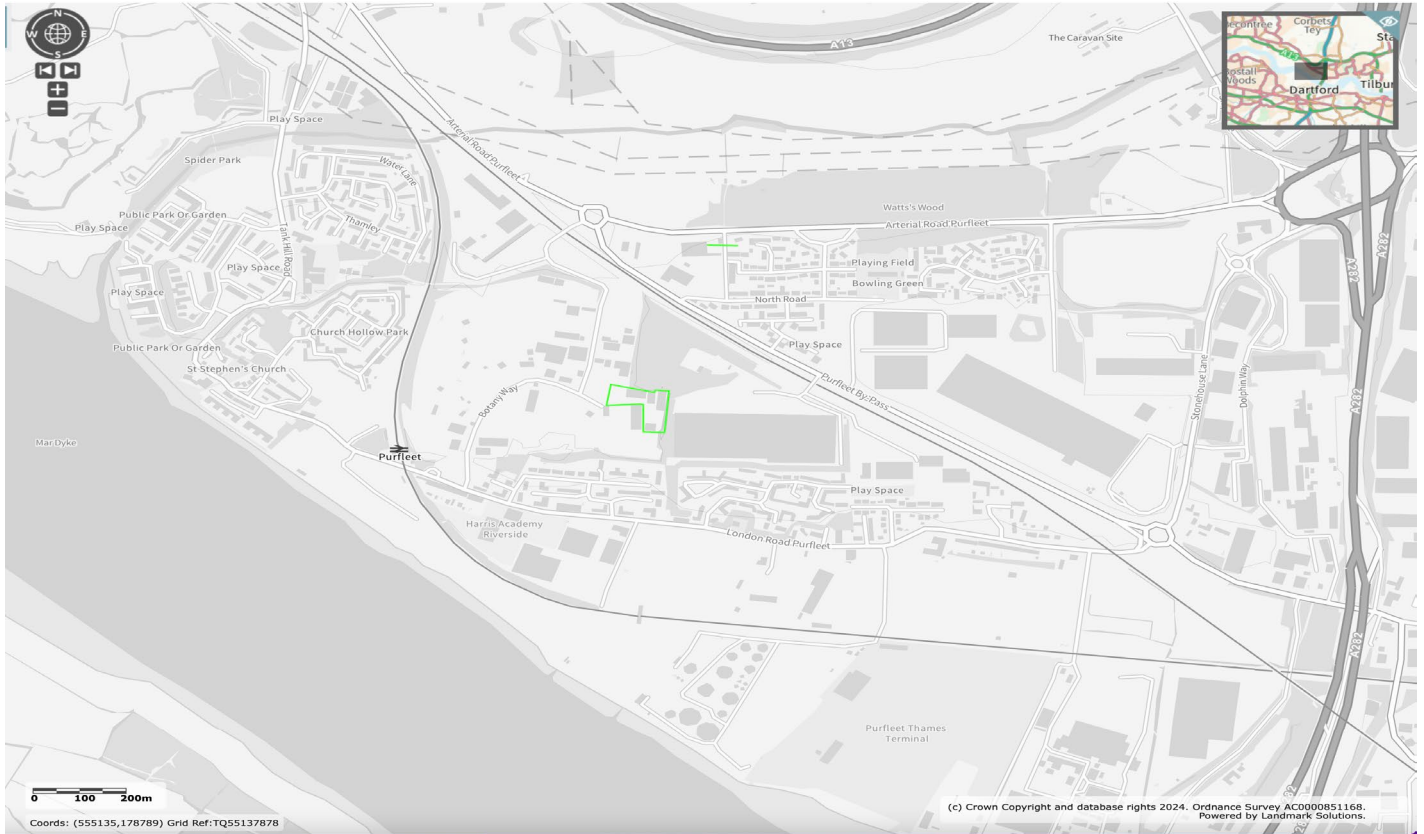




SHARP BROTHERS (SKIPS) LTD.



ODOUR MANAGEMENT PLAN

BOTANY WAY WASTE TRANSFER STATION
BEACON HILL INDUSTRIAL ESTATE
BOTANY WAY
PURFLEET
RM19 1SR

January 2025



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1 INTRODUCTION

1.1 General

- 1.1.1 Sharp Brothers (Skips) has applied for an environmental permit operate a household, commercial and industrial (HCI) waste transfer station with treatment.

It should be noted that the treatment aspect of the environmental permit is likely to relate solely to the removal of large items of metal prior to the wastes being transferred to the company's Rainham waste treatment facility where metal is required to be removed prior to the production of SRF and RDF outputs.

- 1.1.2 This Odour Management Plan (OMP) will allow Sharp Brothers (Skips) Ltd to implement an action plan should the site operatives detect an odour presence, receive complaints from local business and should the EA suspect odour emissions from the site during an inspection.

