

Odour Management Plan

Eastern Transfer Station

For Hertfordshire County Council



ODOUR MANAGEMENT PLAN

Quality Management			
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1 Introduction

Background

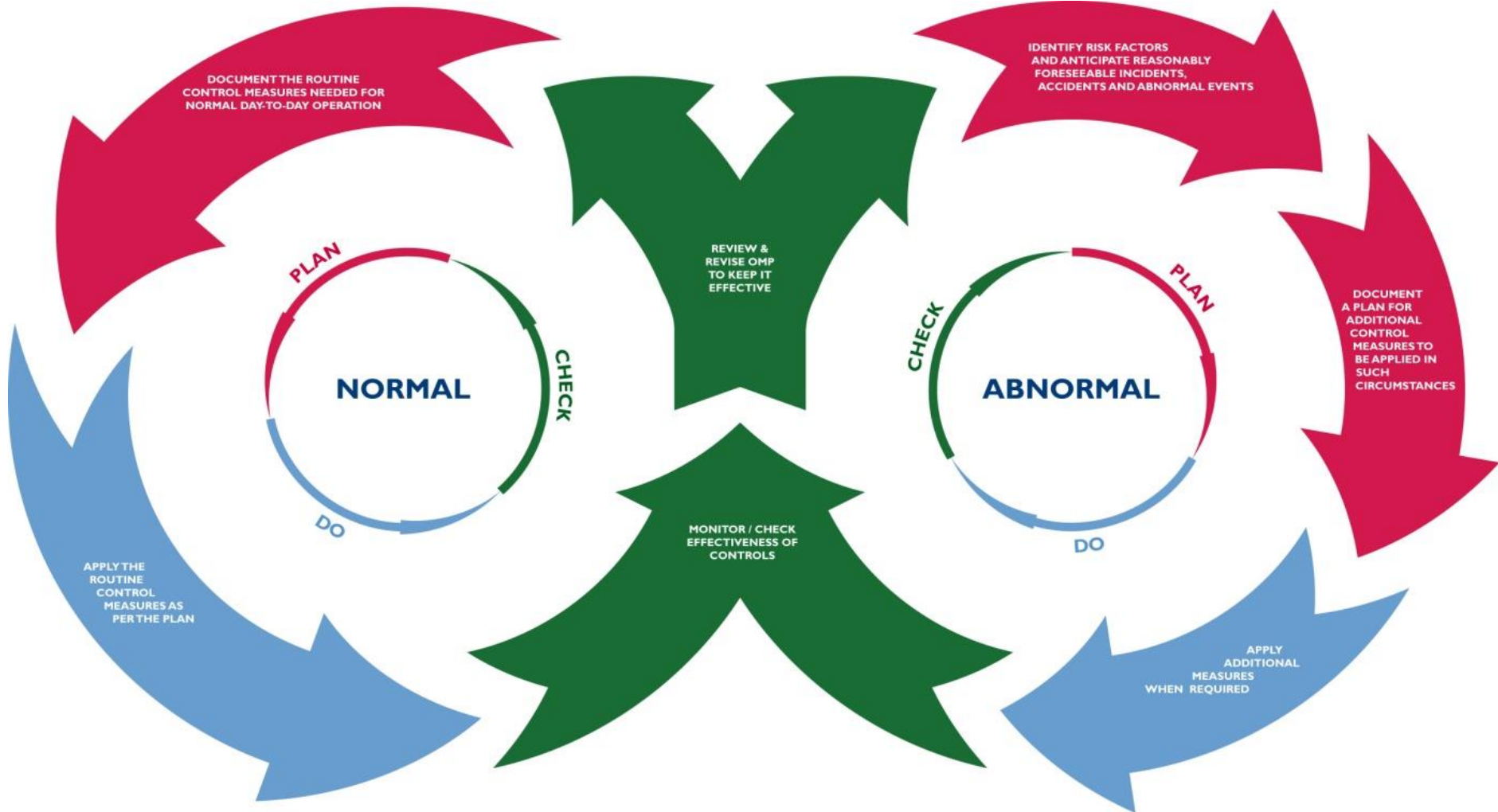
- 1.1 The Eastern Transfer Station (ETS) facility is located at Westmill Road, Hertfordshire, SG12 0ES. The recycling facility handles a maximum of 140,000 tonnes per annum of dry non-hazardous household, commercial and industrial waste. The facility will be regulated by the Environment Agency (the Agency) under an Environmental Permit.
- 1.2 RPS was commissioned by Hertfordshire County Council (HCC) to prepare an Odour Management Plan (OMP) for the Ware ETS.
- 1.3 The ETS will be a central hub at which a range of local wastes collected by waste management contractor(s) on behalf of HCC will be consolidated and transferred in bulk to other facilities for appropriate treatment or disposal.

Odour Management Plans – Purpose and Scope

- 1.4 An OMP is a live working document that formalises and describes how odour issues will be managed on the site. An OMP essentially forms part of the operational management system.
- 1.5 An OMP should show how odours are being managed and controlled so as to prevent or minimise the impacts. As well as covering normal operations, it should anticipate and plan for abnormal events and foreseeable accidents and incidents.
- 1.6 The control measures that can be applied will be different depending on whether the odour releases are from a point source or (as in this case) fugitive sources; but an OMP is relevant to both situations.
- 1.7 For sites where the dominant odour sources are fugitive or diffuse in nature, an OMP is crucial because:
 - there is limited ability to capture and abate them using engineering odour control technologies such as scrubbers and filters;
 - reliance is placed on using “good working practices” - these need to be written down, in a way that enables the document to be used as a practical working tool by the people doing the activities and the people responsible for the work. It is this formalised document that we term the OMP.
- 1.8 Additionally, OMPs complement engineering control measures (e.g. abatement systems) on sites with controlled point-source emissions, where there is a significant risk of any odour nuisance associated with plant failure and external factors outside the control of the operator (a quantitative approach to this type of odour incident being extremely difficult) [1].

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- 1.9 Therefore, OMPs have become a front-line tool for the effective control of odours at a wide range of sites, processes and facilities where there is potential for significant odour impacts.
- 1.10 An OMP is itself a control measure – a very important one – based on good management principles. It should follow basic management system principles:
1. **Plan** – identify releases (normal and abnormal conditions) and document the control measures for each
 2. **Do** – apply the control measures (routine and additional)
 3. **Check** – verify if the measures are working well enough, review and revise to keep effective
- 1.11 This is summarised in the flow diagram opposite. It can be seen that this closely follows the classic approach for an Environmental Management System (EMS); indeed, there is no reason why an OMP should not be fully integrated into an operator's EMS or Quality Management System (QMS).
- 1.12 It can also be seen that working to an OMP is an iterative process which, if followed properly, should be effectively self-regulating and should require little detail intervention from outside:
- it requires the operator to take the appropriate action to bring any problems under control or else (ultimately) suspend operations; and
 - if there is an odour problem, it should be picked up (through monitoring, complaints system) and the control processes reviewed and tightened to deliver the objective (no significant odour impact off-site).



Odour Management Plans – Permitting Requirements

- 1.13 If odour from an Environment Agency regulated process may cause odour pollution or annoyance beyond the site, then it is likely the Agency will require a written OMP. The current form of odour condition within Environmental Permits comprises of an odour boundary condition.
- 1.14 The Agency in its technical guidance note H4 Odour Management [1] provides advice on management of odour to comply with Environmental Permits and aspects that should be dealt with in an OMP.
- 1.15 This OMP provides information on the measures to be implemented to control odour emissions from the recycling facility. It is based on best-practice requirements in the various government and professional guidance documents on OMPs [2,3,4,5,6] and includes the Agency's requirements for OMPs as part of the permitting process, as described in Environment Agency H4 Odour Management guidance. All these guidance documents stress that the OMP should be risk-based, with the level of depth, complexity and sophistication of the OMP being dependent on the complexity of the processes and the potential impact of the odour on neighbouring premises: where a process may produce particularly offensive odours, then the OMP will necessarily be detailed and thorough; conversely, for a process with a lower potential odour impact, a simpler OMP will suffice.
- 1.16 To fully meet these requirements, this OMP includes the following:
- A process description, particularly describing odorous, or potentially odorous, activities or materials used;
 - Identification of all the release points for each of the activities and their locations;
 - Identification of the sensitive receptors within the area of influence that could be impacted;
 - A description of the routine mitigation/control measures that would be used day-to-day under normal operating conditions in the absence of any unusual risk factors;
 - Identification of possible risk factors (e.g. equipment/control failures, abnormal/unintentional situations, adverse weather conditions, spillages, etc.); and a listing of the consequences for odours of these risk factors;
 - A description of the additional measures that will be applied during these periods to deal with these risks and any reasonably foreseeable incidents and accidents;
 - A list of the actions in detail and who is responsible for carrying them out;
 - A description of what would trigger the further action/additional measures;
 - A description of the roles and responsibilities of personnel on site (e.g. organisational chart), and the training and competence of staff in odour-critical roles;

- Details of how the following will be carried out, and who has been assigned managerial and operational responsibilities for them: implementing and maintaining the OMP; responding to odour-related incidents; planned maintenance and repair and the keeping of essential odour-critical spares; regular review of the effectiveness of odour controls (including the OMP itself); engaging with neighbours and communicating with relevant interested parties; and keeping records of all activities and actions relating to odour and the OMP.

