Recycling and recovery UK

Southend-on-Sea Environmental Services Depot

2.1 Odour Management Plan

December 2025

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DOCUMENT DETAILS

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DOCUMENT REVIEW HISTORY

Date	Version	Description
January 2025	Version 1.0	Original Document to support environmental permit transfer to SUEZ Recycling & Recovery UK for the Refuse Transfer Station.
December 2025	Version 2.0	Amendments to support an application to vary the environmental permit to regularise acceptance of hazardous waste, increase permitted annual throughput and update permit to modern conditions.

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APPENDICES

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1 INTRODUCTION

1.1 This document details the Odour Management Plan (OMP) for the Southend-on-Sea Environmental Services Depot (the site) is located at Southend-on-Sea Central Cleansing Depot, Eastern Avenue, Southend-on-Sea, Essex, SS2 5QX at National Grid Reference (NGR) TQ 88143 87496. The site location and permit boundary are presented in Figure 1.

1.2 The site holds an Environmental Permit (permit) with the reference EPR/DB3402TF. The site operates as a Refuse Transfer Station (RTS) with physical treatment and a clinical waste transfer station. SUEZ operate the site on behalf of Southend-on-Sea City Council. Details of the site's activities are included in the Section 2 of this document.

1.3 All SUEZ operations are certified to ISO 14001, ISO 9001 and ISO 45001 and operate under documented management procedures. All SUEZ operations are controlled by an Integrated Management System (IMS) as described in the Operations and Emissions Management Plan (Document reference 1.2 of the site's management system).

1.4 The OMP is to be reviewed as a minimum on an annual frequency by the Site Manager and the Environment and Industrial Risk (EIR) Manager to ensure it reflects the latest guidance, legislation and the site operations. As a minimum the OMP will be reviewed after a change of operations or after an environmental issue and following an accident on site or receipt of a complaint.

1.5 This OMP is a working document, intended to be used as a reference document for operational staff on a day-to-day basis. SUEZ will implement the plan to ensure that all reasonable measures are taken to control odour emissions. If an adverse impact is identified, prompt action will be taken to identify the source and apply corrective measures. It provides a schedule of actions that will be taken to minimise odour impact and details site management procedures for the management and monitoring of odour.

1.6 The OMP has been prepared in accordance with the following guidance document:

- H4 – Odour Management Guidance.

1.7 The OMP will adopt a Source → Pathway → Receptor model with an emphasis on implementing effective and robust controls for odour abatement at the earliest stages possible (i.e. at source). The guidance acknowledges that assessment and control of odour can be difficult due to dispersal and the episodic nature of odour events.

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

1.9 This document provides a summary of the physical and management controls that will be employed

to minimise odour release. It provides a site-specific assessment of the potential sources of odour; the pathways odour can take from the site and the receptors it is likely to impact. The document also outlines the control measures including monitoring and contingency actions to be deployed at the site to prevent or minimise odour.

2 DESCRIPTION OF WASTE ACTIVITIES

2.1 General Overview

2.1.1 The site will operate as an RTS with physical treatment and a clinical waste transfer station. The waste acceptance limit for the site is 85,000 tonnes per annum.

2.1.2 The site provides a facility for the storage and 'bulking up' of household residual waste (general waste), food waste, dry mixed recyclables, pre-sorted paper and card, green waste, bulky waste containing POPs and street sweepings collected by Waste Collection Authorities (WCAs), plus residual waste from SUEZ's network of Household Waste and Recycling Centres (HWRCs). The site will also accept waste from third party trade customers.

2.1.3 Non-hazardous and inert waste will be treated as part of the RTS and will consist of manual sorting and separation. In addition, all street sweepings accepted at the site are stored in a designated bay to naturally dewater

2.1.4 The site will accept, store, and 'bulk up' some hazardous waste types including WEEE, waste batteries, chemicals, gas bottles and asbestos.

2.1.5 Clinical waste will be accepted on an ad-hoc basis and will solely derive from households as part of a clinical waste collection service. The waste will comprise offensive waste (e.g. hygiene waste, nappies and incontinence pads) and sharps. Similarly, waste containing asbestos will be accepted on an ad-hoc basis. No more than 50 tonnes of hazardous waste will be stored on site at any one time.

2.1.6 In addition, the site accepts animal carcasses from SUEZ's street cleansing services within Southend-on-Sea. All animal carcasses are stored in a secure freezer prior to being sent to an approved treatment facility elsewhere.

2.2 Permitted Wastes

2.2.1 The waste types permitted to be accepted at the site are detailed in the Operations and Emissions Management Plan (Document reference 1.2 of the site-specific management plan).

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

- Household and commercial waste collected by WCAs including:
  - Household Residual Waste (general waste)
  - Food waste
  - Street sweepings (subject to limited water content)
  - Green waste
  - Dry mixed recycling (containing plastic, paper, card and cans)
- Residual waste from HWRCs
- Bulky waste containing POPs (e.g. domestic upholstered seating)
- Bulky waste (mattresses)

- Fly-tipped waste
- Third party trade commercial waste
- Wood
- Household Offensive Waste
- Clinical waste (sharps only)
- Waste electronic and electrical equipment (WEEE)
- Batteries
- Tyres
- Textiles
- Gas bottles
- Asbestos
- Household chemical waste
- Animal carcasses

2.3 Process Description

2.3.1 Waste is unloaded in distinct areas on site. Visiting traffic is directed via signage and instruction from weighbridge staff.

2.3.2 Waste materials for the site will be delivered in a variety of vehicles. Residual waste from households and third-party trade customers will be delivered in Refuse Collection Vehicles (RCVs) whereas residual waste from SUEZ's network of HWRCs will be delivered in roll-on/roll-off (RO-RO) containers.

2.3.3 Food waste will be delivered by RCV and stillage equipped vehicles.

2.3.4 Street sweepings will be delivered by street cleaning vehicles and roll-on/roll-off (RO-RO) vehicles and will be tipped into a bay where it will naturally dewater prior to onward transport to other processing facilities.

2.3.5 Asbestos waste will be delivered by appropriate vehicle and will be double bagged and stored within a lockable container inside the transfer station building.

2.3.6 WEEE will be delivered to site on a variety of vehicles ranging from small vans to large rigid HGVs. Items will be manually unloaded, or utilising liftings aid where applicable into the designated storage areas.

2.3.7 Offensive waste will be collected in tiger bags and sharps waste will be collected in a sharps box. All offensive waste and sharps waste received at the site will be stored in an enclosed container located outside the transfer station building.

2.3.8 All animal carcasses will be stored in a secure freezer prior to being sent to an approved treatment facility elsewhere.