1.2 Site Location

- 1.2.1 The site is located within Beacon Hill Industrial Estate, on Botany Way, Purfleet, RM19 1SR.

1.3 Site Management

- 1.3.1 The site has an assigned Technically Competent Managers (TCM), site manager and site foreman (site management) who will be responsible for the general management of the site including the acceptance and handling of any potentially odorous wastes.
- 1.3.2 The operator will ensure that site management delegate site documentation (which includes this OMP) in addition to all relevant company procedures to operational staff to ensure they are familiar with the requirements and conditions of the site and documents.

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 maximum amount of waste to be stored in the enclosed building at any one time will be:
- Waste to be processed at 250m³ at any time
 - Processed materials stored in containers inside the enclosed building at 10 number containers at 30m³ each
 - Inert waste excluded from this plan
- 1.4.3 If the maximum storage capacity of the site is reached, no further waste will be accepted until such time waste can be removed from the site and taken to the operator's existing permitted facility in Rainham, approx. 4 miles from this site or another a suitably permitted facility.
- 1.4.4 The table below details a summary of the main waste types which will be accepted and stored at the site, the rows highlighted in red are those which will have the potential to cause odour:



Table 1.1 - Summary of Waste Storage Times / Quantities

Plan Ref	Description / EWC Code	Storage form	Volume (m3)	Max Duration of storage
PILE 1	Mixed C&D&E & MM waste 17 09 04, 20 03 01	Stacked in a freestanding pile inside 2-sided fire wall bay within the building	250	24-48 hours
CONTAINERS (up to 10 number)	Processed materials from Pile 1	Stored in steel containers of notionally 30m ³ capacity	300	24-48 hours

1.5 Site management

- 1.5.1 The site has an assigned Technically Competent Manager (TCM) who will be responsible for the general management of the site including the acceptance and handling of any potentially odorous wastes.
- 1.5.2 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 as 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:

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:

Sensitivity of Receptor	Criteria
Low	Industrial workplaces that also create emissions
Medium	Industrial workplaces
High	Clean Industrial workplaces (i.e. food business)

2.4 **Sensitive Receptor Locations**

- 2.4.1 The receptors in proximity to the site are shown on MWM Receptors Plan. Whilst there is a sensitive receptor in the form of a SSSI to the east of the site there are no sensitive human receptors within 1km.



2.5 Risk Matrix

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

		Sensitivity		
		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 General waste - storage prior to processing

- 3.1.1 General mixed waste areas are the waste reception/tipping area marked as Pile 1, the holding area for pre-processed mixed waste marked as Pile 2.
- 3.1.2 Whilst these wastes are not commonly associated with odorous emissions, they do 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 General waste

- 3.2.1 As detailed in Section 1.1.1 of this OMP, this [a mix of C&D, C&I] wastes is likely to be the predominant source of waste accepted and stored at the site. The storage areas for this waste are shown on Drawing No. SSL/SLP. The waste will be tipped in an enclosed building for processing into materials for reuse/recovery/recycling. These materials will be stored in containers and despatched from site on a daily basis to local off-takers.
- 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 in the enclosed building at which point the potential release of odour will be contained in the building.

3.3 Foul surface water

- 3.3.1. There will be no deposit or treatment of waste externally.
All areas which store and treat waste are located inside the enclosed building on an impermeable concrete surface. The building does not have positive drainage and it will contain any water desposited which will be cleared by manual and mechanical sweeping of the inside of the enclosed building. The above is shown on Drawing No. SSL Annex G from the Fire Prevention Plan drainage drawing.
- 3.3.2 In the event of an escape of liquid from the enclosed building the external area of the site drains to an interceptor.

3.4 Green wastes

- 3.4.1 Separated green wastes also have the potential to give rise to odorous emissions. The site is not a dedicated green waste handling facility – any green wastes arriving at site comprises almost entirely of branches (with/without leaves) and larger woody items from skips of other mixed wastes.
This means that the potential for odour is significantly less than that of a dedicated green waste handling facility which accepts green waste consignments consisting of branches, tree trunks, leaves, tree clippings and grass cuttings as these wastes have the greatest potential for odour due to their susceptibility to aerobic composting and decomposition whilst in storage, where branches and tree trunks are not susceptible.

3.5 Plasterboard/gypsum

- 3.5.1 Gypsum, in certain conditions, particularly landfill where anaerobic leachate can react with gypsum to produce an odorous/toxic gas, hydrogen sulphide. Also under the waste hierarchy it is incumbent on producers/holders



of controlled waste to recycle, the reaction of water with plasterboard will impact the recovery of the waste. The site will accept and store gypsum in a container within the enclosed building as a discrete waste stream.