1.17 This OMP takes all of the above into account within the following structure:

- Section 2 – a description of the site and process;
- Section 3 – measures that are used to control odour during normal operations;
- Section 4 – routine maintenance and inspection;
- Section 5 – routine monitoring, recording and reporting;
- Section 6 – measures that will be used to control odour during maintenance and any abnormal events; and
- Section 7 – management measures taken to control odours.

2 Description of Site, Process description and Odour Sources

2.1 This section of the OMP contains:

- Site overview – a description of the site function and layout, neighbouring communities and sensitive receptors;
- Process description – a description of the plant, operations and controls; and
- Odour source inventory – a summary of the main sources of odour, their locations and the materials/activities involved, and the characteristics of the odour sources (e.g. fugitive or controlled, point, area or volume, release height, likely odorous compounds, quantities likely to be released, pattern of release, method of control).

Site Layout

2.2 The site is located within the administrative area of East Hertfordshire District Council (EHDC) and HCC.

2.3 The Ware ETS site is located on a former landfill site approximately 1.9 km north west of Ware, Hertfordshire (national grid reference: 534182E, 215988N). The site is located approximately 3.8 km north east of Hertford and approximately 12.1 km south east of Stevenage. A site location plan is provided as Figure 1. The main area of the site, excluding the existing access road from the public highway, is approximately 1.4 ha in size.

2.4 The proposed development lies immediately to the east of the newly operational Ware Recycling Centre (RC), approximately 0.8 km north of the A10 dual carriageway which delimits the outskirts of Ware.

2.5 Key components of the ETS facility are labelled in Figure 2, including different waste locations and the entrance road.

Neighbouring Communities, Other Odour Sources and Sensitive Receptors

2.6 The site has commercial and light industrial premises to the north and west of the site. The nearest residential receptors are located approximately 170 m to the west of the site. The area to the south is largely agricultural with the town of Ware beyond. To the west is the now operational Ware RC. Beyond this is the A602 Westmill Road, across which is the Westmill Farm site which has several commercial units, a golf course, a go-karting track, a caravan/camping site and several fishing lakes.

- 2.7 The Agency provides guidance [7] on where more detailed consideration of odour impacts from certain waste treatment facilities would be required, based on the distance from the facility. There is no guidance for this specific type of facility, but for composting facilities the guidance states that more detailed consideration of odour impacts would be required where there are sensitive receptors within 250 m of the facility. Additionally, the Agency has applied a distance function (set at 250 m) as a cut-off for composting sites seeking to obtain permits using Standard Rules. This distance is applied irrespective of the throughput of the compost plant. That guidance may be primarily concerned with bioaerosols but is good practice from the point of view of odour impact control, too. Defra’s 2009 document “Good Practice and Regulatory Guidance on Composting and Odour Control for Local Authorities” states that: *“The provision of a sufficient buffer zone or set back distance between a compost plant and the nearest sensitive receptor is desirable. A sufficient set back distance provides emissions from the site with a zone in which residual odour from the site can dilute and disperse before reaching a receptor”*.
- 2.8 Given the turn-around times of waste at the Ware ETS, and the lower odour potential of the finished materials, the operations are expected to be significantly less odorous than composting activities. Nevertheless, a 250 m buffer from the site boundary is shown in Figure 1 and this can be considered a very conservative radius of effect within which receptors may be affected by odour. The section of the A602 immediately north and south of the site does not provide any facilities for pedestrians or cyclists.
- 2.9 The nearest high sensitivity receptors within the 250 m radius are approximately 170 m to the west of the site. The next nearest receptors are to the north-west.
- 2.10 Regarding sensitive ecological sites, there are none within the vicinity of the site, and in any case flora and fauna of the habitat site are not expected to be sensitive to odour.
- 2.11 Meteorological data collected at Stansted Airport, located approximately 20 km north-east of the Application Site, has been used to inform the prevailing weather conditions in compiling this OMP. The wind rose for Stanstead, 2020 is shown in Figure 3.
- 2.12 Given that the predominant wind direction is south-westerly, as shown by the wind rose in Figure 3, the nearest residential receptors are located predominantly upwind of any odours emitted from the Ware ETS.

Process Description

2.13 The following activities will be undertaken at the Ware ETS:

- Storage and bulking of waste; and
- Minimal treatment of waste, some shredding or screening may take place with mobile equipment within the main building.

2.14 The types of waste accepted at the site and their storage arrangements are included below:

Waste Stream / Source	Storage on site and pollution prevention measures
Mixed 'black bag' residual municipal waste	Unloaded, stored and re-loaded within transfer station buildings. Waste will be managed on a first-in, first-out basis (organised using bays within the transfer buildings) and typically stored for up to 24 hours before onward transfer.
Bulky waste or recyclables	Unloaded, stored and re-loaded within transfer station buildings. A shredder may be used for bulky waste, within the building. Any recyclable waste streams would be stored separately to mixed residual waste, utilising the secondary transfer building.
Green waste and food waste	Unloaded, stored and re-loaded within transfer station buildings. Any green or food waste streams would be stored separately to mixed residual waste, utilising the secondary transfer building.
Low level clinical waste	Clinical waste accepted at the site would be that classified as 'lower level clinical waste', delivered in dedicated vehicles in a double bagged format (or specialised sealed containers), which would then be bulked in the wheeled eurobins for transfer using a dedicated vehicle. The clinical waste would therefore be handled separately from the local authority waste in the secondary transfer building and would not be mixed with it.

2.15 The waste description along with the associated codes are included below:

EWC Chapter	Waste description
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	15 01 packaging (including separately collected municipal packaging waste)
5 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
15 01 07	glass packaging
15 01 09	textile packaging
16	Wastes not otherwise specified in the list

EWC Chapter	Waste description
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	end-of-life tyres
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 19	plastic
16 01 20	glass
16 05	Gases in pressure containers and discarded chemicals
16 05 05	gases in pressure containers other than those mentioned in 16 05 04
16 06	batteries and accumulators
16 06 01*	lead batteries
16 06 02*	Ni-Cd batteries
16 06 03*	mercury-containing batteries
16 06 04	alkaline batteries (except 16 06 03)
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 01	Concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	Wood, glass and plastic
17 02 01	wood
17 02 02	glass
17 02 03	Plastic
17 04	Metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 06	Insulation materials and asbestos-containing construction materials
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03

EWC Chapter	Waste description
17 08	Gypsum-based construction material
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01
18	Wastes from human or animal health care and/or related research (except kitchen and restaurant wastes not arising from immediate health care)
18 01	wastes from natal care, diagnosis, treatment or prevention of disease in humans
18 01 01	sharps (except 18 01 03)
18 01 03*	wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 01 04	wastes whose collection and disposal is not subject to special requirements in order to prevent infection(for example dressings, plaster casts, linen, disposable clothing, diapers)
18 01 06*	chemicals consisting of or containing hazardous substances
18 01 07	chemicals other than those mentioned in 18 01 06
18 01 08*	cytotoxic and cytostatic medicines
18 01 09	medicines other than those mentioned in 18 01 08
18 01 10	amalgam waste from dental care
18 02	Wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 01	sharps (except 18 02 02)
18 02 02*	wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 02 03	wastes whose collection and disposal is not subject to special requirements in order to prevent infection
18 02 05*	chemicals consisting of or containing hazardous substances
18 02 06	chemicals other than those mentioned in 18 02 05
18 02 07*	cytotoxic and cytostatic medicines
18 02 08	medicines other than those mentioned in 18 02 07
20	Municipal Wastes (Household Waste and Similar Commercial, Industrial and Institutional Wastes) Including Separately Collected Fractions
20 01	Separately collected fraction (except 15 01)
20 01 01	paper and cardboard
20 01 02	glass
20 01 08	biodegradable kitchen and canteen waste
20 01 10	clothes
20 01 11	textiles
20 01 27*	paint, inks, adhesives and resins containing hazardous substances
20 01 28	paint, inks, adhesives and resins other than those mentioned in 20 01 27
20 01 33*	Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 34	Batteries and accumulators other than those mentioned in 20 01 33
20 01 35*	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components

EWC Chapter	Waste description
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 37*	Wood containing dangerous substances
20 01 38	wood other than that mentioned on 20 01 37
20 01 39	plastics
20 01 40	metals
20 02	Garden and park wastes (including cemetery waste)
20 02 01	Biodegradable waste
20 02 02	soil & stones
20 02 03	Other non-biodegradable waste
20 03	Other municipal wastes
20 03 01	Mixed municipal waste
20 03 07	Bulky waste

*denotes hazardous waste pursuant to Directive 91/689/EEC.