2.3.9 Waste will either be tipped directly into the bays/stockpiles or waste will be deposited on the hardstanding in front of the relevant storage area where a loading shovel or suitable plant machinery will be operated to move the material into bays, stockpiles or container. For smaller items (e.g. batteries), the waste may be moved into the relevant container manually.

2.3.10 There will be no treatment of hazardous waste, offensive waste or sharps waste on site.

2.3.11 The material in the transfer station building will be removed from the site using the site mobile plant and transferred into bulk haulage vehicles inside the building. Waste materials outside the transfer station building will either be loaded into bulk haulage vehicles (with a loading shovel) in the yard or onto roll-on/roll-off (RO-RO) vehicles. Asbestos, offensive healthcare and waste sharps will be removed from site by appropriate vehicles.

2.3.12 An indicative site layout plan is presented in Figure 2.

3 SOURCE, PATHWAY, RECEPTORS CHARACTERISATION

3.1 Odour Source Inventory

3.1.1 Activities on site are limited to the handling, treatment (manual sorting and separation only), storage and transfer of wastes, therefore the main source of odour considered by this report relate to these activities only.

3.1.2 The following table provides an inventory of all potential odour sources and the odour generating sources at the site.

Table 1 - Odour Source Inventory

Odorous and potentially Odorous Materials	Odour Potential	Maximum time on site	Location on site	Maximum quantity on site at any one time (approx.)	Source and age of waste on arrival
Food Waste **EWC codes** 20 01 08	Medium	24 hours during weekdays or 72 hours over the weekend and bank holiday	In designated bay within the transfer station building equipped with fast acting roller shutter doors as shown on Figure 2.	Approximate stockpile volume - 135m^3 Maximum quantity = 54 tonnes (assumed density factor 0.4)	Municipal waste from Kerbside collection. Up to 1 week old when arriving on site
Road Sweeping Materials **EWC codes** 20 03 03	Low – input materials will vary in composition throughout the year. During the spring and summer months, the materials will largely comprise aggregate, grit and sand. During the autumn and winter months the materials will comprise a larger proportion of organic material (e.g. leaves).	1 month	In designated bay within the transfer station building equipped with fast acting roller shutter doors as shown on Figure 2.	Approximate stockpile volume - 126m^3 Maximum quantity = 50.4 tonnes (assumed density factor 0.4)	Municipal waste from WCA Up to 2 weeks old when arriving on site

General Municipal/ Residual black bag **EWC codes** 20 03 01 20 03 02	Medium	48 hours during weekdays or 72 hours over the weekend and bank holiday	In designated bays within the transfer station building equipped with fast acting roller shutter doors as shown on Figure 2.	Approximate stockpile volume - 378m^3 Maximum quantity = 109.6 tonnes (assumed density factor 0.4)	Municipal waste from Kerbside collection Commercial waste from single source contract Up to 2 weeks old when arriving on site
Green Waste **EWC codes** 20 02 01	Medium	48 hours during weekdays or 72 hours over the weekend and bank holiday	In designated bay within the transfer station building equipped with fast acting roller shutter doors as shown on Figure 2.	Approximate stockpile volume - 360m^3 Maximum quantity = 144 tonnes (assumed density factor 0.4)	Municipal waste from kerbside collection. Up to 2 weeks old when arriving on site
Recyclable, Wastes, Bulky Wastes and Asbestos	The potential for an odour source is negligible and as such is not discussed further in this OMP.				
Offensive and Non-Infectious Healthcare Waste **EWC codes** 18 01 04 18 02 03 20 01 99	Low	1 month	In tiger bags stored in enclosed container outside the transfer station building as shown on Figure 2.	Offensive waste and sharps waste will be stored in the same container and so the volume will be limited to the capacity of the container which is 1m^3	Residential properties Up to 2 weeks old when arriving on site
Clinical waste (Sharps only) **EWC codes** 18 01 01 18 01 03* 18 01 08* 18 01 09	Low	1 month	In sharps boxes stored in enclosed container outside the transfer station building as		Residential properties Clinical waste will be accepted on an ad-hoc basis and so it is not possible to determine the age of

			shown on Figure 2.		the waste when it arrives on site.
Animal Carcasses **EWC codes** 02 01 01 02 02 02 18 02 02* 20 01 99	Low	1 month	In chest freezer located inside portacabin as shown on Figure 2.	Volume will be limited to the capacity of the chest freezer (400 litres)	Roadkill and dead pets collected via Street Cleansing service. Animal carcasses will be accepted on an ad-hoc basis and so it is not possible to determine the age of the waste when it arrives on site.

3.1.3 In addition to the sources listed in Table 1, the site is adjacent to a wastewater and sewage treatment facility (approximate NGR TQ 88043 87526) which may be a potential odour source off site. This particular source falls out of the control of SUEZ's waste operations on site however, any observations of such activities will be noted in the site diary.

3.2 Odour Pathway Characterisation

Overview

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

- Source Related Pathways
- Meteorological Conditions
- Topography

Source Related Pathways

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

Meteorological Conditions

Wind Direction

3.2.3 The main controlling factor in determining the pathway of odour is the ambient meteorological conditions. This is fundamental to the transportation of odour to sensitive receptors.

3.2.4 Wind direction will determine which receptors will be affected and at what frequency. Wind rose from Southend-on-Sea was obtained for the site from meteoblue.com. The data indicates that the prevailing wind direction is from the south west. The windrose is included in Figure 3.

3.2.5 Areas most at risk from an odorous emission, should it occur, are therefore located north east of the site which is a sewage treatment works and industrial estate.

Wind Velocity

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

Air Temperature

3.2.7 Warm air may carry odours upwards by convection for dispersal away from the site. However, warm weather will encourage the onset of biodegradation of exposed or temporarily stored wastes and therefore increase odour potential.

Adverse Weather Conditions

3.1.1 Unusual weather conditions may increase the risk of odour emissions from the site. Site staff will be vigilant to unusual trends in the meteorological data or forecasts which may indicate strong winds or extremes of temperature which may cause a potential problem. The types of weather conditions that may impact on odour generation and emissions and appropriate contingency actions are detailed in Section 5 below.