3.6 **Processing of waste**

- 3.6.1 The site will process waste deposited in the enclosed building. A waste processing system is being installed which will enable, through mechanical and manual sorting, the separation of materials for reuse/recover/recycling by off-site off-takers. This will include SRF and RDF for generation of energy, wood for generation of energy, metal, plastic, paper and card and similar to form feedstock for new products.

3.7 **Background Odour Sources in the Area**

- 3.7.1 The primary off-site source of odour would be associated with other waste management facilities and aggregate/tarmac production.
- 3.7.2 Odour release could also be the result of abnormal weather conditions, machinery breakdowns and human error.
- 3.7.3 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 2.
- 3.7.4 Other odour potentially emitting operators are tabulated below in the Table below.

Company	Address	Type of Business	Distance from Manns site boundary (m)
Tank Clean	Botany Way	Waste tanker cleaning of bodies/drums	175m west
Killoughery	Botany Way	Waste Transfer Station	75 West
Esso fuel storage depot	London Road	Petro-chem facility	500m south
Foods; vanilla mart	Botany Way	Food production	200m north west
Foods; adavos	Botany Way	Food production	200m north west



4 ODOUR CONTROL

4.1 Site Operations

- 4.1.1 Limiting odour from the waste recycling facility can best be achieved through employing effective site management and good general practice. It is much easier minimising odours in the first instance than dealing with problems once they occur.

The operator confirms, in 3.6 above, that its operations will be carried out inside an enclosed building thereby negating as far as practicable the emission of odours.

4.2 Receiving Wastes

- 4.2.1 All wastes will be discharged inside the enclosed building.

Rigorous control of wastes delivered to the site is required, with contaminated or odorous wastes rejected in line with the procedures outlined in the EMS and the EP. Trained competent staff are in place to recognise odorous material and to inspect incoming wastes as it is deposited at the site. The site manager/TCM will decide on the most appropriate way to manage any malodorous waste such as being returned to the producer or sent to another authorised facility for treatment.

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.

- 4.2.2 Sharp Brothers (Skips) Ltd hire out skips to customers for a maximum of 2 weeks meaning that the waste received is unlikely to generate significant odorous emissions unless upon tipping inside the enclosed building; substantial odorous material is found and then actions shown in sections 6.1 and 6.2 will be followed. Incoming waste is stored for no longer than 48 hours prior to processing and stored waste is contained to reduce the impact of odorous emissions.
- 4.2.3 If the site reaches capacity and/or operational difficulties occur, the site will cease to accept waste and incoming wastes will be diverted to another authorised treatment facility.
- 4.2.4 Incoming mixed waste will be processed as soon as practicably possible to ensure that any other malodorous (or potentially malodorous) wastes contained within the incoming mixed waste which were not identified during deposit can be identified, isolated and rejected without delay.

4.3 Storage of Wastes

- 4.3.1 Low storage volumes and strict turnaround of potentially odorous wastes on site in accordance with the Environmental Management System will be observed. Stock rotation procedures will be observed with daily transfer from site to the operator's nearby waste treatment facility and to ensure the maximum duration of storage times are not exceeded these wastes do not exceed 48 hours.
- 4.3.2 The waste reception areas (Pile 1) as shown on site plan will be used for the tipping of mixed loads prior to loading into the treatment plant. The pile is primarily used a holding area so it is likely the waste will be stored here for no longer than 24 hours of being deposited inside the enclosed building. All wastes will be removed from site under the direct control of the operator's own transport fleet.
- 4.3.3 The remaining waste and materials which will be stored are considered to be of low risk in respect of odour emissions, nevertheless, storage times are suitably short to ensure the risk is further mitigated.



- 4.3.4 Waste will be stored to ensure compliance with the EP and as detailed within the EMS, FPP and this OMP document.

4.4 Loading and Transport of General Wastes

- 4.4.1 All loading of materials for despatch from site will be arranged as follows:
- All materials separated and sorted in the enclosed building will be stored in steel containers of notionally 30m³. These containers will be sheeted by the vehicle auto-sheeting system prior to departing the site.
 - In all cases the drop heights of loading any residual wastes will be kept to an absolute minimum.
- 4.4.2 All waste vehicles leaving the site containing light and/or potentially malodorous wastes will be securely sheeted or enclosed at all times.

4.5 Housekeeping

- 4.5.1 Regular cleaning of operational areas (i.e. minimum once daily) will be carried out to discourage odour generation from old degrading materials.

4.6 Liaison with Neighbours

- 4.6.1 In the extreme event of significant but temporary odour releases outside normal operations, neighbours will be contacted to advise them of the situation and the action being taken. The Environment Agency will also be notified.
- 4.6.2 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.
- 4.6.3 If any odour complaints are received, a Complaint Form will be completed (form in Appendix 2), 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 -48 hours and suitably reviewed by the site manager who is ultimately responsible.
- 4.6.4 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.

