



ENVIRONMENTAL MANAGEMENT SYSTEM

Environmental Permit EPR/WE1063AB

Odour Management Plan

Reference: EMS-OP-04

Version 3 Dated 24 June 2024

Phoenix Yard, Swinborne Road, Burnt Mills Industrial Estate, SS13 1EF

DOCUMENT CONTROL SHEET

Version Reference	Date	Reason for Change	Issued by
1	31.3.2023	Application to vary permit	ARC
2	29.5.2024	Include Contingency	ARC
3	24.6.2024	EA request	ARC

CONTENTS

1	INTRODUCTION.....	1
1.1	Purpose.....	1
1.2	Roles and Responsibilities.....	2
1.3	The Operator.....	2
1.4	Scope.....	2
1.5	Management System.....	2
1.6	Site Location.....	3
2	OPERATIONS.....	4
2.1	Waste Deliveries to Site.....	4
2.2	On Site Waste Acceptance.....	4
2.3	Overview of Waste Processing.....	5
3	ODOUR MANAGEMENT.....	9
3.1	Responsibility for Implementation of the Odour Management Plan.....	9
3.2	Source.....	9
3.3	Pathway.....	10
3.4	Receptors.....	10
3.5	Assessment.....	13
3.6	Mitigation.....	16
3.7	Contingency.....	16
4	ODOUR REPORTING.....	21
4.1	Complaints.....	21
4.2	Engagement with the Community.....	22
4.3	Pro-Active Monitoring.....	22
4.4	Reactive Odour Monitoring.....	24



Odour Management Plan

Document Reference EMS-OP-04

Issue Number: 3

Issue Date: 24.6.2024

1 INTRODUCTION

1.1 Purpose

The purpose of these procedures is to guide staff and contractors in the safe conduct of their duties in a manner which controls the environmental impacts of the company's operations, with specific reference to odour management.

With reference to Environment Agency guidance "*you must prevent, or where that is not possible, minimise odour if you have a waste, mining waste or installation permit.*" It requires an Odour Management Plan if "*your site causes odour pollution, or if you carry out any of the following activities:*

- *landfilling biodegradable waste*
- *household, commercial and industrial waste transfer station*
- *composting in open windrows*
- *composting in vessels*
- *mechanical biological treatment*
- *sewage sludge treatment*
- *clinical waste treatment*
- *animal carcass incineration*
- *pet cemetery*
- *mobile plant for landspreading, the treatment of land for land reclamation, restoration or improvement and landspreading of sewage sludge*
- *anaerobic digestion*
- *mobile plant for the treatment of waste soils and contaminated material, substances or products manufacture, use or recovery of compounds containing sulphur, ammonia, amines and amides, aromatic compounds, styrene, pyridine and esters*
- *abattoirs and renderers*
- *food production involving any form of cooking or heating and brewing*
- *refineries*
- *distilling or heating tar or bitumen"*

The site is currently operating with Standard Rules Permit SR2015 No6: 75kte household, commercial and industrial waste transfer station with treatment. The permit was issued on 19 February 2021.

A permit variation to allow up to 120,000 tonnes per annum will change this to a bespoke permit. However, the increased annual tonnage will not increase the likelihood of odour. Waste-A-Way (WAW) operates a fleet of articulated lorries. A constant flow of bulk vehicles is planned to attend the WTS throughout each day to ensure that waste in all bays is maintained at such a level as to ensure that it is removed within 24 hours of arrival.



Odour Management Plan

Document Reference EMS-OP-04

Issue Number: 3

Issue Date: 24.6.2024

The site receives waste from Local Waste Collection Authorities, both “black bag” waste and kerbside recycling, as well as similar commercial waste. The waste is bulked loaded for transfer off-site. The site also receives garden waste from local authorities and provides temporary storage for bulky waste, that may contain Persistent Organic Pollutants (POPs). The site does not receive source-segregated food waste from households or businesses.

To date, there have been no complaints relating to odour.

1.2 Roles and Responsibilities

The Technically Competent Manager has responsibility for ensuring these procedures are adhered to which includes communication with staff and contractors, and the provision of adequate training.

The Technically Competent Manager is responsible for updating and re-issuing these procedures as necessary and ensuring all staff are trained in new procedures.

1.3 The Operator

WAW is a major bulk waste logistics operator with over 20 years' experience. Family-owned and based in Basildon, it has additional depots in north Essex and Kent, operates a fleet of 70 HGVs and moves in excess of two million tonnes of waste and recyclable material each year.

Amongst many major contracts with public and private sector organisations, it is the prime bulk waste haulier for Essex County Council (managing 350,000 tonnes per annum) and West London Waste Authority (managing 100,000 tonnes per annum) and is contracted with Basildon Borough Council and Castle Point Borough Council to provide waste reception, bulking and transfer for their kerbside collected waste and recycling materials at its Basildon depot.

1.4 Scope

These Operational Procedures cover:

- Operations involving non-hazardous waste
- Treatment of non-hazardous waste

The procedures relate to the permitted activities at Phoenix Yard, Swinborne Road, Burnt Mills Industrial Estate, SS13 1EF.

1.5 Management System

The Management System covers all aspects of operations and aims to effectively manage the impacts of the business on the environment. The key documents include:

- a) Documents: Procedures to set out how to undertake operations and checking for any issues.