Odour Sources on Site

Generation of Odours at the Facility

2.16 There is the potential for odours to arise from storage of green garden waste and any residual waste on the site. The full list of potential odour sources at Ware ETS is as follows:

- Green Garden Waste (EW Chapter code 20 02)
- Residual Waste
- Cesspit
- Clinical Waste
- Municipal Waste (EW Chapter codes 20 01 08, 20 01 27/28)
- Construction and Demolition Waste

2.17 All waste handling will occur within the transfer station buildings. The only exception would be the designated quarantine area for rejected waste loads in the turning yard. Any rejected waste loads would remain in the delivery vehicle/container and be taken off site as soon as practicable. No odorous waste would be unloaded in the quarantine area.

2.18 If malodorous or hazardous waste is deposited on site, it will be cordoned off and kept separate from customers and other wastes. Arrangements will be made to collect this waste within a week or as soon as reasonably practicable using specialist contractors.

Waste Acceptance procedure

- 2.19 The ETS facility will provide suitable areas to segregate and store different waste streams for removal off-site. The site will not be open to the general public and would accept primarily local authority waste, including that from the adjacent RC.
- 2.20 On entering the site, waste delivery vehicles will be weighed at the weighbridge station and waste acceptance checks carried out. This would involve checking that the waste transfer/consignment note is present, correctly completed, and indicates that the waste is a type that can be accepted by the facility.
- 2.21 A waste transfer/consignment that is identified at this point as not being acceptable would be rejected and returned to its origin. Should any unacceptable waste be identified after unloading, it would be stored in the designated quarantine area, separated from other waste, until it can be collected and transported for treatment or disposal by an appropriately licensed waste carrier.
- 2.22 Only 'lower-level clinical waste' will be accepted at the site. This will be delivered in dedicated vehicles in a double-bagged format (or specialised sealed containers), which would then be bulked in the wheeled eurobins for transfer using a dedicated vehicle. The clinical waste would therefore be handled separately from the local authority waste and would not be mixed with it. No treatment (shredding) of hazardous or clinical waste will take place.
- 2.23 Waste procedure for outgoing loads:
- All waste for despatch is inspected and loaded by site operatives/contractors to confirm its description and composition.
 - All loads will be secured and sheeted where required.
 - All loads will be weighed on exit.
- 2.24 If a member of site staff notices an item of waste that is non-conforming they will inform the person in charge of the site. Site staff will then take the following action;
- Identify the material and whether it can be managed on site
 - If the material can be managed on site (i.e. it is a waste type that the site is permitted to accept), it will be safely removed and placed in the correct storage container elsewhere on site
 - If the material cannot be identified and is suspected to be hazardous OR if the material cannot be managed on site, the area will be cordoned off to all waste movements to ensure operative and public safety
 - The Site Manager 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 the site diary
- All instances of non-conforming waste will also be notified to the Operations Manager to allow for preventative actions to be put in place
- If required, the Environment Agency will be notified

2.25 Records will be kept of all wastes accepted at the site and for all wastes leaving site for recovery or disposal elsewhere.

3 Odour Control During Normal Operation

3.1 This section of the OMP describes how the ETS will control odour impacts from normal operations. A great deal can be done to minimise the quantities of odours at site or to minimise their release by good working practices and process control; whereas it is much more difficult to improve atmospheric dispersion. Therefore, the proposed facility works in accordance with the accepted hierarchy of preferred controls, that is:

- prevent formation/release of odour in the first place;
- where this is not practicable, minimise the release of odour;
- abate excessive emissions; then
- dilute any residual odour by effective dispersion in the atmosphere.

Good Working Practices/Housekeeping Measures to Minimise Odour Releases

Delivery of waste materials

3.2 On entering the site, waste delivery vehicles will be weighed at the weighbridge station and waste acceptance checks carried out. This will involve checking that the waste transfer/consignment note is present, correctly completed, and indicates that the waste is a type that can be accepted by the facility. The waste will be checked to identify if it conforms with the description.

3.3 A waste transfer/consignment that is identified at this point as not being acceptable will be rejected and returned to its origin. Should any unacceptable waste be identified after unloading, it will be stored in the designated quarantine area, separated from other waste, until it can be collected and transported for treatment or disposal by an appropriately licensed waste carrier.

Stock Management

3.4 The purpose of the transfer station is to efficiently process, sort (a small amount of waste may also be shredded) and bulk waste for onward transport and it will not provide long-term storage of waste. Waste deliveries will be processed on a first-in, first-out basis and typically removed from site within 24 hours for the main MSW waste stream. Storage for up to 7 days may be required to cover Christmas Day, Boxing Day and New Years Day Bank Holidays.

Non-Conforming Waste

3.5 If the material cannot be identified and is suspected to be hazardous OR if the material cannot be managed on site, the area will be cordoned off to all waste movements to ensure operative and public safety.

- 3.6 If the material cannot be identified and is suspected to be hazardous OR if the material cannot be managed on site, the area will be cordoned off to all waste movements to ensure operative and public safety.
- 3.7 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
- 3.8 If required, the Environment Agency will be notified.

Housekeeping and Cleaning Procedures

- 3.9 Site housekeeping inspections will be conducted and recorded when site is open on a daily inspection sheet shown in Table 3.2 and retained.
- 3.10 Any mud brought to the site will be cleared away and cleaned by site staff manually using brushes. If extreme circumstances arise then a mechanical sweeper will be utilised to clear all mud and debris as soon as possible.
- 3.11 All wastes will be deposited into the storage bunkers providing secure storage. Some wastes such as clinical waste, batteries and hazardous waste will be stored in containers. This will therefore help to contain the waste and help reduce the potential for litter generation. In the event of a significant litter problem including complaints from the client or neighbouring facilities, this will be reported as an incident in accordance with documented operating protocols/procedures and recorded in the site diary, with corrective and preventative actions taken. Any litter that escapes beyond the site boundary will be retrieved as soon as practicable.
- 3.12 HCC utilise a simple 'Stop-Contain-Divert' model for containing spillages and have spill kits and drain covers available on site to protect the surface water system and to prevent pollutants from entering the site drains. Site staff are trained and familiar with their use in an emergency situation through the use of spill drills.
- 3.13 The cesspit will be remained sealed and will be emptied when full in order to reduce odour production.
- 3.14 The schedule of housekeeping measures and their frequency is shown in [Table 3.1](#).
- 3.15 Housekeeping and cleaning procedures are kept under continual review through the recording of daily site inspections and associated monitoring of the effectiveness of any procedures applied.

Table 3.1: ETS - Housekeeping Schedule

Housekeeping Procedure	Frequency
Site Housekeeping Inspection	Daily
Olfactory Inspection	Daily
Site sweeping and removal of mud (manual)	Daily
Site Sweeping and removal of mud (mechanical)	As required
Litter/waste retrieval and disposal	Daily
Emptying of Cesspit	As Required

Table 3.2: ETS – Daily Site Diary/Inspection Sheet

Site:	Date:	Signature:
--------------	--------------	-------------------

Mark Y or N in the boxes below. Add any additional comments overleaf.