4.7 Training

- 4.7.1 As part of the operator's ISO14001 systems and procedures Management, Site Supervisor, Admin Staff and any sub-contractors/agency workers of Sharp Brothers (Skips) Ltd involved with potentially odorous materials and their handling will receive training in sniff testing and complaint handling.
- 4.7.2 Training will be given to all relevant persons to make sure they are competent in completing olfactory assessment survey forms, odour complaint report forms and the odour diary to ensure sufficient monitoring and reporting of odours can be carried out.



5 MONITORING

5.1 Monitoring Odorous Releases

5.1.1 Sharp Brothers (Skips) Ltd will use the following techniques to monitor odorous releases:

- a) Olfactory Monitoring
- b) Complaints Monitoring
- c) Odour Diaries (when necessary)

5.2 Olfactory Monitoring

- 5.2.1 Whilst all operations are carried out inside an enclosed building the site supervisor will monitor odour around the entire site during the day and will carry out odour monitoring at the perimeter of the site at once a day this will be recorded in the site diary. Should an issue be noticed an Odour Monitoring Form will be completed (Appendix I). 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.).
- 5.2.2 Out of hours monitoring will not be regularly required as incoming waste is stored for no longer than 24-48 hours prior to processing and stored waste is contained to reduce the impact of odorous emissions.
- 5.2.3 The results of monitoring exercises and any remedial action taken will be entered into the Site Diary 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 mounted anemometer and wind vane). Monitoring data sheets will also be completed daily.
- 5.2.4 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; removal offsite to a suitably licensed facility, faster processing/lower storage rates, removal of any standing surface water, re-siting of waste to a more suitable area of the site etc.
- 5.2.5 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.

5.3 Odour Monitoring Procedure

- 5.3.1 Sniff testing will be carried out by trained; competent staff weekly or as necessary (i.e. increased regularity should the management have reason to suspect odorous emissions from the site). Assessments will be carried out both routinely and in response to specific complaints.
- 5.3.2 The assessor should not:
- Smoke or consume strongly flavoured food or drink for at least 30 minutes before the assessment.
 - Consume confectionary or soft drinks immediately before the assessment.
 - Apply scented toiletries, such as perfumes or aftershave immediately before an assessment.
- 5.3.3 Monitoring points of routine assessments will be carried out alongside the dust monitoring, the monitoring points can be seen on Dust & Odour Monitoring Plan.

Complaint response will involve the routine assessment monitoring and further off-site monitoring. The off-site monitoring should be downwind of the site, progressing towards the site boundary and then away from the site in an upwind direction.

Unfortunately this is not possible from all monitoring points due to the location of the site. Directly to the north and east of the site is cliff faces from the original quarry extraction and entry cannot be gained, but it is possible to carry out simple sniff tests on Botany Way supported by periodic tests being carried out at



the top of the cliffs to satisfy the requirement for monitoring odours from site activities or indeed neighbouring activities.

5.4 Complaints Monitoring

- 5.4.1 All odour complaints will be investigated promptly and appropriate remedial action will be taken if the complaint is validated (as per sections 4.6.2-4.6.4) e.g. remove odorous materials off site as soon as reasonably possible. Complaints will be recorded on the form found in Appendix 2.
- 5.4.2 Complaints to the Local Authority or Environment Agency 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 Environment Agency's guidance on OMPs contingency plans have been prepared 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'.

It should be noted that the operator intends to clear the production of materials separated and sorted by the processes carried out inside the enclosed building at site on a daily basis for its materials off-takers.

- 6.1.2 If excessive odours 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: site operations; or, an off-site source (e.g. another waste management facility)
 - b) If on site:
 - Report incidence to the site or technically competent manager;
 - Identify the point of release of the odour;
 - Identify the cause of the release
 - Identify a solution;
 - Implement the solution;
 - Carry out olfactory tests to check the mitigation measures are working;
 - 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:

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.

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.

Process	Problem	Corrective Action
Waste Delivery (Tipping)	Deposit of odorous load	Isolate material. Reject material giving rise to odour.
Stored wastes (general)	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 licensed facility.

6.3 OMP Management

- 6.3.1 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 Environment Agency for approval before implementation.

It may also be revised upon request from EA, should the permit be varied, transferred etc.



Odour Monitoring Form			Sheet No	
Name: Telephone Number: 01708-555666		Address: Sharp Brothers (Skips) Limited Botany Way Waste Transfer Station Beacon Hill Industrial Estate Botany Way Purfleet RM19 1SR		
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 SW):				
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)



Sharp Brothers (Skips) Ltd Complaint Form

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	
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 a Complaints Form. 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.