Odour Management Plan

Document Reference EMS-OP-04

Issue Number: 3

Issue Date: 24.6.2024

- EMS-OP-01 Operational Procedures
 - EMS-OP-02 Emergency Planning
 - EMS-OP-03 Fire Prevention Plan
 - EMS-OP-04 Odour Management Plan
- b) Forms on which to record information and provide evidence of the system functioning properly.

Cross referencing to specific aspects in the EMS has been made in this report.

All documents will be kept in the site office.

1.6 Site Location

The procedures relate to the permitted activities at Phoenix Yard, Swinborne Road, Burnt Mills Industrial Estate, SS13 1EF.

The site is within a busy, established, industrial estate. Other occupants include garages, waste operators, engineering and freight operators.

Residential properties are over 200m from the site, the nearest being 225m north east of the site.

There is a sewage treatment works, 230m north west of the site.



Odour Management Plan

Document Reference EMS-OP-04

Issue Number: 3

Issue Date: 24.6.2024

2 Operations

2.1 Waste Deliveries to Site

The operations at the site are a straightforward transfer facility only. The site will receive waste collected by or on behalf of local authorities, or commercial mixed waste only. The waste will predominantly be EWC 200301 Mixed Municipal Waste. This will include black bag residual waste and source segregated dry recyclables. Garden waste is also received and transferred from the site (EWC 200201).

The site also receives and transfers bulky waste, and soft furnishings that may contain Persistent Organic Pollutants (POPs). Both are classified EWC200307. POPs may be found in soft furnishings (sofas, sofa beds, chairs, stools, futons and beanbags). From the 1 January 2023, these wastes were no longer permitted to be sent to landfill. As a result, local authorities collecting these wastes through their bulky waste collection service, required temporary storage sites, pending transfer to an authorised treatment facility.

The waste is received under contract with Local Collection Authorities for specific waste streams. For similar commercial waste, WAW will also have contracts in place to routinely collect/accept this waste. Prior to receiving commercial waste, the customers will be informed of the acceptable waste types.

The site is permitted to receive waste during the following hours:

Monday to Friday	0700 – 1800
Saturday	0700 – 1600
Public Holidays	0700 – 1600
Sunday	No Operations

Waste deliveries are made throughout the working day. Typically, 40 loads are delivered each day. The waste is removed from the site in bulk haulage lorries. Approximately 15 loads are removed each day. However, these lorries use a different door. The WTS is co-located with the fleet operating centre and operations control centre. The WTS receives a steady, commensurate flow of bulk collection vehicles sufficient to respond to inbound demand.

2.2 On Site Waste Acceptance

Waste acceptance procedures involve:

- **Documentation.** The driver will arrive at the site and provide Waste Transfer Notes to the site office and the load will be weighed.
- **Visual checks.** The vehicle will be directed to a loading bay, depending on the contents of the load. As the waste is unloaded, a visual check will be carried out to ensure that the waste is acceptable.
- **Exit from site.** The driver will then drive out of the building and leave the site.



Odour Management Plan

Document Reference EMS-OP-04

Issue Number: 3

Issue Date: 24.6.2024

Any incidents of non-conformance will be recorded in the Non-Permitted Waste Form EMS-FR-02. The waste will be from approved contracts, either the waste collection contractor, local authority or a commercial client. The site does not accept ad-hoc inputs from non-contracted customers. The residual waste (household and commercial) mixed dry recycling and garden waste will be delivered in Refuse Collection Vehicles.

Bulky waste may arrive in rollonoff containers, caged vehicles or vans. This waste is not likely to generate odour.

The waste that has the highest potential for causing odour (residual black bag, recyclables and garden waste) will arrive in enclosed Refuse Collection Vehicles.

Any incidents of non-conformance will be recorded in the Non-Permitted Waste Form EMS-FR-01 and corrective action taken.

2.3 Overview of Waste Processing

The site layout is shown on Drawing No WAW-PY-LAY-01. The waste codes set out in Table 1 provide the main list of waste to be accepted and assigns a risk category for odour.

The waste processing activities will be straightforward storage and transfer.

Table 1 –Wastes Typically Accepted at the Site

EWC Code	Description	Comments	Risk of Odour
15 01 01	Paper and Cardboard	These wastes may be from separately collected municipal packaging waste sources.	Low
15 01 02	Plastic packaging		Low-Medium
15 01 03	Wooden packaging		Low
15 01 04	Metallic packaging		Low-Medium
15 01 05	Composite packaging		Low-Medium
15 01 06	Mixed packaging		Low-Medium
15 01 07	Glass packaging		Low-Medium
15 01 09	Textile packaging		Low
20 01 01	Paper and cardboard		Unlikely to be accepted as single waste stream. These wastes are collected as mixed dry recycling.
20 01 02	Glass	Low-Medium	
20 01 10	Clothes	Low	
20 01 11	Textiles	Low	
20 01 38	Wood	Unlikely to be accepted as single waste stream.	



Odour Management Plan

Document Reference EMS-OP-04

Issue Number: 3

Issue Date: 24.6.2024

20 01 39	Plastics	Unlikely to be accepted as single waste stream. These wastes are collected as mixed dry recycling.	Low-Medium
20 01 40	Metals		Low
20 02 01	Biodegradable waste	This includes garden waste	High risk if accepted waste is wet and aged.
20 03 01	Mixed Municipal Waste	This includes black bag and mixed dry recyclables	Low-Medium risk of odour
20 03 02	Waste from Markets	(This would not include food waste)	Low-Medium risk of odour
20 03 07	Bulky Waste	This would include collections from houses or businesses as whole items. For example, furniture and soft furnishings (that may contain POPs).	Low

WAW has operated a waste transfer station from the site since June 2021. It also uses part of the site as its HGV operating centre.