Daily Inspections AM.	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Staff PPE is in good condition?							
Fence and gates are secure?							
Maintenance of all surfaces in good condition?							
Correct waste in all bunkers/clinical waste, batteries and hazardous waste in correct containers?							
Are waste items stacked correctly?							
All signage in good condition?							
Are all welfare facilities clean?							
Site and surrounding area free of litter?							
Has any dust present been suppressed?							
Are there any odours present on site?							
Have any waste containers or any waste that is present in a bunker been on site for more than 7 days?							
Are outgoing vehicles loaded safely and netted before leaving site?							

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Any potential slips, trips or falls present?							
Are there any potential fire risks on site?							
Weekly Inspections: C/O on Monday	Y	N	NOTES				
Is the cesspit full / contaminated? (e.g. oil)							
Is there any damage to/leaks from bunkers or containers?							
Is the space between the skins in the oil tank dry?							
Hazardous waste is stored correctly, locked and recorded?							
Fire extinguishers are full & operational							
Diary is complete, incidents recorded & COTC times recorded							
Sites lights are operational							
Environmental permit & planning consent available. Telephone is in working order.							
There are sufficient absorbents on site							
Are ticket books / forms required?							
Are there any maintenance requirements?							
Monthly Inspection: C/O on 1st of the Month	Y	N	NOTES				
First aid kit is complete							
Electric meter has been read & called through.							
Quarterly: C/O on 1st of Jan/Apr/Jul/Oct	Y	N	NOTES				
Interceptors are free from contamination and shut off valve is working							
Vermin control have been on site and there are sufficient bait boxes laid down							
6 monthly: C/O on 1st of Jan/Jun	Y	N	NOTES				
Drainage channels clean & working							
Electrical items are all PAT tested							
Fire drill has been completed							

Additional Notes:

4 Odour Control During Maintenance and Abnormal Events

- 4.1 This section of the OMP deals with the management and control of odours during maintenance and emergency periods and is crucial to the Odour Management Plan. This section describes how the ETS will operate an action plan for abnormal event scenarios (including emergencies, maintenance, breakdowns, weather anomalies, etc). This is a summary of the foreseeable situations that may compromise the operator's ability to prevent and/or minimise odorous releases from the process and the actions to be taken to minimise the impact. Such actions may be as simple as temporarily preventing the input of feedstock to the more drastic shutting down of the plant. The action plan is intended to be used by operational staff on a day-to-day basis.
- 4.2 During normal operations, the odour emissions at the ETS can be expected to arise from multiple locations and activities (mainly green garden and residual waste) and can be largely controlled in some way by effective management and good housekeeping.
- 4.3 Site activities and waste streams are not expected to generate a high odour potential as there is very little biodegradable waste stored on site. However, if noticeable odour is perceived, this should be recorded on the Daily Site Inspection Sheet, then the offending waste will be removed from site as soon as possible to reduce and limit the potential for complaints or amenity issues from nearby receptors.
- 4.4 Additionally, where routine, planned and emergency maintenance of odour-critical plant or structures has to be carried out, and there is a likelihood of odour being released to atmosphere in quantities sufficient to result in detection off-site, a detailed risk assessment of the activity will be conducted. As part of this, issues of odour generation, release and control will be considered.
- 4.5 In the following pages, a tabular risk assessment has been compiled. This table:
- identifies the conditions under which abnormal operational conditions or failures might arise;
 - describes what these are;
 - summarises the potential impacts from the identified abnormal/failure situations and assesses the degree of those impacts; and
 - describes how these conditions could be prevented and/or mitigated and controlled.

Table 4.1: Abnormal operations and failures that have the potential to affect the process and lead to the generation of odour

Identify the release point(s) and areas	Identify possible abnormal operation or failure that would lead to an odour event	What are the consequences of such an abnormal situation or failure	What measures should be in place to prevent or reduce the abnormal situation or failure	What actions are should be taken and who will be responsible
Access route at facility (see Figure 2)	Delivery/pick up of a large volume of waste over a short period of time	Fugitive release of odours from vehicles unable to discharge their loads – left standing at the site entrance	All waste for despatch is inspected and loaded by site operatives/contractors to confirm its description and composition All loads will be secured and sheeted where required	The management team will be responsible for negotiating a contingency plan
	Accumulation of spill of materials from deliveries	Uncontrolled release of odours from open area source	Cleaning procedure and schedule for site entrance and outside areas. Liquid wastes are not typically accepted, in the unlikely event that liquid wastes were accepted they would be held in sealed containers and located away from vehicular movements. All such containers will be provided with secondary containment and would have a spill kit available for deployment in close proximity should a spillage occur. HCC utilise a simple ‘Stop-Contain-Divert’ model for containing spillages and have spill kits and drain covers available on site to protect the surface water system and to prevent pollutants from entering the site drains. Site staff are trained and familiar with their use in an emergency situation through the use of spill drills.	Site Manager to carry out regular inspections of all areas If spills detected, spilt materials and debris will be transferred to a quarantine area and kept separate from other waste. The clearing of the site by site staff is carried out manually using brushes. If extreme circumstances arise then a mechanical sweeper will be utilised to clear all debris as soon as possible Any leaks or spills will be recorded in the daily site diary.
	Accident involving delivery vehicle causing major spillage of materials	Uncontrolled release of odours from open area source – potential to lead to odour annoyance at sensitive receptors	Liquid wastes are not typically accepted, in the unlikely event that liquid wastes were accepted they would be held in sealed containers and located away from vehicular movements. All such containers will be provided with secondary containment and would	Site Manager to initiate accident response plan – delivery vehicle made safe. If drivable, remaining material reloaded. Spilt materials and debris immediately collected and transferred into the vehicle or into a quarantine area. Spill area then cleaned and hosed down

Identify the release point(s) and areas	Identify possible abnormal operation or failure that would lead to an odour event	What are the consequences of such an abnormal situation or failure	What measures should be in place to prevent or reduce the abnormal situation or failure	What actions are should be taken and who will be responsible
			<p>have a spill kit available for deployment in close proximity should a spillage occur.</p> <p>HCC utilise a simple ‘Stop-Contain-Divert’ model for containing spillages and have spill kits and drain covers available on site to protect the surface water system and to prevent pollutants from entering the site drains.</p> <p>Site staff are trained and familiar with their use in an emergency situation through the use of spill drills</p>	
Green Garden Waste (see Figure 2)	Delivery of particularly malodorous materials accepted on site	Fugitive releases of highly odorous emissions– potential to lead to odour annoyance at sensitive receptors	<p>Vehicles delivering waste will only be authorised to enter the site if their registration plates have been registered. On arrival, all vehicles will be weighed at the weighbridge station and all documentation will be checked.</p> <p>A visual inspection of loads during outloading ensure it complies with the acceptable waste codes and conforms to the description on the consignment note. Where, upon inspection, the waste does not conform to the description in the documentation supplied by the producer or holder it will be returned to the holder.</p> <p>Should any unacceptable waste be identified after unloading, it would be stored in the designated quarantine area, separated from other waste, until it can be collected and transported for treatment or disposal by an appropriately licensed waste carrier.</p>	If particularly odorous material arrives at the facility, it is identified as such and stored within a quarantine area before removal from site as soon as possible.

Identify the release point(s) and areas	Identify possible abnormal operation or failure that would lead to an odour event	What are the consequences of such an abnormal situation or failure	What measures should be in place to prevent or reduce the abnormal situation or failure	What actions are should be taken and who will be responsible
	Material not processed within the planned maximum storage period	Potential for fugitive odorous emissions– may cause odour to be detected at nearby sensitive receptors	Delivered waste to be processed as quickly as possible – the maximum residence time for materials in the bunkers is 7 working days after filling, Unavailability of disposal facilities could result in waste remaining on site for a longer period however this would be mitigated by diverting material to alternative disposal facilities under the County Council contracts.	If there is a problem with any of the equipment/machinery/deliveries, the Site Manager will ensure that it is replaced, repaired or rearranged as quickly as possible
	Extended period (>3 days) of very hot weather (>25 °C) forecast or experienced	Higher than normal decomposition rates of waste residues and enhanced odour emissions	The ETS will monitor weather conditions and forecasts and take additional measures to ensure that wastes identified as malodorous are removed from the site as soon as practicably possible.	The management team will monitor weather and forecasts to anticipate extended hot spells. Site Manager to check for odorous wastes during the daily site inspection and arrange for removal as soon as practicably possible.
	Odour complaint received or odour detected beyond the site boundary	Potential to disrupt or irritate local sensitive receptors with odour	Records of complaints kept and reviewed during the regular review held at least once annually. Daily Site inspection to take into account any particularly odorous substances	Site Manager to check for odorous wastes during the daily site inspection and arrange for removal as soon as practicably possible Any pollution incident will be dealt with immediately and the Environment Agency will be informed of this and any action taken. This will be done by telephone ASAP 0800 80 70 60 and then followed up in writing to the Agency's local office. In addition, all Environmental as well as Health & Safety Incidents including complaints from customers and / or members of the public will be reported in accordance with documented operating protocols/procedures.

