

Odour Management Plan



Stoke Transfer Station

Permit Reference: EPR/CB3906TM

Date: December 2025

Version: 1.0

Version History

Version	Revision date	Date submitted to Environment Agency	Reason for revision	Revision owner
V1.0	December 2025	December 2025	Variation to bespoke	D Canning

Contents

1. Introduction	4
1.1. Site description	4
1.1.1. Type of site	4
1.1.2. Site setting and location	4
1.1.3. Operational profile	4
1.2. Maintenance and review of the OMP	5
Table 1.2 - Training, document access and key review intervals	5
1.3. Relevant sector guidance on which this OMP is based	6
Table 1.3 - Reference documents	6
Develop a management system: environmental permits	6
2. Receptors	7
2.1. Receptor List	7
Table 2.1. List of representative receptors	7
Table 2.2. Other potential odour sources	8
2.2 Wind rose and source of weather data	9
3. Sources of odour and site processes	10
3.1. Odorous materials entering and leaving site	10
3.1.1. Character of inputs and outputs	10
3.1.2. Maintaining control of inputs	10
3.1.2.1. Contractual control	10
3.1.2.2. Waste Acceptance Procedures	11
3.1.2.3. Arrival of non conforming waste	11
3.1.2.4. Excessive Influx of Waste	11
3.2. Odorous materials	12
Table 3.2 Odorous materials	12
3.3. Overview of odorous processes and emissions	14
3.3.1. Site layout and buildings	14
3.3.2. Loading and unloading areas	14
3.3.3. Storage areas	14
3.3.4. Processing areas	15
3.3.5. Food Waste	15
3.3.6. Mobile plant	15
3.3.7. Odour emission points	15
4. Control measures and process monitoring	16
4.1. Appropriate measures	16
Table 4.1 Monitoring procedures for appropriate measures	16
5. Odour reporting	20
5.1. Complaints reporting	20
5.1.1. Complaint recording	20

5.2. Investigation of Odour Complaints	21
5.2.1. Complaint screening	21
5.2.2. Further investigation / substantiation	21
5.3. Community engagement	22
5.3.1. Communicating with the Environment Agency	22
5.3.2. Communicating with complainants	22
5.4. Pro-active odour monitoring	23
5.5. Reactive odour monitoring	23
5.6. On site and off site monitoring (when required)	24
6. Abnormal events	25
Table 6.1 Abnormal events	25

1. Introduction

1.1. Site description

1.1.1. Type of site

The Stoke Transfer Station operated by Veolia ES (UK) Limited 'VES' has operated under standard rules SR2008 No1 which is being varied into a bespoke permit. The facility will accept and transfer up to 75,000t per year of non-hazardous waste.

The Stoke Transfer Station has the primary purpose of serving regional transfer and bulking requirements of commercial customers. No domestic waste is expected to be transferred through the facility. No treatment will be carried out at the facility.

1.1.2. Site setting and location

The facility is located in an industrial/commercial estate outside of the outskirts of Stoke.

The full address for the site is detailed below:

Veolia ES (UK) Limited
Stoke Waste Transfer Station
Alderflat Drive
Trentham
Stoke
ST4 8HX

Grid Reference: SJ 88997 40746

1.1.3. Operational profile

The core hours of operation for the site are 05.00 to 18.00 Monday to Friday, 07.00 to 13.00 on Saturday but these hours may vary due to operational/seasonal demand.