There is an existing building on site which has been divided into two operational areas. The southern half is used for vehicle maintenance and provides the workshop. This has its own roller shutter doors and operates separate to the Waste Transfer Station (WTS).

The WTS is inside the northern part of the building. It has been set out with internal storage bays to receive waste. There is a loading bay at the northern end of the building, which is used to load articulated vehicles fully inside the building.

There is a roller shutter door for the waste reception operation, and a separate roller shutter door for the loading bay.

The entire operational area is concreted.

WAW is currently contracted with Basildon Borough Council and Castle Point Borough Council to provide waste reception, bulking and transfer for their kerbside collected waste and recycling materials.

There may be other Waste Collection Authorities utilising the site in the future, as well as other commercial users, generating similar wastes.

Local Authority collected garden waste is also transferred through the Basildon depot.

Persistent Organic Pollutants (POPs) may be found in soft furnishings (sofas, sofa beds, chairs, stools, futons and beanbags). From the 1 January 2023, these wastes were no longer permitted to be sent to landfill. As a result, local authorities collecting these wastes through their bulky waste collection service, required temporary storage sites, pending transfer to an authorised facility. The WAW facility provides a separate, secure storage for this waste stream to assist local authorities.

Waste Treatment and Storage

No treatment of waste will take place at the site. There is no fixed plant at the site.



Odour Management Plan

Document Reference EMS-OP-04

Issue Number: 3

Issue Date: 24.6.2024

All waste will be received, stored and transferred inside the building. A mobile plant will be used to rotate waste in the storage bays and load the waste.

The internal layout includes 6 storage bays. The bays on site are numbered and are used for specific waste streams.

Bays 1 and 2 will be used to receive mixed black bag waste on a batch process. Whilst one bay is being emptied, the other bay will be used to receive waste. Bays 3 and 4 will be used to manage the dry recyclables and garden waste respectively. Bay 5 will be used to store POPs. Bay 6 will be used as an emergency store only.

WAW operates a fleet of articulated lorries. A constant flow of bulk vehicles is planned to attend the WTS throughout each day to ensure that waste in all bays is maintained at such a level as to ensure that it is removed within 24 hours of arrival.

An articulated lorry will reverse into the loading bay. The waste will be loaded directly into the lorry from inside the building.

The waste will be loaded on a first in – first out principle. For the black bag waste, the operations use 2 bays on a batched process. Whilst one bay is being emptied, the second bay is used for storage. This rotation allows a bay to be emptied and cleaned prior to receiving more waste.

The annual permitted throughput of the facility will be 120,000 tonnes.

The storage limits for the site are set out in Table 2.

Waste Dispatch

Waste is removed from the site daily. Typically, 15 bulk haulage lorries export waste per day.



Odour Management Plan


Document Reference EMS-OP-04

Issue Number: 3

Issue Date: 24.6.2024

Table 2 –Storage Limits

Waste Type	Storage Area	Max. Height	Max. Volume	Notes
Bay 1 (black bag)	18.5m x 7m 129.5m ²	4m	230m ³	The waste is loaded out daily.
Bay 2 (black bag)	18.5m x 7m 129.5m ²	4m	230m ³	The waste is loaded out daily.
Bay 3 (dry recyclables)	7m x 9m 63m ²	3m	95m ³	The waste is loaded out daily.
Bay 4 (Green Waste)	7m x 9m 63m ²	3m	95m ³	The waste is loaded out daily.
Bay 5 (POPs)	6.5m x 9m 58.5m ²	3m	88m ³	This is a recent provision to assist local authorities deal with changes for dealing with soft furnishings (EWC 200307). Waste is loaded out daily.
Bay 6 (Spare – Overflow)	8m x 4m 32m ²	3m	48m ³	This is used only as a contingency overflow for specific loads. Waste is loaded out as a priority.
Quarantine x2	2m x 2m 4m ²	2m	8m ³	Cages

	<h1>Odour Management Plan</h1>	
Document Reference EMS-OP-04	Issue Number: 3	Issue Date: 24.6.2024

3 Odour Management

3.1 Responsibility for Implementation of the Odour Management Plan

The Technically Competent Manager (TCM) has responsibility for ensuring these procedures are adhered to which includes communication with staff and contractors, and the provision of adequate training.

The Technically Competent Manager is responsible for updating and re-issuing these procedures as necessary and ensuring all staff are trained in new procedures. The TCM will be the main point of contact for ensuring implementation of this plan. In their absence, the Site Supervisor will be responsible for implementation.

All staff will be trained in these procedures. Staff training is set out in EMS-OP-01. All staff will be trained to a standard which enables them to perform the responsibilities. The TCM is responsible for delivering training and maintaining records. Training is reviewed on an annual basis.

A record of staff training will be kept for each staff member which includes inductions to new processes and procedures as needed. EMS-FR-03.

If there are any changes to the operation which affect the odour management at the site, the TCM will carry out revised training and update the Management Plan accordingly.