Identify the release point(s) and areas	Identify possible abnormal operation or failure that would lead to an odour event	What are the consequences of such an abnormal situation or failure	What measures should be in place to prevent or reduce the abnormal situation or failure	What actions are should be taken and who will be responsible
Residual Waste	Delivery of particularly malodorous materials	Potential for odorous emissions to the open air—may cause odour to be detected at nearby sensitive receptors	<p>Vehicles delivering waste will only be authorised to enter the site if their registration plates have been registered. On arrival, all vehicles will be weighed at the weighbridge station and all documentation will be checked.</p> <p>A visual inspection of loads during outloading ensure it complies with the acceptable waste codes and conforms to the description on the consignment note. Where, upon inspection, the waste does not conform to the description in the documentation supplied by the producer or holder it will be returned to the holder.</p> <p>Should any unacceptable waste be identified after unloading, it would be stored in the designated quarantine area, separated from other waste, until it can be collected and transported for treatment or disposal by an appropriately licensed waste carrier.</p>	If particularly odorous material arrives at the facility, it is identified as such and stored within a quarantine area before removal from site as soon as possible
	Extended period (>3 days) of very hot weather (>25 °C) forecast or experienced	Higher than normal decomposition rates of waste residues and enhanced odour emissions	The ETS will monitor weather conditions and forecasts and take additional measures to ensure that wastes identified as malodourous are removed from the site as soon as practicably possible.	The management team will monitor weather and forecasts to anticipate extended hot spells. Site Manager to check for odorous wastes during the daily site inspection and arrange for removal as soon as practicably possible.

Identify the release point(s) and areas	Identify possible abnormal operation or failure that would lead to an odour event	What are the consequences of such an abnormal situation or failure	What measures should be in place to prevent or reduce the abnormal situation or failure	What actions are should be taken and who will be responsible
	Odour complaint received or odour detected beyond the site boundary	Potential to disrupt or irritate local sensitive receptors with odour	Records of complaints kept and reviewed during the regular review held at least once annually. Daily Site inspection to take into account any particularly odorous substances	Any pollution incident will be dealt with immediately and the Environment Agency will be informed of this and any action taken. This will be done by telephone ASAP 0800 80 70 60 and then followed up in writing to the Agency's local office. In addition, all Environmental as well as Health & Safety Incidents including complaints from customers and / or members of the public will be reported in accordance with documented operating protocols/procedures,
Cesspit	Odour emission and detection	Potential to disrupt or irritate local sensitive receptors with odour	Cesspit is kept sealed There is a high-level alarm to inform the Site Manager of a leak which may produce odour. Cesspit is emptied when full to prevent leaks and odour production.	Any pollution incident will be dealt with immediately and the Environment Agency will be informed of this and any action taken. This will be done by telephone ASAP 0800 80 70 60 and then followed up in writing to the Agency's local office. In addition, all Environmental as well as Health & Safety Incidents including complaints from customers and / or members of the public will be reported reported in accordance with documented operating protocols/procedures,

5 Routine Maintenance and Inspection

- 5.1 This section of the OMP describes how the ETS will address the following issues to help maintain the effectiveness of odour controls:
- site performance; and
 - planned inspection and maintenance.
- 5.2 Planned maintenance and inspection is crucial to maintaining the effectiveness of odour control measures. The ETS ensures the good performance of all plant and equipment. An effective, planned inspection and preventative maintenance programme is employed on all odour-critical plant and equipment. This includes:
- a written maintenance programme; and
 - a record of maintenance.

Maintenance of Site and Equipment

- 5.3 The ETS will specifically identify on its maintenance programme the items of plant and equipment that are odour critical, i.e. they themselves are critical in containing or controlling odour releases, or they would have a knock-on effect on the site's ability to turnaround stock within the target time if they were to fail.
- 5.4 The Operations Manager and designated supervisors will be trained to ensure they fully understand and are able to implement and understand the responsibilities for maintenance, defect reporting and rectification on plant and infrastructure.

Control of Fugitive emissions

- 5.5 Any mud brought to the site will be cleared away and cleaned by site staff manually using brushes. If extreme circumstances arise then a mechanical sweeper will be utilised to clear all mud and debris as soon as possible.
- 5.6 All wastes will be deposited into bunkers (or containers – clinical waste, batteries, hazardous waste) providing secure storage. The main building would have an air handling system to provide odour control, maintaining a slight negative pressure within the building, to avoid release of odorous air when the transfer building doors are opened. Odour control will be provided using activated carbon filters (carbon adsorption) and the filtered air from these units will be exhausted through one stack, located to the north of the main building and another stack located to the north-east of the additional building. Waste will be moved on from the buildings quickly to further

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- minimise the build-up of odour. This will therefore help to contain the waste and help reduce odour emitting releases.
- 5.7 Liquid wastes are not typically accepted, in the unlikely event that liquid wastes were accepted they would be held in sealed containers and located away from vehicular movements. All such containers will be provided with secondary containment and would have a spill kit available for deployment in close proximity should a spillage occur.
- 5.8 If noticeable odour is perceived, this should be recorded on the Daily Site Inspection Sheet, then the offending waste will be removed from site as soon as possible
- 5.9 Any issues relating to the fugitive emissions associated with the operation of the waste transfer facility will be recorded in the site diary, along with any corrective and preventative actions taken by site staff.

6 Routine Monitoring, Recording and Reporting

- 6.1 Monitoring has an important role to play in assessing the effectiveness of operational practices to prevent and contain odours; and in assessing the nature and extent of an odour problem should it arise.
- 6.2 This section of the OMP describes how the effectiveness of operational practices and controls will be checked by:
- monitoring of changes on site; and
 - monitoring of effects off site (at the site boundary and beyond).

Monitoring of Odour Emissions at Source

- 6.3 In the widest sense, the term 'monitoring' can include both emissions monitoring of odour (or a surrogate parameter) and inspections of the process, buildings and equipment to check that emissions are being contained and controlled to meet the accepted standards of good practice in relevant guidance. As there are no continuous controlled point source odour releases from the ETS, no monitoring of odour emissions at source is carried out. Monitoring of odour at the boundary or at receptors is described below.

Monitoring of Odour at the Site Boundary and Sensitive Receptors

General Approach to Site Monitoring

- 6.4 The Site Manager is responsible for monitoring odour levels at the site boundary and sensitive receptors and area supervisors will also check this during their inspections. Odours will be monitored using sniff tests in accordance with the protocol in EA guidance H4.
- 6.5 Olfactory monitoring will be conducted and recorded when the site is open on a daily odour inspection form shown in [Table 6.1](#) and retained.

Table 6.1: Daily Odour Inspections Sheet (drawn from EA guidance H4)

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					
Intensity 0 No odour 1 Very faint odour 2 Faint odour 3 Distinct odour		4 Strong odour 5 Very strong odour 6 Extremely strong odour Ref: German Standard VDI 3882, Part 14		Receptor sensitivity Low (e.g. footpath, road) Medium (e.g. industrial or commercial workplaces) High (e.g. housing, pub/hotel etc)	

Complaints Monitoring

- 6.6 Quite separate from the procedural response to a received complaint (covered later in section 7) is the monitoring of complaints levels. Reliable complaints should be considered a form of monitoring and complaints should be treated as if they were monitoring data.
- 6.7 Complaints are a very important indicator of community dissatisfaction (although not the only one) and the technique of complaints monitoring is a powerful tool. However, it is important to bear in mind that complaints are only a symptom of annoyance or nuisance; there are various reasons why complaint level is not an exact indicator of odour annoyance or nuisance itself. Nevertheless, the collection, maintenance and analysis of complaints records is an important method of indicating the effectiveness or otherwise of measures implemented to reduce nuisance due to odour.
- 6.8 The ETS will implement a system of complaints monitoring and analysis. Complaints are collected, registered and validated as described in Section 7 of this OMP. The record of complaints received at the end of each calendar quarter will be reviewed with a view to identifying:
- trends, in terms of the subject, cause or origin of complaints; and
 - aspects experienced at one location that could apply to other locations.
- 6.9 Any action deemed necessary as a result of the analysis shall be identified and discussed in order to programme a course of corrective actions.