1.2. Maintenance and review of the OMP

Table 1.2 - Training, document access and key review intervals

Training / review aspect	Details
Post holder responsible for OMP related training	Lee Hollins
OMP storage location (physical copy)	Site management system folder (hard copy)
Review interval criteria	<p>Annually (entire document)</p> <p>Following an incident which resulted in actual or potential odour pollution (relevant sections)</p> <p>Following instruction by the Environment Agency under the relevant condition of the environmental permit (as agreed with the regulator)</p>
Training overview	<p>The Veolia Management System 'VMS' includes a procedure that defines the process and responsibilities of personnel involved in the identification and evaluation of learning and development needs as well as the subsequent implementation of essential training to enable all employees to perform effectively and proficiently in their individual jobs</p> <p>Site personnel are aware of the parts of the permit relevant to their role and a copy of the permit is available</p> <p>A training matrix for all site personnel is in place and updated with all personnel trained according to the requirements of their role, including refreshers</p> <p>Monitoring is in place to demonstrate competency</p> <p>All weighbridge personnel have completed weighbridge training including Elamos.</p> <p>Veolia operatives will receive hands-on training on managing malodorous wastes from the process supplier and through Veolia's web-based training package, Valobio.</p>
Training interval	Management will maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment.

1.3. Relevant sector guidance on which this OMP is based

Table 1.3 - Reference documents

Guidance title	Source	Publication date / date accessed
Odour Management: Comply with your Environmental Permit	https://www.gov.uk/guidance/odour-management-comply-with-your-environment-permit	December 2025
Develop a management system: environmental permits	https://www.gov.uk/guidance/develop-a-management-system-environmental-permits	Nov 2025 [accessed]
Non-Hazardous and inert waste appropriate measures	https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities	August 2023
Transfer and storage of food waste	LIT74755	20/3/2025

2. Receptors

2.1. Receptor List

Table 2.1. List of representative receptors

Receptor reference	Land use e.g. house, school, hospital, commercial	Direction from site	Direction descriptor	Approximate distance to site boundary (m)	Sensitivity to odour
R1	Newpark Plantation	Southwest	Hem Heath Wood & Newstead Wood LWS / protected habitat area	Common boundary on one corner	Low
R2	Industrial/Commercial estate	South & East	Industrial/Commercial	10m	Medium
R3	A5035 road	North	Transport	400m	Low
R4	Nearest residential	Northeast	Residential	440m	High
R5	Hem Heath retail centre	North	commercial	450m	Medium
R6	NG Healthcare	Northwest	Residential care	510m	High
R7	HEM Heath nature reserve	Northwest	Hem Heath Wood & Newstead Wood LWS / protected habitat area	720m	Low
R8	Hospice	Northwest	Residential care	720m	High
R9	Newstead primary school	East	Education	730m	High

Receptor reference	Land use e.g. house, school, hospital, commercial	Direction from site	Direction descriptor	Approximate distance to site boundary (m)	Sensitivity to odour
R10	Newstead wood	South	Hem Heath Wood & Newstead Wood LWS / protected habitat area	780m	Low

Table 2.2. Other potential odour sources

Site	Activity	Distance from Site	Direction from site
Biffa Waste Transfer Station	Waste transfer	Adjacent to the site	East

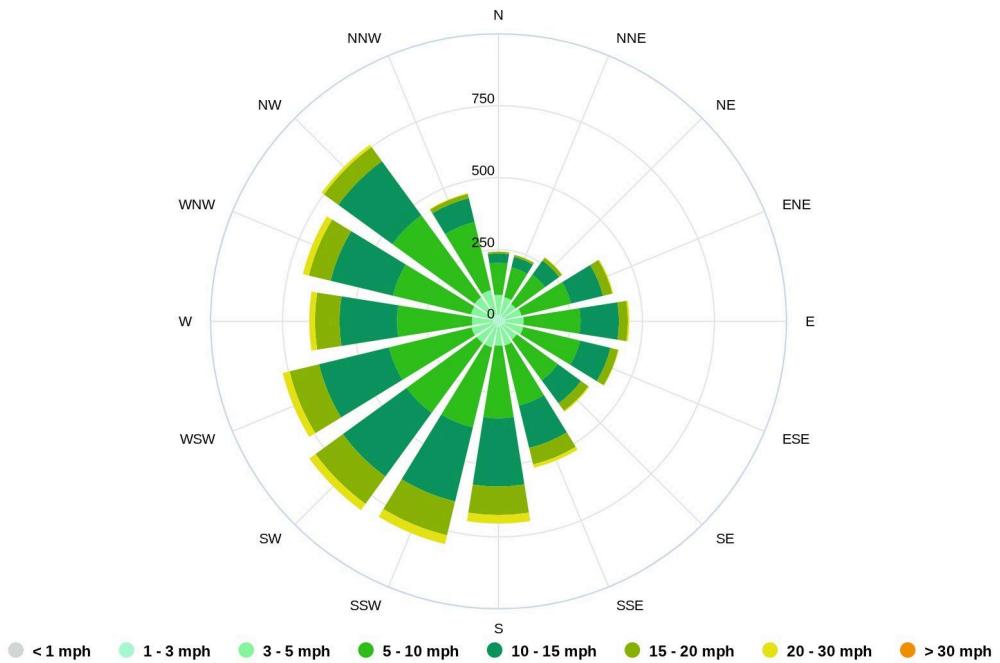
2.2 Wind rose and source of weather data