The OMP will be reviewed on an annual basis or sooner if requested by the EA. It will also be updated if the operator changes the operation.

The Odour Management Plan identifies the potential sources, pathways and receptors that may be sensitive to odour.

3.2 Source

Table 1 provides the list of wastes that may be accepted at the site. By its nature, black bag waste has the potential to be odorous. However, the local authority collects the household waste in bags, which reduces the likelihood of odour risk to medium.

The mixed dry recycling has a low odour potential. This waste is also collected in bags.

The site does not receive food waste. The local authorities provide a separate food waste collection, which will help to divert this waste from the black bag waste, but in any event food waste is not handled at this site.

The garden waste has the potential to be odorous, if it is aged and wet. The waste collection authorities provide sacks or wheeled bins for garden waste which helps to keep the waste dry. The collection service is fortnightly and there is a quick turnaround of the garden waste at the site, which reduces the likelihood of odour risk to medium.



Odour Management Plan

Document Reference EMS-OP-04

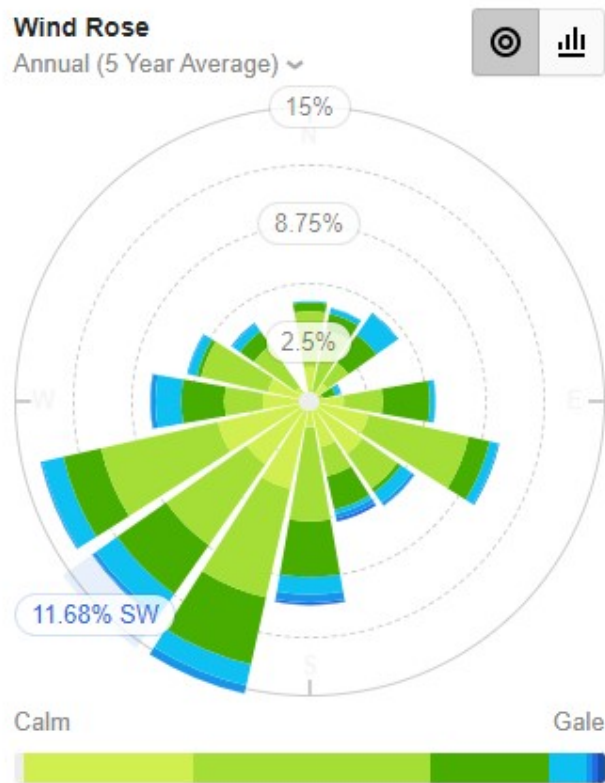
Issue Number: 3

Issue Date: 24.6.2024

3.3 Pathway

The pathway for odour will be the atmosphere. The prevailing wind in this location is the south westerly. Figure 1 provides the wind rose for the locality.

Figure 1 – Wind Rose Data (for Southend Airport)¹



3.4 Receptors

Figure 2 shows the site and broad location of the main receptors within 1km. Table 3 provides a description of those receptors and the distance and direction from the site. The distance has been measured from the permit boundary, at the closest point.

¹ <https://wind.willyweather.co.uk/ee/essex/london-southend-airport.html>

Figure 2 - Site Setting and Receptors (The permitted site is shown with a green boundary) Blue shows 1km radius from centre point of site.

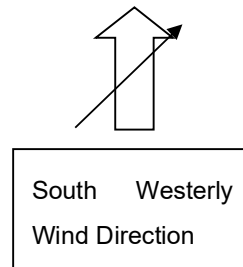



Table 3 – Receptors

Receptor	Legend	Type	Sensitivity to Odour	Distance and Direction from Permitted site
A127	A127	Road	Low	460m North
Sewage Treatment Works	IND1	Industrial	Low	230m North West
Waste MBT Site	IND2	Industrial - disused	Low	120m North East
Burnt Mills Industrial Estate	IND3	Industrial	Low	Immediately West
Burnt Mills Industrial Estate	IND4	Industrial	Low	Immediately East
Burnt Mills Road	RES1	Residential	High	315m South
E Mayne	RES2	Residential	High	680m North West
Hovefields Avenue	RES3	Residential	High	660m North East
Hovefields Park	RES4	Residential	High	225m North East
Nevendon Bushes	Park	Local Nature Reserve	Low	630m South West
Rushley Park	Park	Recreational	Low	510m South East
Northlands Park Nursery / Felmore Primary School	SCH	School	High	660m South West
Sainsbury	RET1	Supermarket	Medium	790m North West
Priority Habitat - Woodland	PH	Ecology	Low	175m North West
Priority Habitat - Coastal and floodplain grazing marsh / Proposed Local Wildlife Site*		Ecology	Low	30m north of site entrance



Odour Management Plan

Document Reference: EMS OP 04

Issue Number: 3

Issue Date: 24.6.2024

3.5 Assessment

All waste will be received, stored and transferred in a building.

The building is fully enclosed with steel clad sides and roof. There are two roller shutter doors used to enter the building.

There is a loading bay at the northern end of the building, which is used to load articulated vehicles fully inside the building.

There is a roller shutter door for the waste reception operation, and a separate roller shutter door for the loading bay.

The site receives municipal waste from local authority collection rounds. The residual waste (black bag) is received in bags and unloaded into a dedicated bay.

The mixed dry recycling is also received in bags and unloaded into a dedicated bay.