Recording of Results, Reporting and Actions

- 6.10 Site inspections will be conducted and recorded when site is open on a daily inspection sheet shown in Table 3.2 and retained.
- 6.11 Any records required to be submitted will be supplied to the Environment Agency within 14 days where the records have been requested in writing by the Agency.
- 6.12 As per condition 4.3.1.c of the permit, the Agency will be notified following the detection of:
- Any malfunction, breakdown or failure of odour-critical equipment or techniques, accident or fugitive emission which has caused, is causing or may cause significant odour annoyance;
 - The breach of a limit specified in the permit; or
 - Any significant adverse environmental effects.

Actions in the Event of Abnormal Emissions

- 6.13 Emissions from the activities shall be free from odour at levels likely to cause annoyance outside the site, as perceived by an authorised officer of the Agency, unless the licence holder has used appropriate measures to prevent or where that is not predictable, to minimise, the odour.
- 6.14 In the event of abnormal emissions (e.g. visual inspections, alarms, verified complaints, or monitoring beyond the site boundary), the Site Manager or General Manager would take the following actions:
- Unavailability of disposal facilities could result in waste remaining on site for longer than the proposed 7 working days and could result in odour generation. However, this would be mitigated by diverting material to alternative disposal facilities under the County Council contracts.
 - Hot weather has not been found to create significant odour production increases, but this would be monitored by the Site Manager and if a load was identified as being odorous, then they would organise for the load to be removed as soon as practicably possible.

7 Management Controls

- 7.1 This section of the OMP provides information on:
- staffing responsibilities;
 - staff training;
 - complaint management, investigation and resolution procedures;
 - provision of a complaints telephone line; and
 - communications with external stakeholders.

Roles and Responsibilities

- 7.2 HCC is committed to managing effectively the impacts of any odours from the ETS. This commitment extends from policies produced at the top level, to the resources available to the competent personnel, to the abilities of the personnel managing odour-critical work tasks. This section describes the responsibility for the management and operation of the ETS.
- 7.3 HCC has appointed managers with the executive authority and responsibility for implementing the Management System. Work instructions, job descriptions and procedures exist for the critical areas of the Company's activity and have been issued or made available to personnel responsible for undertaking these tasks.
- 7.4 HCC has a documented management structure for managing the impacts of odour from the ETS. The facility and its operations are under the direct supervision of a nominated Technically Competent Manager by the permit holder, HCC. The Technically Competent Manager will be qualified by means of holding a Certificate of Technical Competence or Operator Competence Certificate issued by WAMITAB or equivalent Agency-recognised alternative relevant to the site as agreed with the Agency.
- 7.5 It is the responsibility of the Technically Competent Manager and the Site Manager, with the support of environmental professionals, to identify environmental risks that are relevant to each site and determine if a particular activity or service is environmentally significant, and to ensure the site is being operated in accordance with the Environmental Permit and in-line with attendant regulations. Once identified, it is their responsibility to highlight the significant impacts to all relevant employees and contractors. The Technically Competent Manager and the Site Manager are also responsible for monitoring and managing all activities under the Company's control to improve environmental performance and must complete the appropriate register to identify all activities or services that are relevant to site operations and an indication of potential impacts.
- 7.6 The Site Manager would be responsible for the following tasks:

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- implementing and maintaining the OMP;
- responding to odour-related incidents and any elevated odour levels from the aforementioned checks/inspections/surveys, monitoring, or on receipt of complaints of odour nuisance; including carrying out investigations and taking appropriate remedial action to prevent recurrence;
- keeping records of all activities and actions relating to odour and the OMP.

7.7 The Technically Competent Manager would be responsible for the following actions

- planned maintenance and repair and the keeping of essential odour-critical spares;
- regular review (at least once per year) of the effectiveness of odour controls - including the OMP itself - taking account of complaints, monitoring results, inspections, surveys and other information and feedback received. This interval may be shorter if there have been complaints or relevant changes to your operations or infrastructure;
- engaging with your neighbours and communicating with relevant interested parties (e.g. local community and local authority) to provide necessary information and minimise their concerns and complaints, including methods used, content and frequency of communication.

7.8 All site staff are subject to training that includes their individual requirements to check material acceptance of the site and their responsibility to inform the Site Manager of any specific issues.

7.9 Where a site operative becomes aware of a potential odour release from the site it must be reported to the Site Manager as soon as practical. It is the responsibility of the Site Manager and to resolve any potential odour issues. Any complaints or issues relating to the surrounding land use will be directed to the Site Manager for dialogue and a suitable conclusion.

7.10 The Site Manager will review all control measures in place in the event that an odorous emission is substantiated off site. Any control measures seen to be failing following a review will have new controls agreed and implemented.

Training and Competence

General Procedures for Training and Competency of Staff

7.11 The company identifies training requirements of its employees and provides suitable resources to ensure they have the required knowledge, skills and expertise to carry out their duties. This includes their roles and responsibilities in complying with the policy statements and all relevant legislation. This is achieved through induction training for new employees and specific training as required. Contractors and all persons performing tasks on behalf of the Company will be made aware of the policy and relevant requirements and will be competent in the roles undertaken.

- 7.12 All the ETX personnel will receive ongoing training based upon identified needs; any staff deficient in knowledge and understanding of this procedure will be nominated for additional training.

Training and Competency of Operational Staff at the ETS

- 7.13 All employees will be required to be familiar with the Environmental Controls and Emergency Procedures required on site. All employees will be made fully aware of the need to be constantly vigilant with regard to site odour control and management procedures.
- 7.14 Staff responsible for the operation, maintenance or repair of the facility will be trained and competent. Records will be maintained (documented training records) demonstrating compliance with this. In order to minimise risk of emissions, particular emphasis will be given during training to:
- awareness of their responsibilities for avoiding odour nuisance;
 - identifying waste types which are permitted for acceptance at the site under the site's Environmental Permit and those wastes which are not;
 - identifying appropriate storage areas for different wastes and recognising storage limits;
 - quarantine and removal procedures for malodourous waste;
 - minimising emissions on start-up and shut-down; and
 - actions to minimise emissions during abnormal conditions.
- 7.15 The ETS will maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment.
- 7.16 Management staff will review and update their training as necessary and will review staff training systems at the facility.
- 7.17 All training will be controlled and monitored via a computerised database.

Complaints Handling and Communications

- 7.18 The ETS has in place a comprehensive system of monitoring and inspection to check odour control measures are functioning effectively at the ETS. However, in the event that an odour complaint is received, it is important that complaints are properly and systematically dealt with and acted upon.
- 7.19 This section of the OMP describes:
- How HCC will respond to any odour complaint;

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- How the ETS will investigate any odour complaints, take the appropriate steps and actions, and keep stakeholders informed; and
- How the ETS will communicate to appropriate bodies routinely and in response to any incidents or planned maintenance;
- Complaint Registration.

7.20 In the event of a complaint, complainants can:

- Contact a member of staff. This may be a member of staff who has been involved in providing the service directly to the customer or their line manager.
- Go online and complete the form at www.hertfordshire.gov.uk/complaints
- Telephone 0300 123 4047 or email contact@hertfordshire.gov.uk.

7.21 The customer service manager can also be contacted directly using the following details;

- Allison Short (Customer Services Manager)
Environment and Infrastructure Department
CHN115
1st Floor North West Block, County Hall, Pegs Lane, Hertford SG13 8DN
- Telephone: 01992 555211
- Email: environment.customerservices@hertfordshire.gov.uk

7.22 Complaints will be acknowledged within 3 working days of receiving it. The complainant will be told who is going to be looking into it and when they should receive a response. This is usually within 10 working days although sometimes longer may be needed. The complainant will be told if this is the case and how long it will take to give a response.

Investigation of Odour Complaints

7.23 A manager will look into the complaint and will provide a response. This can be by letter or email or, if preferred, a telephone call.

7.24 This part of the procedure is called stage 1. If the complainant is not happy with the outcome, a request can be made to consider the complaint at stage 2. In some serious cases, the complaint may be referred to stage 2 immediately.

7.25 For each complaint the Odour Complaint Report Form shown in [Table 7.1](#) will be filled out for submission to the Customer Services Manager.