The most common wind direction is towards the north east.

Stoke-on-Trent

53.00°N, 2.19°W (114 m asl).

Model: ERA5T.



Source:

https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/stoke-on-trent_united-kingdom_2636841

3. Sources of odour and site processes

3.1. Odorous materials entering and leaving site

3.1.1. Character of inputs and outputs

Waste collected from industry, commercial activities and businesses will be delivered by collection vehicles of various types including Roadside Collection Vehicles 'RCVs' and skips. No household collected waste is expected to be delivered to the site. The waste will typically be recyclates, paper/card/glass, waste wood or residual waste not considered suitable for recycling. Small amounts of other waste are anticipated such as soil/rubble and green waste. A food waste transfer activity is expected to commence with the introduction of simpler recycling.

Table 3.2 describes the types of odorous material accepted and produced at the site. All material received at the site will be bulked and transferred off site for recovery/disposal elsewhere, no treatment will occur on site.

The majority of material brought to site is of low odour potential with the exception of food waste, this waste is described as having a high odour potential. This majority of the waste is described as having medium source odour potential as they may contain a minimal organic fraction although this characterisation is conservative based on operational experience at this and other facilities handling these waste streams. Suitable storage residence times have been selected to ensure material leaving the site is not categorised as having a higher odour potential or more adverse hedonic tone than the input material.

All vehicles bringing waste into the Facility will be enclosed or covered which will reduce fugitive emissions during transport. All vehicles removing waste from the Facility will be enclosed or covered.

3.1.2. Maintaining control of inputs

3.1.2.1. Contractual control

A major factor affecting the potential for odour emissions at the waste delivery and reception stage is the content and nature of the material. VES policy with its waste suppliers - specifying the inputs that are unacceptable and the frequency of deliveries - is the main control measure. VES will exercise rigorous control of delivered waste. In any contractual agreement there will be a clause which covers the delivery of malodorous content material. It will be within the site supervisor's power to reject any material (e.g. contaminated or odorous wastes that have been stored too long) that will jeopardise the ability to manage the site and prevent the emission of unacceptable odours.

3.1.2.2. Waste Acceptance Procedures

On-site operatives will be trained as to the acceptability criteria for incoming loads. Waste will only be accepted if:

- It conforms to the type and maximum quantity that is specified in the Environmental Permit; and
- It conforms to the description in the documentation supplied by the producer and holder.

A waste acceptance procedure is followed to ensure that only suitable waste is accepted into the facility in accordance with the Environmental Permit.

3.1.2.3. Arrival of non conforming waste

Procedures are in place so that incoming waste considered to be malodorous will be removed immediately or rejected from the site. If it is deemed necessary, inputs can be refused or diverted to alternative facilities if odour pollution is considered likely.

Vehicles will be directed to tip within a specific waste bay, as directed by the site staff. Once tipped, if the load is found to be malodorous and / or not conforming to pre acceptance criteria the site supervisor will make the decision to either re-load immediately or reject the waste from site.

For waste acceptance in general all business contracts establish collection schedules and storage arrangements that are suitable for the waste types and business size i.e. sealed bins that are emptied on an agreed frequency.

Any rejected inputs will be re-loaded on the delivery vehicle immediately and the manager will contact the site of origin / council to inform them of the rejection from the site and to remind them of the quality of input material deemed acceptable.