Garden waste is received either loose or in bags and is unloaded into a separate bay.

All waste is received on the same day that it is collected.

The bulky waste that may contain POPs, includes soft furnishings such as sofas and chairs. These are not odorous. If the site has no requirement to store POPs, this bay may be used for storing dry recyclables.

WAW operates a fleet of articulated lorries. A constant flow of bulk vehicles is planned to attend the site throughout each day to ensure that waste in all bays is maintained at such a level as to ensure that it is removed within 24 hours of arrival.

The waste will be loaded on a first in – first out principle.

For residual waste, there are two bays. Whilst one bay is being emptied, the other bay is being filled. This rotation allows a bay to be emptied and cleaned prior to receiving more waste.

The recycling waste and garden waste have single bays. Once the collection round has been completed, WAW will arrange for the bays to be emptied, in preparation for the next day deliveries. Bays may be interchangeable to respond to market conditions. However, all storage controls will remain applicable regardless of the contents on any given day.

The operation has continued for 2 years and WAW has good knowledge regarding the frequency of deliveries and volume of waste anticipated.

During peak season, there may be more garden waste delivered. WAW will increase the frequency of dispatch, to maintain the storage capacity.

As part of good housekeeping the receiving waste bay will be cleaned each time it is empty.

No waste that has a high potential to generate odour will be left on site for longer than 48 hours maximum. Most of the waste is removed the same day or within 24 hours.



Odour Management Plan

Document Reference: EMS OP 04

Issue Number: 3

Issue Date: 24.6.2024

In the absence of a likely source of odour, the nature of the operations combined with the distance and direction of the nearest receptors, the risk associated with odour is low.



Odour Management Plan

Document Reference: EMS OP 04

Issue Number: 3

Issue Date: 24.6.2024

Odorous and potentially odorous process / material	Control measures (Appropriate Measure / BAT)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level	Action taken if outside optimum process parameters
All waste stored in Bays inside the transfer station.	All bays are operated on a first in – first out principle. The residual waste will be stored in two bays operated on a batch system. As bay 1 is being emptied, bay 2 will be used to receive waste.	Constant. Site operatives based at the site will notify the Site Manager and TCM if odour is detected outside the building.	Visual checks. The site manager carries out daily checks. Once the daily deliveries have ceased (these are typically local authority collections), arrangements are made to empty all the waste bays. The residual waste in bays 1 and 2 will be removed on a continuous basis throughout the day on a rotation basis.	Bay 1 is full and not being emptied and Bay 2 is half full.	The machine operator will monitor the waste levels throughout the day. This is an unlikely scenario as the operator has a fleet of HGVs to bulk transfer the waste from the site. Arrangements will be made when Bay 1 is 75% full, rather than at 100% capacity. In the event of any delay to this procedure, the spare bay can be used to provide additional capacity.



Odour Management Plan

Document Reference: EMS OP 04

Issue Number: 3

Issue Date: 24.6.2024

3.6 Mitigation

The following procedures will reduce odour emissions at the site.

The roller shutter door for the loading bay will be kept closed. The roller shutter door will only be opened to allow a vehicle to enter/leave during waste transfer.

Whilst there may be 40 deliveries per day, these are spread across the working day. The waste accepted as the Waste Collection Authorities delivering the waste provide separate kerbside food waste collection. This reduces the biodegradable content of the residual waste. The residual waste is also stored furthest from the door.

The WTS is co-located with the fleet operating centre and operations control centre. The WTS receives a steady, commensurate flow of bulk collection vehicles sufficient to respond to inbound demand.

Once all collection rounds have been completed, the roller shutter door to the waste transfer storage bays will be closed. It will be opened only to receive any late deliveries or other vehicles delivering commercial waste.

The storage bays will be cleaned when empty. This typically takes place every 2 days.

If any odorous waste is identified, it will be placed into the residual waste bay that is due to be emptied first. It will be covered with other bagged waste. The machine driver will be notified to load this waste first.

The household waste from the Waste Collection Authorities is very consistent and the site does not encounter any abnormally odorous deliveries.

There are no commercial waste inputs. The site has operated since June 2021 and the waste input has been consistent. If any delivery was abnormally odorous, arrangements would be made to load it first out, within an hour.

During warmer weather conditions, when waste can generate more odour, WAW will increase the frequency of transfer, removing any potential source of odour.

There is no air ventilation system. Staff do not routinely enter the building. The only staff working inside the building include the loading shovel operative, who will be in a climate-controlled cabin.

3.7 Contingency

There may be occasions when unforeseen circumstances may increase the risk of odour, such as accidents, emergencies and other abnormal events. It must be noted that these events would be infrequent and unlikely, given all the controls in place on site to prevent such incidents occurring. For example, staff training, plant maintenance, daily checks.

The waste delivered to the site is from Local Authority contracts. Therefore the frequency of deliveries is set for each week and the nature of the waste being received is well established.

For the residual waste, the site will operate two storage bays. These are alternated to



Odour Management Plan

Document Reference: EMS OP 04

Issue Number: 3

Issue Date: 24.6.2024

ensure capacity is maintained. As one bay is being emptied, the other can be used for receiving new loads. The waste is loaded out on a first in – first out principle.

The site has a fleet of HGVs for removing bulk loads of the waste. The operator has qualified HGV drivers, with 25 being based at this site. The operator also has the following staff based at site.