3.2 Odour Receptor Characterisation

3.2.1 Sensitive receptors within 1km of the site have been identified within Table 2 and are shown in Figure 3.

Table 2 - Sensitive Receptors

No.	Receptor	Category	Distance (m)	Direction from site
1	Farmfoods	Commercial/Industrial	15	West
2	Residential Area	Residential	30	South East
3	Car Wash	Commercial/Industrial	95	West
4	Railway line	Railway Infrastructure	135	West
5	Residential Area	Residential	80	South West
6	Stock Road Industrial Estate	Commercial/Industrial	20	North
7	Victory Sports Ground	Recreational	70	South
8	A1159	Public Highway	10	South
9	Saxon King pub	Commercial	260	North West
10	Anglian Water	Commercial/Industrial	245	North West
11	Sutton Road Cemetery and Crematorium	Public	330	North
12	Temple Farm Industrial Estate	Commercial/Industrial	780	North
13	Warners Bridge Park	Recreational	950	North West
14	Supermarket - Aldi	Commercial	350	North West
15	Fair Havens Hospice	Residential	430	North West
16	Residential Area	Residential	480	North West
17	Saint John Fisher Catholic Church	Public	670	North West
18	Prince Avenue Surgery	Healthcare	750	North West
19	Leigh Cars	Commercial/Industrial	990	North West
20	Earls Hall Parade of Shops	Commercial	740	North West
21	Prittle Brook	Surface Water and migratory route for European Eels	340	West
22	Priory Park	Recreational	235	West
23	Fishing Lake	Surface Water/Recreational	410	South West

24	Children's Play Area	Recreational	590	South West
25	Priory Park Cafe	Commercial	535	West
26	Priory Works Business Park	Commercial/Industrial	310	South West
27	Residential Area	Residential	840	North West
28	Prittlewell Railway Station	Railway Infrastructure	415	South West
29	Euro Car Parts	Commercial	360	South
30	The Railway Tavern (Pub)	Commercial	510	South West
31	St Mary's Prittlewell Primary School	Educational	625	South West
32	St Mary's Prittlewell Parish Church	Educational	690	South West
33	Providence Baptist Church	Public	640	South West
34	Tickfield Industrial Estate	Commercial/Industrial	675	South West
35	Churchill Gardens	Recreational	800	South West
36	Roots Hall Football Stadium	Recreational	860	South West
37	BP petrol station	Commercial	975	South West
38	The Old Waterworks	Recreational	1,000	South West
39	Triumphant Church International	Public	510	South
40	Smash - The Burger Joint	Commercial	575	South
41	One Stop	Commercial	660	South
42	Blake Contractors	Commercial/Industrial	720	South
43	Halfords	Commercial	800	South
44	Residential Area	Residential	415	South East
45	Sutton House Academy	Educational	585	South East
46	Victory Park Academy	Educational	635	South East
47	AJR Plastering	Commercial/Industrial	700	South East
48	Southend Web Services	Commercial	745	South East
49	Cafe	Commercial	965	South East
50	St Luke's Community Hub	Public	1,000	South East

51	Jones Memorial Recreation Ground	Recreational	285	East
52	Southend United Training Ground	Recreational	655	East
53	Waitrose	Commercial	810	East
54	Shell Petrol Station	Commercial	920	East
55	Spire Wellesley GP Surgery	Healthcare	995	East
56	Prittlewell Camp Hillfort	Recreational	935	North East
57	Groundwater (Secondary A)	Groundwater	-	Beneath site

3.2.8 The receptors likely to be most sensitive to an odour nuisance arising from the facility are domestic dwellings or commercial offices. There are no residential properties within 1km of the site that within the direct path of the prevailing wind direction. The closest properties to the site are within a housing estate off the A1159 which is located approximately 30m south east to the site (Receptor 2). In addition, there are residential properties located approximately 80m south west of the site on Ennismore Gardens (Receptor 5). These receptors are not directly in the path of the prevailing wind direction, but it is considered that these residential areas can be affected.

3.2.9 In terms of commercial offices, the nearest commercial properties are located approximately 15m west of the site. Although these receptors are not directly in the path of the prevailing wind direction from the site, there's still a possibility that they may be affected due to their distance from the site.

3.2.10 The nearest commercial properties located north east of the site is industrial/commercial units at the Stock Road Industrial Estate (Receptor 6) located approximately 30m from the site.

4 ROLES AND RESPONSIBILITIES

4.1 Site Management

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

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

4.2 Staff Training

4.2.1 Staff training will be a key aspect of ensuring that odour can be controlled through effective management during daily operations. All site operatives will therefore be trained via basic training and huddle cards to deal with odour management issues. Annual refresher toolbox talks will ensure that the requirements of the OMP are reinforced. Toolbox talks will be delivered by the Senior Site Manager who has received appropriate training.

4.3 Maintenance

4.3.1 SUEZ's Emergency Preparedness and Response procedures provide a clear structure of responsibility which allows operational staff to call in specialist contractors to deal with emergencies and unplanned events which may lead to an odour impact. For occasions when the manager is off site then the nominated deputy will be authorised to take appropriate action.

4.3.2 A list of approved repair contractors will be maintained on the company's intranet and all staff with delegated responsibility should be aware of this list. In line with SUEZ's Policies and Procedures, if a part of the site infrastructure fails and cannot be fixed within 24 hours then a Corrective Action Request (CAR) will be raised on the EcoOnline system (SUEZ's internal logging system).

4.3.3 If maintenance is required on site to prevent odour, then the Environment Agency (EA) will be informed. Repairs will be initiated and completed as soon as possible. SUEZ's IMS checklist include checks on site infrastructure, which will allow preventative maintenance to be carried out.

4.4 Sub-Contractors

4.4.1 All sub-contractors working at, or delivering waste to the site, will be subject to the requirements of the OMP. It is the Senior Site Manager's responsibility to inform sub-contractors of their responsibilities on site. Failure to comply with odour control measures will result in a Notice of Infringement being

issued to the operative and their employer. Further failures to comply may result in that person being banned indefinitely from all SUEZ sites.

5 ODOUR MANAGEMENT AND CONTROL

5.1 Waste Enquiries

5.1.1 Prior to setting up any new contract, the agreed procedures will determine the acceptability of the waste based on the information supplied by the customer. The customer should complete a Waste Enquiry Form (or provide the information in an alternative manner) and return it to the Site Administration team.

5.1.2 Before the waste arrives at site, a copy of the completed Waste Enquiry Form (or alternative information) will be made available to the site so that the Site Manager is aware of and can make provision for any special handling requirements (including odour) as detailed in the form.

5.1.3 A contract request form will be completed by the Sales Co-ordinator and forwarded to the relevant Site Administrator so that a contract can be set up before the waste arrives on site. This ensures the weighing exercise will be very quick to reduce the period of time incoming vehicles spend on site before depositing of waste.

5.1.4 The continued acceptability of all waste contracts will be reviewed annually, or in line with changes to legislation.

5.1.5 As the waste received at the site is via a long-term contract and similar to other contracts within SUEZ, a high level of operator experience is shared in handling the feedstock.

5.2 Waste Acceptance

5.2.1 The site operators will ensure that capacity is available on-site before accepting waste. In particular, if the waste storage area is full, all inbound loads of waste must be diverted until the quantity of waste on site has been reduced. If loads are turned away, then this will be recorded in the site diary.