3.1.2.4. Excessive Influx of Waste

If there is an excessive influx of waste into the facility, further loads will be diverted to one of our other waste facilities. Veolia has a network of waste facilities across the country including transfer stations, MRFs, RDF facilities and ERF all capable of accepting diverted material. Records will be maintained of all waste accepted onto the site.

3.2. Odorous materials

Table 3.2 Odorous materials

Odorous and potentially odorous material (any solid, liquid or gas)	Odour potential High Risk / Medium Risk / Low Risk	Maximum quantity on site at any given day (m ³ unless otherwise stated)	Maximum time held on site (hours or days)	Location of odorous materials on site ²	Additional comments
INPUTS FOR TRANSFER / BULKING					
Residual commercial/industrial waste	Medium	300	10 days	Internal bays	Transfer / bulking only, not expected to be a source of off site emissions.
Dry mixed recyclate	Medium	150	10 days	Internal bays	Transfer / bulking only, not expected to be a source of off site emissions.
Card	Low	75	30 days	Internal bays	Transfer / bulking only, not expected to be a source of off site emissions.
Food	Medium / high	73 30	3 days 5 days	Internal - food bay External - sealed container	Transfer / bulking only.
Glass	Low	145	10 days	External - glass bay	Transfer / bulking only, not expected to be a source of off site emissions.
Wood	Low	230	3 months	External - wood bay	Transfer / bulking only, not expected to represent a risk of off site odour emissions.
Scrap metal	Low	30	3 months	External - container	Transfer / bulking only, not expected to be a source of off site emissions.
Other input waste streams (internal)	Medium / high	According to requirements	According to risk	Internal	As a transfer station the Facility will respond to customer demands to maximise

Odorous and potentially odorous material (any solid, liquid or gas)	Odour potential High Risk / Medium Risk / Low Risk	Maximum quantity on site at any given day (m ³ unless otherwise stated)	Maximum time held on site (hours or days)	Location of odorous materials on site ²	Additional comments
			(maximum 3 months)		opportunities within the circular economy. The proposed list of acceptable waste inputs (list of wastes) allows material input types to be flexible. Material with an odour potential above 'low' will be stored internally.
Other input waste streams (external)	Low	According to requirements	According to risk (maximum 3 months)	External	As above except, no material having an odour potential above 'low' will be stored externally.

3.3. Overview of odorous processes and emissions

3.3.1. Site layout and buildings

The site general arrangement is described in drawing reference VES_TD_STOKE_300_005. Briefly the site comprises a portal frame transfer station building with distinct internal bays for storage and bulking of residual waste, dry mixed recycling, card etc. Other wastes may be accepted in accordance with the list of permitted waste, these will be subject to the same controls outlined in this document. There are external bays for glass and wood.

3.3.2. Loading and unloading areas

Waste will be delivered throughout the working day. Following acceptance checks and weighing waste arriving at the site is tipped and bulked in the input bays as instructed by the site operatives. The newly deposited waste is visually inspected by the shovel driver once the waste is tipped on the floor. Any contaminants are removed and disposed of to landfill or another facility. Vehicles will reverse into the dedicated marked bay within the facility or externally depending on the waste type. Transfer of bulked waste will take place using mobile plant (including a 360 grab or loading shovel). Bulker vehicles will predominantly be loaded within the confines of the building.

If a whole load is deemed to be unacceptable due to contamination, the operator will inform the site supervisor. If the site supervisor agrees with the operative's assessment then the load may be manually picked to reduce the contamination. If this is not possible, then the contaminated load will be quarantined and removed from the site.

3.3.3. Storage areas

The General Arrangement drawing shows the location of all internal and external storage areas for waste material. External storage areas include wood and glass bays and containers for food waste and scrap metals. The incoming loads of wastes are weighed at the weighbridge situated at the entrance of the site. Waste material classified as having a source odour potential above medium (residual waste) is stored within the transfer station building. The building is fitted with electrically operated shutter doors that are closed outside of operating hours. A dust & odour suppression system is fitted around the key operational areas and used to prevent the build-up of airborne dusts & smells when required. The residence time for waste on site has been selected on a risk basis to minimise increase in source odour potential between input and output material (see table 3.2).