- Qualified HGV Fitters x3
- Trainee HGV Fitter x1
- Tyre fitter x1
- Yard operatives x3
- Security x2
- Office staff x2
- Transport manager x1
- Vehicle schedulers x2

All these roles are provided to ensure that the transport management is effective and efficient. There is a workshop on site to carry out maintenance and repairs. This ensures that all mobile plant and road vehicles are maintained to a high standard and remain available for use.

Contingency and Action plans are provided in Table 4.



Odour Management Plan

Document Reference: EMS OP 04

Issue Number: 3

Issue Date: 24.6.2024

Table 4 – Abnormal Events and Action Plan

Event	Prevention	Action if Occurred (Short Term)	Long Term Action
Equipment breakdown leading to increased stockpiles and odour.	Daily checks of all equipment. Low equipment use on the site. On site workshop and maintenance team.	If equipment cannot be replaced or repaired, the operator may re-deploy plant from another site or divert the waste to another site. Waste-A-Way has other operational sites in Burnt Mills Industrial Estate.	Review Plant Preventative Maintenance Programme. Review staffing requirements to make sure that maintenance staff are available and fully trained.
Power Failure	Daily checks and on-site workshop with maintenance engineers.	The operation does not require power for equipment. It is a straightforward storage and transfer operation.	None required. Keep under review if position changes.
Incidents on local roads preventing waste being removed from the site.	This is out of the control of the operator. The operator monitors local road conditions as part of their transport planning.	If waste vehicles cannot leave the site, it is likely that waste vehicles cannot deliver waste. Any waste will be loaded into a vehicle, which is sealed. Once the road network has been re-opened, the waste will be removed. Any waste in the storage bay will be rotated. It is likely that this event would stall operations for no longer than 24 hours, which is the normal turnaround time for the waste.	None required.
Accidents involving site based plant or road vehicles within the site, preventing waste being removed from the site.	Only qualified and fully trained staff to use site based plant and road vehicles.	Site management to investigate cause of the accident and to implement H&S assessment first as a priority. Depending on the damage to site-based	Full review of incident and investigation results. In-house investigation to be audited by third party and corrective measures implemented and



Odour Management Plan

Document Reference: EMS OP 04

Issue Number: 3

Issue Date: 24.6.2024

Event	Prevention	Action if Occurred (Short Term)	Long Term Action
	<p>One-system through site prevents lots of manoeuvring vehicles.</p> <p>Low plant use for the operation.</p> <p>Site has fleet of HGVs to use.</p>	<p>plant, the vehicle will be repaired on site or replaced. During the interim period an alternative machine will be hired or redeployed.</p> <p>For road vehicles, the operator has a fleet of vehicles to continue operations.</p>	<p>incorporated into management systems.</p>
Staff shortages	<p>Training of staff on multiple sites and multi-disciplined allows staff to be redeployed to cover any holidays, sickness and any other absences.</p>	<p>Staff will be redeployed to cover any staff shortages. Agency staff can also be used. The operator has agreements in place with Employment Agencies.</p>	<p>Review staffing requirements on a regular basis. Implement refresher training for all relevant staff.</p> <p>All holiday must be pre-booked with senior management to avoid “clashing” with other staff.</p>
Fire	<p>See Fire Prevention Plan</p>	<p>After any incident involving a fire, the site management will remove waste from the site and carry out full investigation. Waste operations to commence only if all site infrastructure is in place in accordance with permit and management system.</p>	<p>Any such incident will require a full investigation and review of the Fire Prevention Plan. Any recommendations from the Fire Service and other changes will be agreed with the Environment Agency.</p>
Waste limits reached in storage bays (applies to all bays)	<p>Site has fleet of HGVs which can be deployed at short notice to maintain capacity.</p>	<p>If the storage limit is reached in any of the waste bays, arrangements will be made to empty the bay. The spare bay will be used to provide interim storage.</p>	<p>The site receives local authority collected waste which has defined collection routes/days. Therefore, the deliveries are</p>



Odour Management Plan

Document Reference: EMS OP 04

Issue Number: 3

Issue Date: 24.6.2024

Event	Prevention	Action if Occurred (Short Term)	Long Term Action
	<p>Loading plant and HGVs subject to regular maintenance. There is a workshop on site with trained mechanics.</p> <p>Daily checks.</p>		<p>routine and regular. The operator has clear understanding on the delivery pattern and can make sure that additional controls are in place to respond to specific events. For example, increased green waste collections in the summer will require removal more frequently.</p>
<p>Very odorous waste encountered.</p>	<p>Waste is from approved Waste Collection Authority contracts and is consistent in nature. No commercial waste accepted.</p>	<p>In the event of any odorous waste being identified, the operator would arrange for a bulk transfer vehicle to attend, collect and remove that waste within 1 hour. They are able to provide this assurance as all bulk vehicles are within their control; they do not use any third-party hauliers.</p>	<p>Inform Waste Collection Authorities to instigate further education and notification to residents about waste collection.</p>



Odour Management Plan

Document Reference: EMS OP 04

Issue Number: 3

Issue Date: 24.06.2024

4 Odour Reporting

4.1 Complaints

The Site Manager has the overall responsibility for this procedure.

The administration staff will all be responsible for handling complaints and recording on the correct form, see Appendix A. All complaints must be referred to the Site Manager.