5.2.2 Only waste types detailed within the environmental permit will be accepted at the site.

5.2.3 Upon arrival, all documentation accompanying the load shall be checked at the weighbridge, and shall include, but not be limited to the Carriers Certificate of Registration and Duty of Care Waste Transfer Note.

5.2.4 Where practicable, the Weighbridge Clerk will complete a visual inspection of each load. The main inspection will be in the reception area. Site staff will visually inspect the waste, as it is unloaded from the vehicles and complete the Waste Acceptance Form.

5.2.5 Wastes that are believed to cause an odour problem will not be accepted at the site. Should the situation occur where a load with wastes that could cause an odour problem is delivered to site, the waste will be immediately placed in an area within the transfer station building and will be prioritised

for removal by the end of the working day. Recording of such information will allow the site to identify any sources of waste which persistently do not meet acceptance requirements enabling remedial action to be taken.

5.3 Waste Storage and Building Enclosure

5.3.1 The primary control of odour on site is that the majority of potentially odorous wastes (including mixed municipal waste, food waste, green waste and street sweepings) will be discharged and stored within the transfer station building that is equipped with fast acting roller shutter doors. An odour suppression system is installed in the transfer station building for the dispersal of odour-neutralising or masking agents as deemed necessary.

5.3.2 The majority of contracted wastes received at site will be a maximum of 2 weeks old arrival at site as the waste is collected on a fortnightly basis (this will only be influenced by the frequency of which a resident places their waste kerbside for collection). Food waste which is collected on a weekly basis and therefore will be a maximum of 1 week old. Animal carcasses and clinical waste will be accepted on an ad-hoc basis and so it is not possible to determine the age of the waste when it arrives on site.

5.3.3 All animal carcasses will be stored in a chest freezer prior to transfer off site. This will halt the decomposition of the carcasses which may give rise to odour emissions.

5.3.4 Offensive waste will be accepted in limited quantities and will be stored in an appropriate container outside the transfer station building.

5.3.5 The majority of the potentially odorous wastes on site will be stored for a maximum of 48 hours (72 hours during bank holiday and over weekends). The maximum storage time for street sweepings, offensive waste and sharps waste is 1 month due to the small quantity received at any one time. The short turnaround time of potentially odorous wastes stored on site will minimise the likelihood of odour to develop.

5.3.6 The monitoring of incoming waste will be recorded as vehicles weigh on and off at the weighbridge. This data will be used to track all inputs and outputs of waste to ensure that the first in first out policy is adhered to and therefore ensure the turnaround period of potentially odorous waste is met. The data will also be used to monitor waste volumes on site and ensure that the amount of potentially odorous waste that is accepted at the site does not exceed the maximum storage limits.

5.3.7 Visual inspections of the waste storage areas will also be undertaken by the Site Manager to ensure that the volume of waste is not exceeded.

5.4 Waste Handling

5.4.1 Material will be delivered and removed from the site as described in Section 2.3 above.

5.4.2 Waste material will be moved in a regular and consistent manner and the site will operate a first in and first out policy on all waste streams to ensure that waste is removed from site as quickly as possible to prevent further degradation and minimise potential generation of odour.

5.5 Housekeeping

5.5.1 The site will be subjected to a good housekeeping regime which assists with the aim of proactive management and associated environmental compliance. Daily inspections will be undertaken at the site via the Daily/Weekly Checklist (Appendix A) or the Vision App (SUEZ's internal logging system). The checklist will be completed by the Site Manager or designated staff and signed off at least weekly by the Technical Competent Manager (TCM) for the site.

5.5.2 In addition, any equipment on site that has been in contact with potential odorous materials will be cleaned as and when deemed necessary.

5.5.3 Potentially odorous waste will be stored within impermeable surface bays inside the transfer station building or outside within appropriate containment (as detailed in Table 1). Any possible spillage will be clean at the earliest opportunity. This will reduce the potential for odour. This will contribute to maintain a clean and organised site. Regular cleaning will be undertaken in the waste storage areas, including floors and bays to ensure the removal of any residues or debris.

5.5.4 The transfer station building benefits with a fully sealed foul drainage system.

5.5.5 In addition to operating a first in and first out policy, the waste storage areas will be regularly emptied to allow it to be cleaned thoroughly.

5.6 Odour Checks

5.6.1 Regular odour checks are carried out to identify any potential odours as detailed in Section 6.2 below. Should any odour be identified, then contingency action shall be followed.

6 ASSESSMENT, REPORTING AND CONTINGENCIES

6.1 Overview

6.1.1 Prevention is viewed as the most effective means of controlling odour before an impact occurs. The Source → Pathway → Receptor model allows for the identification of the critical control points where odour can arise, how it can travel to a receptor and the likely impact.

6.1.2 It is intended that the odour management system will mitigate any potential odour impacts of the activity on the identified receptors. Should complaints be received, procedures will be in place to effectively deal with the issue in a sensitive, efficient and auditable manner.

6.1.3 The controls for each source term are detailed in previous sections of this document. The management of those controls will be based on the on-going monitoring regime at site. The monitoring regime can work as an early warning system to potential problems (e.g. meteorological monitoring) or a diagnostic tool to establish the cause of an odour event (e.g. perimeter monitoring).

6.2 Assessment

Odour checks

6.2.1 The Site Manager will be responsible for ensuring that daily odour inspections are made of the site and its perimeter boundary in order to identify any sources of odour and to establish whether any odours are discernible. Odour checks are recorded on the daily and weekly IMS Checklist or Vision App detailed within the Operations and Emissions Management Plan and included in Appendix A.

6.2.2 However, site management do not solely rely on the odour checks and odour is continually assessed by all staff present on site and any odours identified outside the regular inspections are reported to site management for investigation.

6.2.3 Generally, the site supervisor will carry out the daily odour checks. Any odours identified must be clearly marked on the IMS Checklist or Vision App.

6.2.4 Should a distinct odour be identified during a routine odour check then an investigation on the source of the odour will be undertaken.

6.2.5 Upon identification of an incident or failure of a control measure, then in consultation with the EIR Manager the odour check frequency might be increased to twice daily if necessary.

6.2.6 Should an odour be attributed to the site and the odour sources cannot be resolved within a timely manner then an odour inspection shall be undertaken at key sensitive receptors and recorded on the external odour assessment survey which will clearly indicate whether or not odour was detected.

6.2.7 Should an odour attributed to the site be recorded external to the site as detailed above then an investigation shall be carried out and recorded on the odour assessment form included in Appendix B.