External areas are used to store waste which has been classified as having a low odour potential except for food waste. Food waste will however be stored within an enclosed leakproof container when stored outside to minimise odour.

3.3.4. Processing areas

No processing or treatment of waste will take place at the facility.

3.3.5. Food Waste

With the coming advent of Simpler Recycling a need has been identified for the transfer of food waste collected from commercial/industrial premises, this will primarily be from shops, offices, pubs, restaurants, etc. DEFRA is currently developing between the EA and APHA a unified guidance/regulatory approach covering environmental and biosecurity controls to be compatible with the introduction of Simpler Recycling. Food waste storage and transfer will not commence until this guidance is published, once published this guidance will be followed at Stoke Waste Transfer Station.

It is anticipated that the following principles will apply:

- A dedicated bay will be used within the transfer building, which is on an impermeable surface with sealed drainage.
- All food will be loaded into a sealed container/trailer by the end of the working day, the food waste trailer/container will be removed from site at least twice per week, fifo will apply.
- A cleaning and disinfection procedure will be in place.
- Contingency plans for planned and unplanned shutdowns.

3.3.6. Mobile plant

Mobile plant associated with the activity will include haulage vehicles associated with waste inputs and outputs and loading equipment. The working area within the transfer station will be kept clean to ensure that vehicles and waste leaving the site do not transfer odorous material offsite.

3.3.7. Odour emission points

There are no point source emission points

4. Control measures and process monitoring

4.1. Appropriate measures

Table 4.1 Monitoring procedures for appropriate measures

Odorous and potentially odorous process / material	Control measures (Appropriate Measure)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level	Action taken if outside optimum process parameters
INCOMING WASTE					
Waste delivery and reception	<p>Pre-acceptance criteria / contractual control of quality</p> <p>Visual inspection of incoming waste is completed with clear and communicated acceptance criteria</p>	Every load of incoming waste	<p>A copy of the European Waste Catalogue (EWC) codes as specified by the permit along with a simplified description of acceptable waste is available. Only waste on this list can be accepted and a procedure for dealing with non-conforming waste is in place.</p> <p>Pictorial standards are used and displayed with respect to identification of contamination.</p> <p>Sampling and analysis is completed according to customer requirements.</p>	Identification of a non-conforming load	<p>Load assessed on a case by case basis and either prioritised for processing or rejected. A quarantine area is available, demarcated and with signage where loads require decanting for assessment. Feedback provided to waste producer / haulier, discontinuation of contract if necessary.</p>

Odorous and potentially odorous process / material	Control measures (Appropriate Measure)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level	Action taken if outside optimum process parameters
			Optimal - pre-acceptance criteria ensures only suitable waste is brought to the facility.		
Tipping in the reception hall bays	Acceptance criteria / contractual control of quality.	Tipping of each load	Every load tipped has visual inspection with clearly defined acceptance criteria. Loader drivers are trained in waste acceptance. Processes are in place to safely manage contamination and non-conforming waste. Optimal - acceptance criteria ensures only suitable waste is accepted at the facility	Identification of a non-conforming load	As above.
Tipping in external bays	Acceptance criteria / contractual control of quality.	Tipping of each load	As above	Identification of a non-conforming load	As above
Waste storage in transfer station	FIFO system	Constant – ongoing through shift	Visual inspection to ensure the bay with the oldest material is emptied first and additional bays are not allowed to fill completely Optimal - FIFO achieved	Last available storage bay more than half full	If reception storage is reaching capacity, waste deliveries will be reduced or ceased until the process is back under control
	Max. waste residence time linked to odour potential	Daily	Computerised waste monitoring and tracking system. Optimal - waste residence time below stated maximum.	Waste residence approaching or just exceeding stated maximum	Waste qualitatively assessed for odour emission / potential. Waste dispatch arranged and expedited if required Residence time reviewed if required