Table 7.1: Odour Complaint Report Form

Odour Complaint Report Form	
Time and date of complaint:	Name and address of complainant:
Telephone number of complainant:	

Date of odour:	
Time of odour:	
Location of odour, if not at above address:	
Weather conditions (i.e., dry, rain, fog, snow):	
Temperature (very warm, warm, mild, cold or degrees if known):	
Wind strength (none, light, steady, strong, gusting):	
Wind direction (eg from NE):	
Complainant's description of odour:	
<input type="radio"/> What does it smell like?	
<input type="radio"/> Intensity (see below):	
<input type="radio"/> Duration (time):	
<input type="radio"/> Constant or intermittent in this period:	
<input type="radio"/> Does the complainant have any other comments about the odour?	
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure):	
Any other relevant information:	
Do you accept that odour likely to be from your activities?	
What was happening on site at the time the odour occurred?	
Operating conditions at time the odour occurred (eg flow rate, pressure at inlet and pressure at outlet):	
Actions taken:	

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Form completed by:	Date	Signed
--------------------	------	--------

Intensity

0 No odour	3 Distinct odour	5 Very strong odour
1 Very faint odour	4 Strong odour	6 Extremely strong odour

Further investigation of the complaint

- 7.26 Requests for complaints to go to stage 2 should be made in writing to the customer services manager using the contact details shown in paragraph 7.22 above, no later than 28 working days after you receive the stage 1 response. An acknowledgement will be received within 3 working days of receipt that the complaint is being investigated further.
- 7.27 The Customer Services Manager will offer to meet with the complainant to discuss the complaint. The Customer Services Manager will also meet members of staff who have been involved and anyone else who has relevant information about the complaint.
- 7.28 A report will be produced by the Customer Services Manager and sent to the Director of Environment and Transport. The report will say whether the complaint has been upheld (in whole or in part) or not. It will contain recommendations for action to put things right if the complaint has been upheld. The Director of Environment and Transport will write to the complainant to say whether he agrees with the report and recommendations and what action will be taken.
- 7.29 Stage 2 will be completed within 25 working days of receipt of the request that the complaint go to stage 2. If for any reason this is not possible, the Customer Services Manager will contact the complainant within that period to explain the reason for the delay and inform them when stage 2 will be completed.
- 7.30 If the complainant is not satisfied with the outcome of stage 2 they can ask the Local Government and Social Care Ombudsman to investigate. The Ombudsman is completely independent of the Council. Complainants can contact the Ombudsman's advice line on 0300 061 0614; or submit their complaint online at the website www.lgo.org.uk.

Actions in the Event of Multiple Complaints

- 7.31 Emissions from the activities will be free from odour at levels likely to cause annoyance outside the site, as perceived by an authorised officer of the Agency, unless the licence holder has used appropriate measures to prevent or where that is not predictable, to minimise, the odour.
- 7.32 In the event of multiple complaints within a short time frame resulting from abnormal odour detected beyond the site boundary the Site Manager or General Manager would take the following actions:
- Unavailability of disposal facilities could result in waste remaining on site for longer than the proposed 7 working days and could result in odour generation. If this was found to be the

cause of multiple complaints, then operations on site would cease and material would be removed or diverted to alternative disposal facilities under the County Council contracts.

- Hot weather has not been found to create significant odour production increases, but if multiple complaints coincided with the delivery of a load identified as being odorous, then they would organise for the load to be removed as soon as practicably possible.

Communicating with External Stakeholders

7.33 The Agency will be notified following the detection of:

- Any malfunction, breakdown or failure of equipment or techniques, accident or fugitive emission which has caused, is causing or may cause significant pollution;
- The breach of code 3.4.1.7; and
- Any significant adverse environmental health effects.

7.34 If any complaint is made by a member of the public about any matter associated with the facility, HCC will give notice in writing to the Environment Agency no later than the next working day after the complaint is received. This written notification will normally be in the form of an email. The notification will include a description of the complaint, the name and address of the person making the complaint and the action proposed as a result. Depending on the nature of the complaint, it will not always be possible to resolve the matter within this short timescale. In such cases an indication will be given that further investigations are necessary.

Communicating with External Stakeholders – Complainants

7.35 HCC does not communicate with complainants directly. All communication is done through HCC as there is no direct line to the site.

OMP Updating and Review

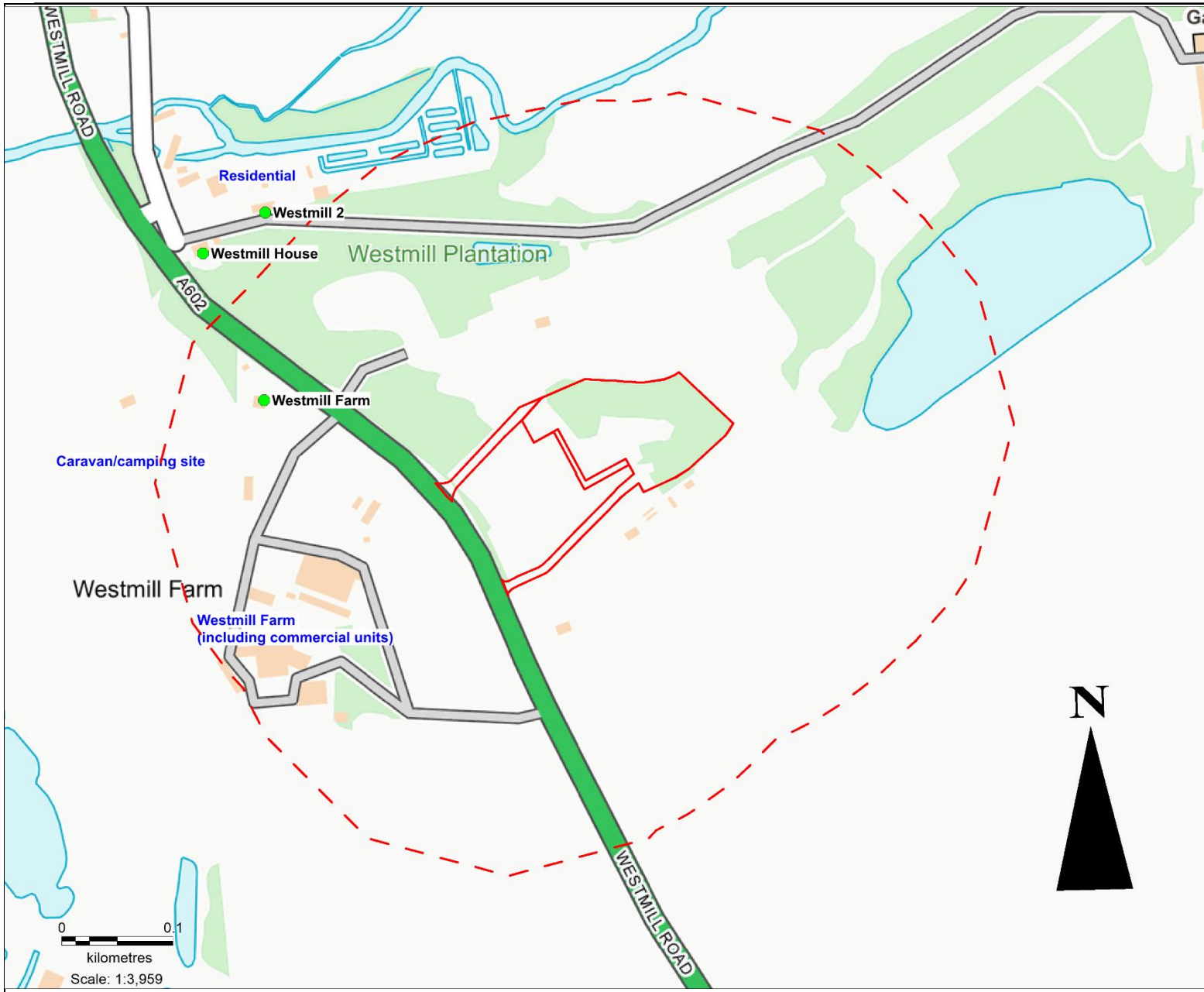
7.36 The Site Manager is responsible for maintaining, updating and reviewing the OMP.

7.37 The Environment Agency will be provided reasonable access to audit the implementation of the OMP, complaints records and records of the ETS' compliance with the OMP.

7.38 The ETS should provide for improvements in management practice and organisation, to allow the OMP to be a living document, whereby changes to site, equipment and practices that improve the operation of the facility and do not detract from overall environmental performance, are not unduly delayed or hindered. It is envisaged that the OMP will be reviewed and updated at least on an annual basis.