6.2.8 The Site Manager will be informed immediately of any findings of odour attributed to the site and will authorise remedial measures to be taken. Remedial actions may include but be not limited to:

- Checking storage areas to identify the source of the odour to a particular waste.
- Removal of the odorous waste at the earliest opportunity and within 24 hours.
- Cleaning of storage area.
- Use of an odour suppression system for the dispersal of odour-neutralising agents if required.

Odour Assessment

6.2.9 In the event of an odour issue, due to the potential for desensitisation to odours, an odour assessment will be carried out by site personnel who do not work closely with handling waste e.g. office or weighbridge staff. These personnel will be the most suitable to detect any fugitive odour outside the site. Routine odour assessment shall be undertaken, where possible, during hours of waste acceptance and prior to those assessing the odour having entered operational areas where they may be likely to be exposed to odours.

6.2.10 Those undertaking odour assessment should try to avoid where possible strong food or drinks, including coffee, for at least half an hour beforehand and strong scented toiletries and deodorisers in any vehicle used during the assessment. Where possible, the use of perfume sprays, cleaning products etc are avoided within the offices to prevent exposure.

6.2.11 Should staff have been exposed to odours within the facility or any scented products, food or drinks prior to undertaking odour assessment then they may request that the assessment is undertaken by someone else. If this is not possible then the assessor may leave site for a period of time (approximately 15 mins or more) or complete the assessment but ensure that a follow up assessment is carried out after half an hour.

6.2.12 Routine odour assessment should, where possible, be undertaken by staff who have undergone odour acuity assessment to ensure a suitable detection threshold for odours.

6.2.13 Odour assessment is carried out using sniff testing to check ambient air on or off site.

6.2.14 Off-site olfactory assessment will be carried out with reference to the H4 Odour Management Guidance, with an odour assessment form being completed. All site personnel will be responsible for reporting any odour problems immediately to the site manager or the next level of management if the Site Manager is not available.

6.2.15 The form used for odour inspections and assessments is included within Appendix B.

6.2.16 All odour assessments are undertaken using the intensity scale detailed below which is in line with the H4 Odour Management Guidance. This ensures consistency and enables odour assessments taken by Site Management to be compared with odour assessments taken in conjunction with or independently by the EA.

0. None
1. Very Faint
2. Faint
3. Distinct
4. Strong
5. Very Strong
6. Extremely Strong

6.3 Complaints Management and Reporting

Investigation and Records

6.3.1 All complaints and queries received at the facility or via the regulatory bodies including the EA and Local Authority will be logged in accordance with the IMS as soon as practicably possible. Where possible, as much information and detail about the complaint will be recorded, whether this is from the relevant authority or complaint direct to site. All complaints logged will be subject to investigation and complainants responded to as necessary following completion of the investigation. All responses will be through trained and experienced staff.

6.3.2 Complaints management will be undertaken in line with the amenity complaints procedure provided in the IMS. The first stage of complaints investigations is to complete a basic screening exercise to determine if the site is the likely cause and if further, more detailed investigations are required. Once determined that further investigations are needed, an off-site and on-site odour investigations are carried out using the Amenity Complaint Investigation Form included within Appendix C.

6.3.3 Complaints investigations are carried out by site management that are not regularly exposed to the odours and therefore are able to assess the level of odour objectively.

6.3.4 Should a complaint be received out of operational hours, then site management shall try to attend site as soon as possible to carry out an investigation, dependent upon availability.

6.3.5 Where necessary, the EA shall be informed of the investigation findings so they can relay this back to the complainant.

6.3.6 SUEZ will ensure that the complainant has relevant contact details for the site (i.e. the Site Manager). SUEZ will be in regular contact with the complainant and the EA where necessary, whilst any odour issue is being investigated or remediated.

6.3.7 An evaluation of the effectiveness of the techniques used will be carried out on completion of any remedial measures or if the complaints persist. Records of the above will be retained by site for future reference.

Non-Conformances and Complaints

6.3.8 The investigation will determine the source of the complaint and then the cause of the odour.

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

6.3.10 Corrective action procedures are documented in are documented in the IMS procedure titled 'Non-conformance, Corrective and Preventive Actions'. A list of all policies and procedures is included in the Operations and Emissions Management Plan, which forms part of the site-specific management system.

6.3.11 If remediation cannot be completed within 24 hours, then the non-conformance and remedial actions shall be raised on the EcoOnline system.

6.3.12 SUEZ operates an open communication policy with residents and businesses surrounding its sites and will engage with them if deemed necessary.

6.3.13 If necessary, following received complaints, SUEZ will engage and communicate with its neighbours to improve understanding of possible odour issues. This will include detailing the efforts being undertaken to control odour; and importantly the actions being taken in response to their complaints.

6.3.14 Should any problems associated with odour be identified (either by SUEZ or through external sources), SUEZ would engage with those surrounding the site to ensure that they are kept up to date and have means of communicating with SUEZ through an appropriate communications strategy established by the communications team and in agreement with the client. This may include letter drops, visits to the site, open community meetings, social media updates and if appropriate and in agreement with the local residents and political representatives, and if necessary, the establishment of a Community Liaison Group (CLG).

Odour Complaints and Management Review

6.3.15 All complaints will be investigated by the Site Management including but not limited to a review of the number of complaints, weather conditions, investigations and remediation works. If required, the Operations and Emissions Management Plan and OMP shall be updated to reflect any changes made to the management procedures on site following the review.

6.3.16 Site Management and the EIR Manager will review all procedures for the facility as necessary against other SUEZ operations and management procedures as well as industry practice, guidance and legislation to ensure continued best practice is carried out at the facility. Any amendments to practices on site will be reflected in updates of the Operations and Emissions Management Plan and the OMP.

6.3.17 All complaints received by the site are recorded on a tracker spreadsheet by the EIR team. All odour complaints are reported to the EIR Manager and communicated to relevant parties within SUEZ as part of the EIR Department's monthly review.

6.4 Means of Contact

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

6.5 Contingency and Emergency Plans

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

6.6 Abnormal Events

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

Temperature Inversions

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

Storm Conditions

6.6.3 Severe storms may result in disruption to the removal of materials from site. However severe storm conditions are unlikely to be prolonged. Therefore, it is considered unlikely that this will cause a major odour issue on site.

Hot Conditions

6.6.4 There is a greater potential to generate odour during warm weather and therefore an increase in

ambient air temperature may result in increased odour. During prolonged periods of hot weather, olfactory monitoring frequency will be increased and any wastes identified as generating an odour will be prioritised for removal from site.