Odorous and potentially odorous process / material	Control measures (Appropriate Measure)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level	Action taken if outside optimum process parameters
			Optimal - maximum residence time not exceeded, no unacceptable off site odour		
	Roller shutter closed outside of operating hours	Set PPM interval	Inspection checks are completed on roller shutter doors Operational checks are in place and included in the PPM schedule Doors operate within full range, closing to ground level	Door failure (see section 6)	See section 6
Fugitive emission from vehicle access / egress	A dust & odour suppression system used to prevent the build-up of airborne dusts & smells when required	Set PPM interval	Inspection checks are completed on dust and odour suppression system Operational checks are in place and included in the PPM schedule Doors operate within full range, closing to ground level	dust and odour suppression system (see section 6)	See section 6
	Agreed delivery schedules	Constant – ongoing through shift	Weighbridge operative monitors vehicles waiting to enter the Facility	Multiple vehicles arrive on site with waste to deposit	As above
Waste storage in external bays	As per internal bay plus: Only waste with low odour potential is stored externally.	Constant – ongoing through shift Implemented as part of site design	Waste acceptance and storage procedures Optimal - waste stored externally does not cause odour off site	Identification of non conforming load / un expected odour	Investigate source and prioritise for processing or disposal / recovery to a suitably licensed facility

Odorous and potentially odorous process / material	Control measures (Appropriate Measure)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level	Action taken if outside optimum process parameters
Loading of waste for dispatch	<p>Bulk vehicle loading carried out predominantly internally to the building</p> <p>Visual checks on all exiting vehicles are completed to ensure no trailing debris</p> <p>Area is kept clean and tidy</p>	During loading activity	<p>Visual observations by trained staff and supervisors. Minimum requirement that site manager carries out a monthly site walk around</p> <p>Optimal - no accumulations identified</p>		

5. Odour reporting

5.1. Complaints reporting

All feedback including complaints and non-conformances are recorded and reviewed with corrective and preventive actions put in place in accordance with Complaints and Non-Conformance Reporting procedures.

The management of complaints is controlled by the Veolia Management System 'VMS'. Managers shall ensure that all complaints have been investigated, adequately handled and that any measures necessary to prevent a recurrence have been put in place.

5.1.1. Complaint recording

The recommended minimum level of detail that needs to be collected when an odour potentially linked to on site activities is reported is as follows:

- the time and date when the offensive odour was observed;
- the location (within approx. 100 m) where the offensive odour was observed, e.g. postal address, grid reference)
- the sensitivity of the location;
- a description of odour including a subjective all factors necessary to make an assessment of the impact, including intensity, character (preferably on the basis of a choice from standardised descriptors given in Environment Agency Technical Guidance Note H4), offensiveness, frequency and duration;
- the identity and address of the reporter, if provided / consented, in order to understand the spread of complaints and the number of individuals impacted;
- any other information the reporter can offer on activities at the alleged odour source

It is also necessary to collect (by observation or further investigation) the following additional information to allow subsequent analysis and collation of complaints:

- wind direction and speed, and atmospheric stability class at the time of complaint; and
- any process incidents at the time of complaint.

Complaints are recorded on the standard AVA complaint form. This should then be recorded on AVA as an attachment to the AVA complaint entry.

5.2. Investigation of Odour Complaints

The aim of the investigative actions will be to establish:

- the source of the odour complaint; and
- the impact of the odour
- appropriate measures / actions required to prevent pollution if required

5.2.1. *Complaint screening*

The object of the initial screening is to quickly identify those odour complaints that are unlikely to be due to the facility.

Initial screening should consider the following:

- knowledge of potential sources on the facility (timing of the report cross referenced with work activities in progress, any plant problems, etc);
- knowledge of other potential sources in the locality other than the facility;
- wind direction at the time of the alleged odour episode relative to the location of the facility and the reporter;
- distance of the reporter from site; and
- concurrent odour monitoring data where available

VES will liaise with local stakeholders (including the complainant) and inform them on the outcome of the screening assessment of the complaint and whether or not any action is to be taken.