In this context, a complaint may be received directly from a resident, customer, local business or from a Regulator.

When the site receives a complaint, a record will be summarised in the Site Diary.

All staff based in the office will be trained on recording complaints and to make sure they notify the TCM immediately.

The TCM will visit the site and carry out a sniff test at the permit boundary and will attend the site of the complainant/reporter, if known.

It is recognised that there may have been an odour release caused by one event, rather than a prolonged release. Therefore, odour may not be detected during the reactive monitoring.

The TCM will review the activities that may have given rise to the complaint. The site is covered by CCTV and the TCM will cross check the footage with the time of the odour report. This will allow the TCM to observe any specific activities on site that may have caused the odour release. Other actions will include:

- Review of site diary and check for any unusual regional weather events occurring during the day on which the complaint was made.
- Review site diary and establish what site activities were taking place at the time the complaint even occurred.
- Review waste types accepted that day.
- Identify whether there were any other activities in the area taking place that could have generated odour e.g. Basildon Seage Treatment Works.
- If it is established that the emissions were attributable to activities being undertaken at the site, as necessary review the relevant operational procedures and implement improvements and provide additional training to site.

The Environment Agency will be notified within 24 hours of receiving a substantiated odour complaint, with the follow up investigation outcome and actions taken provided within 48 hours.



Odour Management Plan

Document Reference: EMS OP 04

Issue Number: 3

Issue Date: 24.06.2024

The Site Manager will report the findings to every complainant and implement appropriate corrective action in accordance with a specific management plan or the Operational Procedures.

The TCM will aim to provide feedback to each complainant within 48 hours of receiving the complaint.

The TCM will report all findings to the senior management team at the monthly meeting, or sooner if the complaint findings require urgent intervention.

If the site receives several substantiated complaints, the operator will assess the site operations and consider the use of deodorisers. This OMP will be updated accordingly and submitted to the EA. A substantiated complaint is one where the TCM has visited the complainant and confirmed that odour is being released from site activities.

4.2 Engagement with the Community

The immediate neighbours will be contacted, and direct dial telephone details provided for the TCM and main officer number. Email contact details will also be provided.

The operator has operated from this site for many years. They are established on the estate and know their immediate neighbours.

All HGVS entering the site will be recognisable with Local Authority/company branding. Local businesses and residents can contact the site office and raise any concerns with the site operations and drivers.

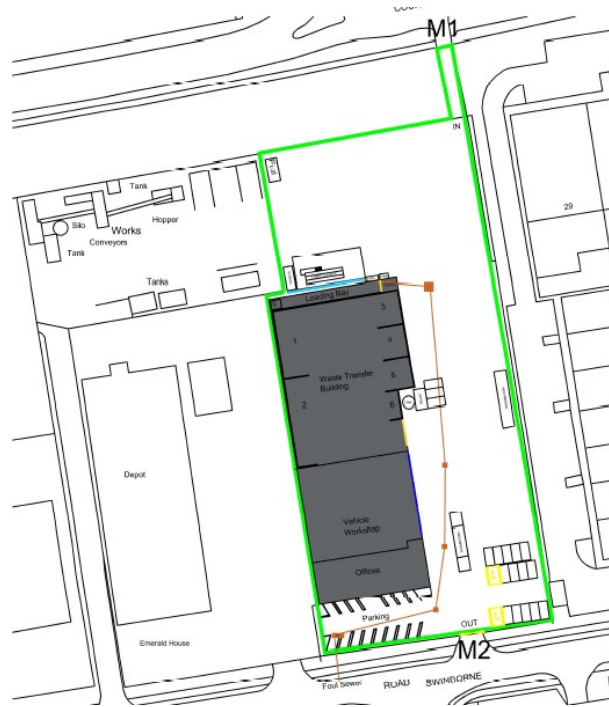
4.3 Pro-Active Monitoring

As part of the daily checks, site staff check the perimeter of the site twice a day. As part of this, the staff will check if odour is being generated and leaving the site. This will be conducted as a sniff test. M1 is located downwind of the waste transfer building. M2 is located at the southern end of the site. These are shown on Figure 3.

In addition, whilst WTS staff have prime responsibility for ensuring that all nuisance risks are mitigated by way of accelerated provision of collection vehicles, the WTS is co-located with the HGV operating centre, the main HGV workshops, and head office functions. These non-operational teams ensure that any site odour is quickly identified and reported.

If odorous waste is detected, the operator's fleet scheduling team located on site will respond to urgent requests for prompt collections.

Figure 3 – Location of Monitoring Points



If the Site Manager detects odour, a record will be made in the site diary with the following information:

- Date/Time
- Location
- Nature of Odour

If the nature of the odour has been caused by a staff action, the Site Manager will carry out further training to prevent a repeat incident. If the odour is being caused by an external source, this will be noted in the site diary.

A record will be made of any incident, complaint and corrective action.

The complaint procedure set out in the EMS will be implemented in the event of an odour complaint being received.

The controls set out are sufficiently robust to manage any odorous waste and prevent any harm to the local amenity.

A review of this Plan will be carried within 12 months as this will allow the operator to fully commission the treatment process and identify whether further controls are required.



Odour Management Plan

Document Reference: EMS OP 04

Issue Number: 3

Issue Date: 24.06.2024

In addition, if odour complaints are received, this plan will be reviewed. Additional mitigation measures can be implemented. Such measures could include providing a deodoriser.