Implementation of the Contingency Plan and/or Emergency Plan

6.6.5 Wastes that are believed to cause an odour problem will not be accepted at the site. Should the situation occur where a load with wastes that could cause an odour problem is delivered to site, the waste will be immediately placed in a designated bay/s and removed by the end of the working day if received prior to 12noon, or, if received after 12 noon, removed by 12 noon the following morning (excluding Sunday where it will be removed the next permitted day, Monday). A load rejection form will be completed, and a copy of this form will be kept on site.

6.6.6 Should site maintenance be required that would significantly disrupt normal operations and could have the potential to cause an environmental impact (for example during emergency situations), staff will initially inform the site manager who will in turn inform the EA. Site staff will implement measures to store or divert waste as required.

6.6.7 The contingency plan in place at the site is discussed in more details in Table 3 below.

Table 3 - Contingency Plan

ISSUE	POTENTIAL IMPACT ON SITE OPERATIONS	PERIOD	MITIGATION PLAN
Storage capacity full. Site not available as a storage place	This could potentially mean that the site does not have capacity to accept waste for deliveries	1 day	Direct waste to alternative storage area/permitted site.
		Up to 72 hours	As above Risk assess odour generation and impact by increasing Odour Assessment
Storage capacity full due to plant mechanical failure	This could potentially mean that the site does not have capacity to accept waste for deliveries and to transfer waste off site	1 day	Address mechanical failure and/or issues Mobile plant can be hired at short notice from preferred contractor or brought from one of SUEZ's other facilities.
		Up to 48 hours	As above Risk assess odour generation and impact by increasing Odour Assessment

ISSUE	POTENTIAL IMPACT ON SITE OPERATIONS	PERIOD	MITIGATION PLAN
		Up to 72 hours	Direct deliver to alternative storage area Address mechanical failure and/or issues Mobile plant can be hired at short notice from preferred contractor or brought from one of SUEZ's other facilities. Identify alternative long-term storage area/permitted site
Waste removal halted storm conditions / power plant shut down.	Difficulties in removing waste could lead to waste accumulating on site.	1 day	Receive waste and store up to the permit capacity limit and for no-longer than the maximum duration.
		Up to 72 hours	Risk assess odour generation and impact by increasing Odour Assessment Implement medium term solution i.e. transfer to alternative site.

Experience with Contingency/Emergency Situations

6.6.8 SUEZ is experienced in developing contingency plans for other long-term contracts which have worked effectively on previous occasions.

6.6.9 SUEZ has a policy of continuous review of emergency and contingency procedures, and this has allowed experience from these incidents to be used to improve procedures across the operations.

6.6.10 SUEZ experience in operating a significant number of waste facilities, together with managing complex long-term contracts offering similar services, means that SUEZ is able to offer the benefit of experience in and knowledge of logistical planning to ensure that service continues effectively with minimal disruption.

Review and Update of Contingency and Emergency Plans

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

Appendices

Appendix A – Indicative IMS Daily/Weekly Site Inspection Checklist

DAILY INSPECTION (GENERAL)

Facility Name:

Week Commencing:

Recycling and recovery UK

Performance Standard	Hours to Rectify	Inspected Item	Mon	Tue	Wed	Thur	Fri	Sat	Sun	TCM	CAR Ref.
		Inspected By (Initial):									
A1	1	Have there been any Health and Safety issues on site?									
A3	3	Have all open top vehicles leaving the site been netted or sheeted before leaving the loading area?									
A5	72	Have all containers and Suez vehicles which carry Contract Waste got the correct logos in a clean and visible condition?									
A6	3	Has the site closed? If so, was the Contingency Plan followed?									
A9	None	**RTS and MRF only**: Have there been any occaisions when the volume of trade waste on site has prevented Contract Waste being accepted or stored?									
A10/D12	24	Is there enough capacity in all containers, cages and storage bays for Contract Waste until your next collection?									
A10/D12	24	At any point in the last 24 hours has there been insufficient capacity for Contract Waste?									
A11	24	Are all permanent staff wearing uniform with a Suez logo?									
B1/B2/B3/B5/B6/D15	1	Did the Weighbrige Operator complete the Weighbridge Inspection Checklist at the end of the last operational day? If so, were all non-conformances reported to helpdesk?									
C3/C4	3	Have there been any accidents involving a member of the public or any accident classed as 'RIDDOR' of which the helpdesk have not been informed?									
D3	24	Are there sufficient working lights on site to provide the Service? Are those lights fully operable with no flickering and in good condition?									
N/A	N/A	Are all handrails on bays/steps undamaged? Are all containers in good condition?									
D4	24	Does the Site Diary contain the printed name of the person responsible for the site today?									
D6	1	Are all perimeter fences and gates in good condition and is the site secure?									
D8	24	Are all signs in place and in a clean and legible condition? Are all signs presented in accordance with the Traffic and Signage Plan?									
D9	72	Is the Site Diary in place, completed and filled in correctly?									
D11	1	Has there been any failure to follow the HWRC Contract Waste Checking Procedure?									
D13 (1)	1	Have any spillages of Contract Waste presenting a health or safety hazard been cleared promptly?									
D13 (2)	3	Have any spillages of Contract Waste been cleared in accordance with the SOP?									
D14	3	Are fridges and freezers stored in compliance with the SOP and is there adequate capacity until the next collection?									
D16	72	Has there been any unauthorised access to the site, if so, have the consequence been dealt with in accordance with the SOP?									
D17	72	Have all required checks and maintenance for plant and equipment on site been completed?									
D18	24	Are all welfare and toilet facilities available and maintained to the standards required by the SOP?									
D19	24	Has Contract Waste waste been removed or treated in accordance with the Environmental Permit for the site?									
D21	72	Is the facility reasonably free of pests and vermin?									
D22	24	Has any fly tipping or litter within the site or 5m of its boundary been removed?									
D23	24	Has any graffiti or unauthorised notice been removed and the area cleaned/repaired?									
D24	24	Have all Authorised Users been made aware of site rules?									
D25	24	Is all Household Hazardous Waste stored safely and securely and in line with the Environmental Permit?									
D26	3	Are there sufficient staff on site?									
E1	None	Has their been any breach of policies and procedures or Good Industry Practice of which you are aware?									

N/A	N/A	Has there been any attempted private trade entry?									
N/A	N/A	Has the site infrastructure (buildings, fencing, yard, tipping floor walls etc) been inspected and found to be satisfactory?									
N/A	N/A	Are all interceptors in good working condition, free from blockage and with adequate capacity until the next scheduled maitenance?									
N/A	N/A	Has there been any breach of waste acceptance procedures, waste transfer or duty of care procedures?									
N/A	N/A	Are all fuel tanks or other bunded storage vessels in good working order, free of visible leakage and damage?									
N/A	N/A	Is the spill kit available and complete?									
N/A	N/A	Is all emergency and fire fighting equipment available, complete and operable?									
N/A	N/A	**RTS and Landfill only**: Is the odour supression system operating satisfactorily?									
N/A	N/A	Are all systems and procedures for controlling dust, noise and odour in place, operable and complied with?									
N/A	N/A	Are there any issues with fixed or freestanding structures?									