7.39 Save for reformatting, Sections 6 and 7, on monitoring and management respectively, will not be altered without consultation with the Environment Agency.

Figures



● High Sensitivity Receptors
 Odour_Buffer
 Site Boundary

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Notes

1. This drawing has been prepared in accordance with the scope of RPS' appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.

MAKING COMPLEX EASY

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T 01273 546800 F 01273 546801
E rpsbn@rpsgroup.com W rpsgroup.com

Client: Hertfordshire County Council

Project: Eastern Transfer Station,

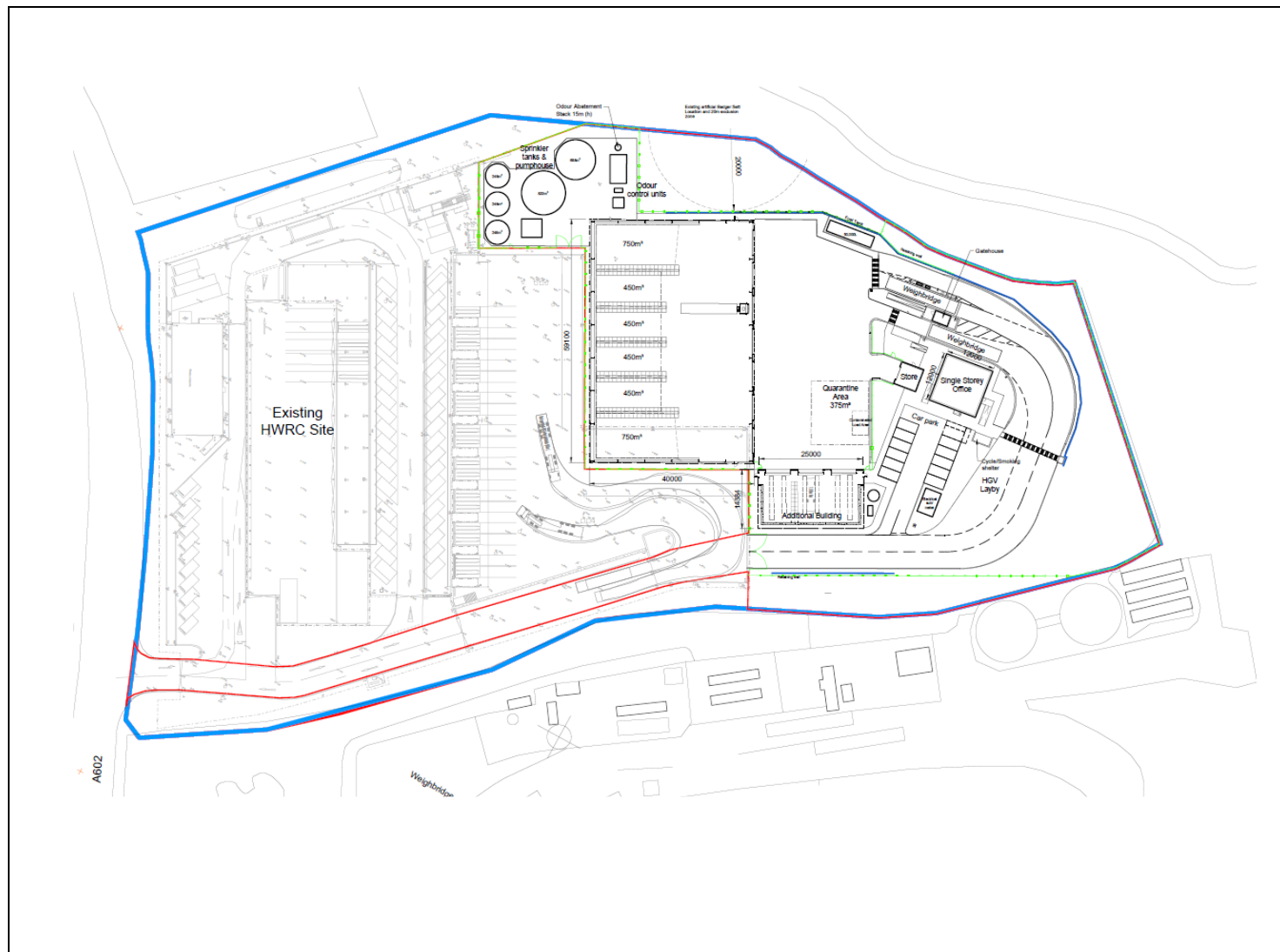
Job Ref: JAR11381

File location:

Date: 30/09/2021	Rev: 1
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Drawn: WH	Checked:
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Figure 1: Site Location and Receptors



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Notes

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Client: Hertfordshire County Council

Project: Eastern Transfer Station

Job Ref: JAR11381

File location:

Date: 23/8/2021

Rev: 0

Drawn: SG

Checked: WH

Figure 2: Site Layout

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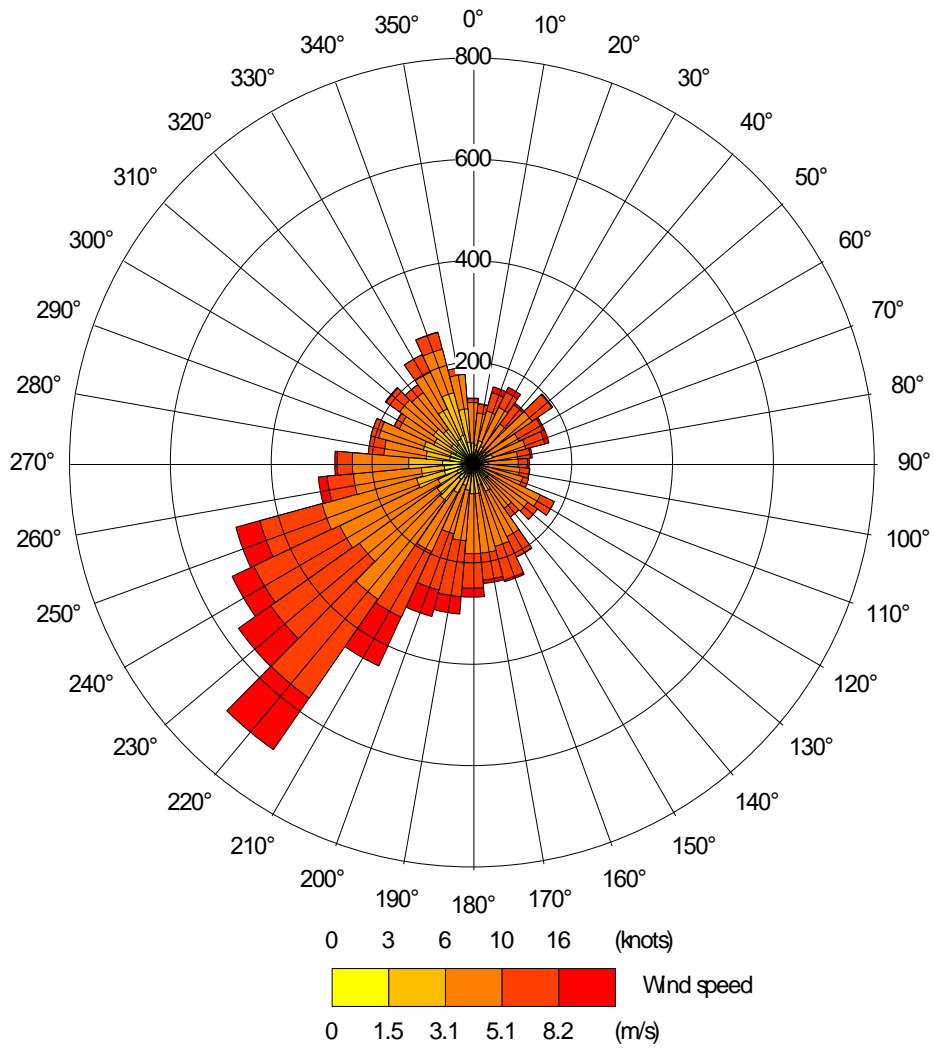


Figure 2: Wind Rose, Stansted 2020

Project Number	JAR11381	Project Title	Eastern Transfer Station		
Client:	Hertfordshire County Council	Rev :	0	Drawn By:	FP
		Date:	23/8/2021	Checked By:	WH
File location:					

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