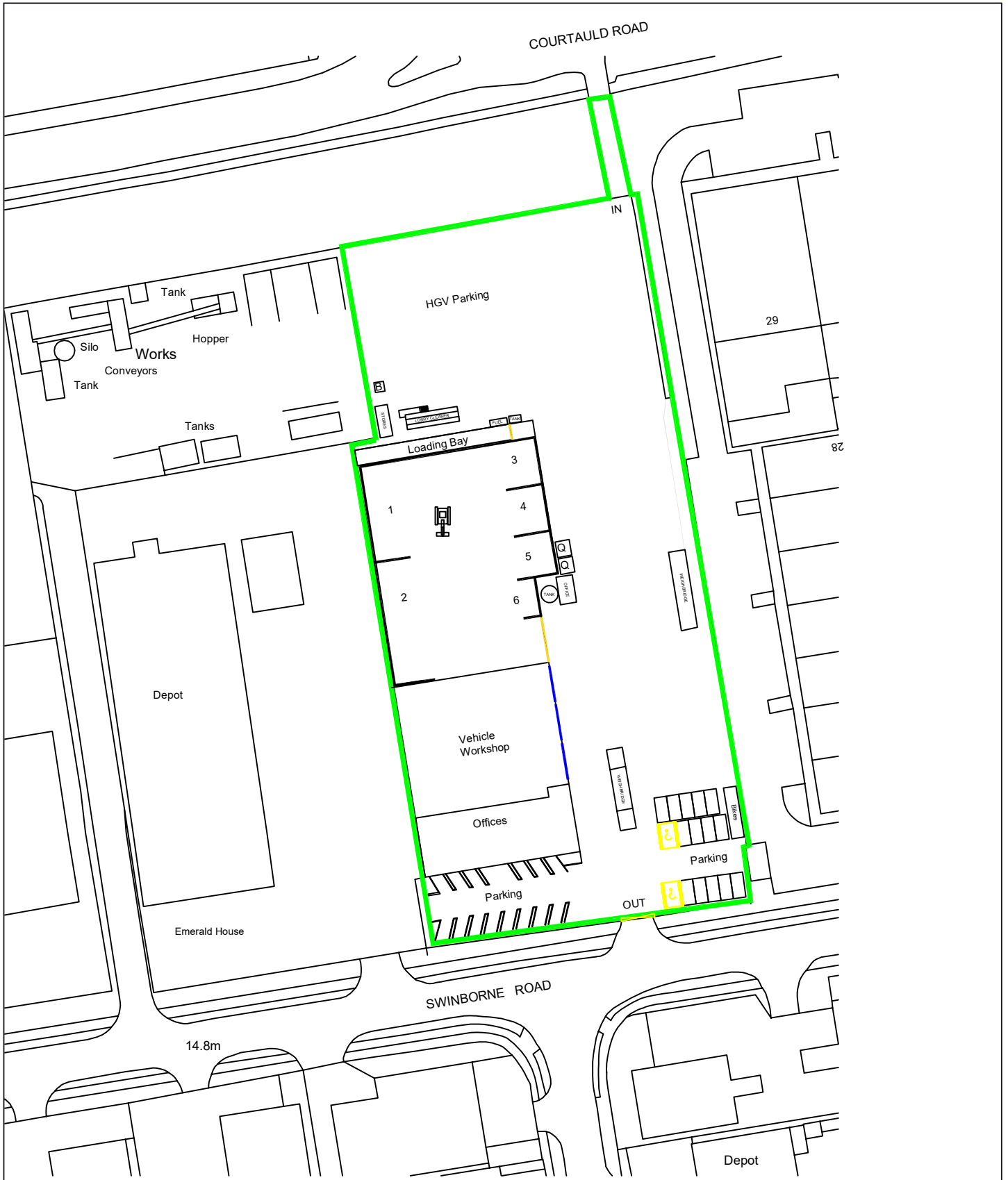
Since operations commenced, there have been no odour complaints received.

4.4 Reactive Odour Monitoring


If odour is reported to the operator, the procedure set out in the complaints section will be implemented.

APPENDIX A – COMPLAINT FORM

Complainant Details	
Complainant Name -	
Address –	
Postcode -	
Tel -	
Email -	
Date -	
Complaint Ref Number -	
Complaint Details -	
Investigation Details	
Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Weather conditions -	
Wind direction and speed -	
Investigation findings -	
Feedback given to Environment Agency and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	
Review and Improve	
Improvements needed to prevent a reoccurrence -	
Proposed date for completion of the improvements -	
Actual date for completion -	
If different insert reason for delay -	
Does the dust management plan need to be updated -	
Date that the dust management plan was updated -	
Closure	
Site manager review date	
Site manager signature to confirm no further action required	



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<p>Q Waste Quarantine Area</p> <p>B Battery Box</p> <p>— Roller Shutter Door Workshop</p> <p>— Roller Shutter Door WTS</p>	<p>1 Residual Waste</p> <p>2 Residual Waste</p> <p>3 Mixed Dry Recycling</p> <p>4 Garden Waste</p> <p>5 POPs</p> <p>6 Spare - overflow</p> <p>Bays will be interchangeable depending on market needs, but all controls will remain the same.</p>	<p>Entire Site is Concreted</p> <p>Prevailing Wind from South West</p>	
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