Key: ✓ **Satisfactory; X = Action required; NI = Not Inspected; NA = Not Applicable**

Note: Inspection should be completed daily on days when the facility is operational
If non-compliance is minor and resolved the same day, comments to be recorded on this form, in the Site Diary and Helpdesk.
Otherwise a Corrective Action Request (CAR) can be raised with CAR reference recorded in right hand column.

TCM Attendance (hours):

TCM Signature:

Comments:

Monday	
Tuesday	
Wednesday	
Thursday	
Friday	
Saturday	
Sunday	
Other	

Appendix B – Odour Inspection Form

Odour Investigation - Detailed Assesment Form

To be completed after odour is detected on external assessment form, or following a complaint

ODOUR ASSESSMENT REPORT CAR Ref

Installation Location

Date

Weather

Wind (strength & direction)

Temperature

Bar Pressure (mbar) if known

Ground Condition

General Air Stability (if known)

General Air Quality

Cloud cover

Time Start

Time Finish

Plan attached showing location and extent of odour **Yes / No** (delete as appropriate)

Complaint Received **Yes / No**

Date/Time complaint received

Location of Complaint Area

Number of complaints (related to the same source)

Grid reference (where location is not a property)

Time odour noticed and duration

Test Location	Intensity (0-6)	Extent (0-6)	Severity (0-6)	Offensiveness (0-6)	Sources within facility	External sources

0 - None, 1 -Very Faint, 2 - Faint, 3 - Distinct, 4 - Strong, 5 - Very Strong, 6 - Extremely Strong

Additional Comments

Signed

Persons Contacted Regarding Process

Action Required

Appendix C - Amenity Complaint Investigation Form

Odour Investigation - Detailed Assesment Form

To be completed after odour is detected on external assessment form, or following a complaint

ODOUR ASSESSMENT REPORT CAR Ref

Installation Location

Date

Weather

Wind (strength & direction)

Temperature

Bar Pressure (mbar) if known

Ground Condition

General Air Stability (if known)

General Air Quality

Cloud cover

Time Start

Time Finish

Plan attached showing location and extent of odour **Yes / No** (delete as appropriate)

Complaint Received **Yes / No**

Date/Time complaint received

Location of Complaint Area

Number of complaints (related to the same source)

Grid reference (where location is not a property)

Time odour noticed and duration

Test Location	Intensity (0-6)	Extent (0-6)	Severity (0-6)	Offensiveness (0-6)	Sources within facility	External sources

0 - None, 1 -Very Faint, 2 - Faint, 3 - Distinct, 4 - Strong, 5 - Very Strong, 6 - Extremely Strong

Additional Comments

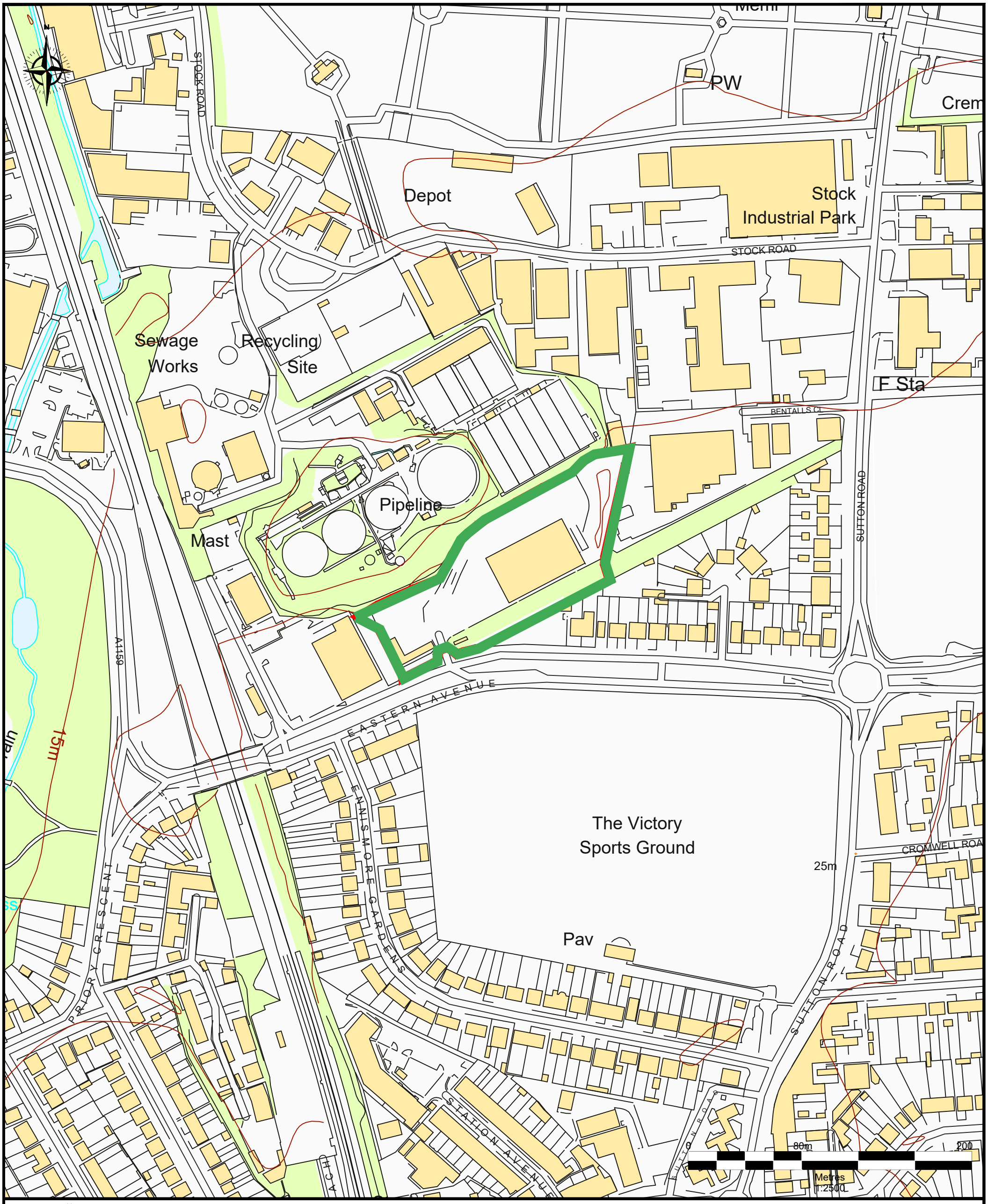
Signed

Persons Contacted Regarding Process

Action Required

Figures

Figure 1 – Site Location Plan



Notes

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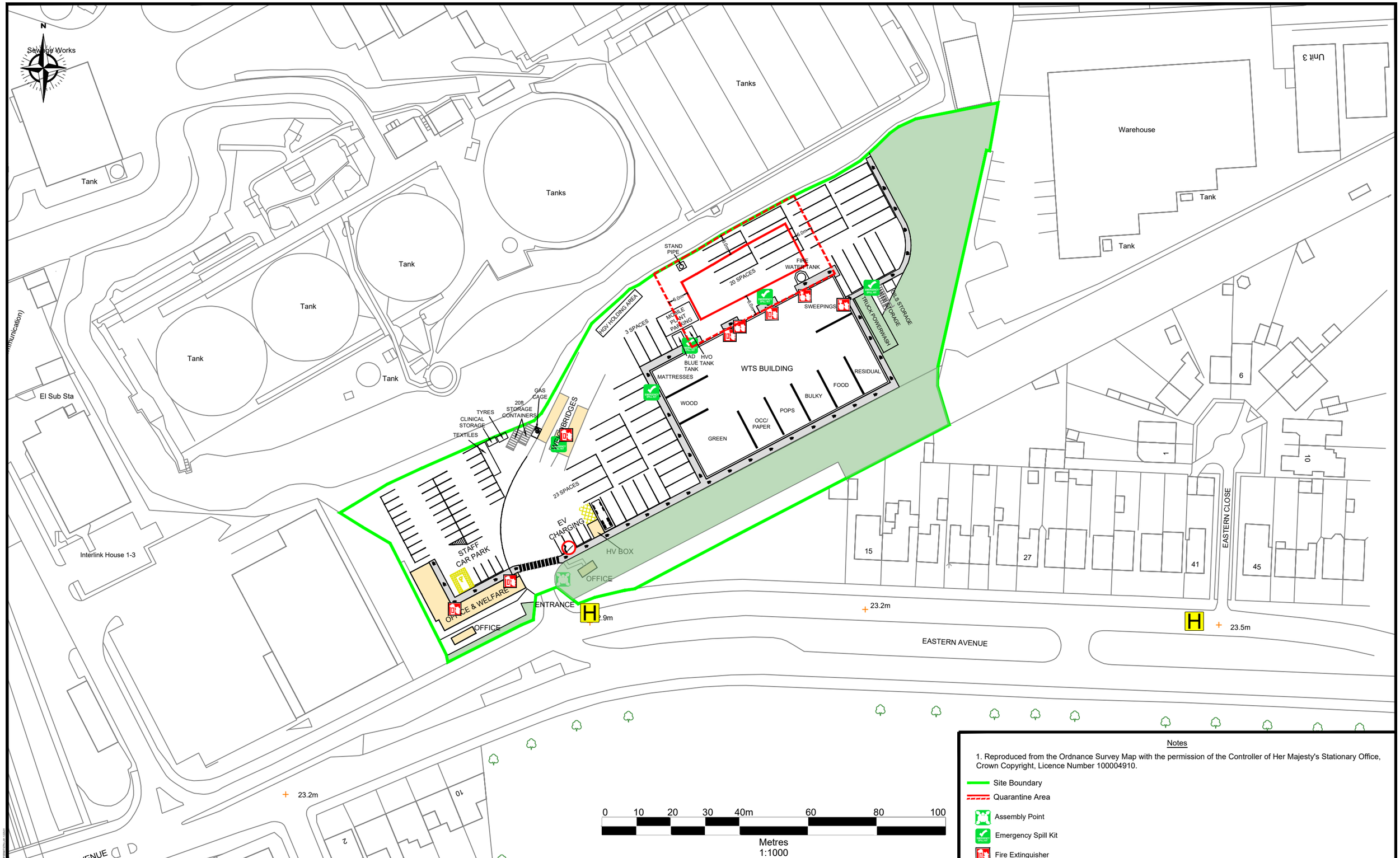
Site Boundary

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@sita.co.uk

Site	Eastern Ave, SouthEnd-On-Sea
Title	Site Location Plan
Scale	1:2500 @ A3
Date	December 2025
Drawing Ref	Etn-LOC-1225-01
Drawn by	RB
Checked by	AS

Rev	subject	date

Figure 2 – Site Layout



0 10 20 30 40m 60 80 100

Metres
1:1000

Notes

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- Site Boundary
- Quarantine Area
- Assembly Point
- Emergency Spill Kit
- Fire Extinguisher
- Fire Alarm Call Point
- Smoking Area
- Fire Hydrant

suez

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@suez.com

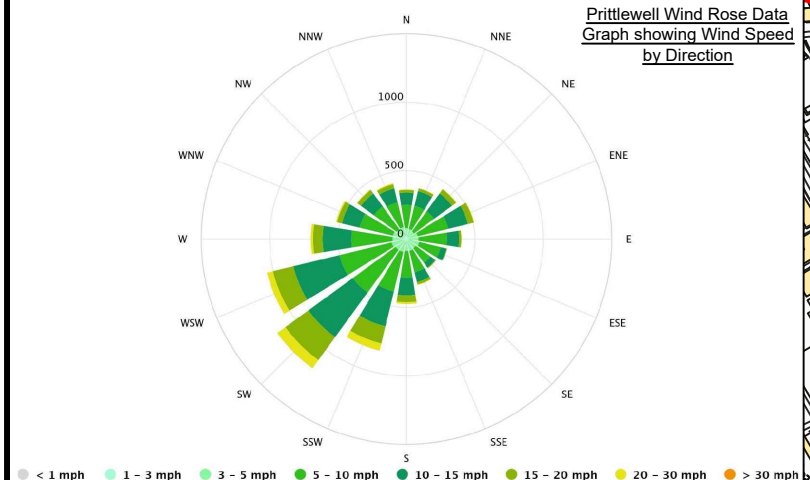
Site	Eastern Ave WTS
Title	Site Layout
Scale	1:1000 @ A3
Date	December 2025
Drawing Ref	Etn-LAY-1225-01
Drawn by	RB
Checked by	BP

Rev	subject	date

Figure 3 – Site Receptor Plan

Prittlewell

Prittlewell Wind Rose Data
Graph showing Wind Speed by Direction



Notes

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Permit Boundary
1km Offset
Receptors

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@silta.co.uk

Site	Eastern Ave, SouthEnd-On-Sea
Title	Site Receptor Plan
Scale	1:7,500 @ A3
Date	June 2025
Drawing Ref	Etn-REC-0625-01
Drawn by	JA
Checked by	AM

Rev	subject	date