5.2.2. *Further investigation / substantiation*

If the initial screening does not discount the facility as a potential source of the odour reported further investigation will be carried out using:

- on and off-site odour monitoring techniques (sniff testing), using the 'Odour report form' included with this document.
- a review of activities being carried out on site using the inventory of odorous emissions to ensure a systematic, risk based review of potential emission sources
- records about process conditions, observations or inspections at the time of report

Note that on and off site odour monitoring is not appropriate where reports are made retrospectively but records can still be reviewed.

Where the odour is substantiated, VES will carry out a root cause analysis to identify the conditions which are leading to unacceptable odour emissions from the Facility and review containment and control measures as appropriate.

5.3. Community engagement

5.3.1. *Communicating with the Environment Agency*

In the event a report of odour is received from a member of the public the local Environment Agency officer / team will be informed by telephone or email and a 'Notification of Abnormal Emissions' form will be submitted if the report is substantiated.

5.3.2. *Communicating with complainants*

In the case of answerphone messages a return call will be made as soon as possible and within 48 hours. In the case of complaints submitted by email or by letter, a written response will be made within 15 working days of submission of the complaint for complaints made by members of the public, or 5 working days for complaints made by an MP or Councillor.

In the case of further investigations, VES will communicate to the complainant the course of actions likely to be taken so as to ensure that there is transparency and also to establish at the outset clear targets and goals for determining the success of any control measures.

The level of annoyance associated with odours can often be reduced if affected individuals are provided with information about what they are smelling, the process that generates the odours, any factors affecting dispersion, what health impacts might be associated with the odour, what efforts are being undertaken to control odours and what is being done in response to their complaint. These actions can help affected individuals to moderate their own emotions of powerlessness and fear which may be exacerbated by odour. Liaison with the local community, offering credible reassurance and taking complaints seriously are often effective means of mitigating odour nuisance. To put this into practice, VES will aim to communicate the following message:

- The reason for the odour;
- The likely duration of the odour
- What plan is in place to end the odour episode
- What preventative plan will be implemented to prevent a re-occurrence
- What grievance procedure the aggrieved party can take
- Who is the responsible person on site to contact

Members of the public are able to contact VES directly with any odour complaints about the Facility. Methods of contacting VES will be displayed at the site, shown on the company website and communicated through meetings, press releases, bulletins and other forms of advertisement in connection with the operation of the Facility.

Monthly site reviews are in place reviewing all aspects of site performance including performance against objectives, site improvement plan, customer feedback (Customer Feedback Procedure) and site actions.

Quarterly reviews with General Managers are in place. Reviews include objectives, customer feedback, site improvement plan, review of actions and performance (Management Review).

5.4. Pro-active odour monitoring

VES will dynamically monitor emissions at their source (i.e. on site) to minimise the likelihood of odour nuisance at sensitive receptors. This monitoring will consist of inspection of feedstock, process, buildings and equipment to check that emissions are being contained and controlled in accordance with the measures identified in this document.

Routine pro-active off site odour monitoring is not indicated for this facility because of the low residual risk of off site odour emissions. Routine monitoring for low risk sites has a risk of becoming administrative and devalued over time. This approach will be reviewed as deemed appropriate by site management. Routine periodic monitoring may then be instigated.

5.5. Reactive odour monitoring

Given the pre-acceptance controls in place and the short residence time the potential for unacceptable odour emissions off site is considered to be low. VES will therefore undertake sniff testing dynamically based on the following criteria:

- Observation by trained staff that odour pollution is or may be occurring
- Receipt of waste which is deemed to be borderline malodorous and has triggered a decision to reject the vehicle / load
- Receipt of waste which is deemed to be malodorous but a decision is made that offsite impact could be avoided or minimised by prioritising this material for processing
- Any abnormal operation where there is considered to be a risk of odour pollution
- If notified a complaint is received externally

- If instructed to undertake an off site check by the Environment Agency

Ensuring staff are trained to undertake sniff testing in this manner ensures that the reasons for making a decision to carry out monitoring are well understood.

5.6. On site and off site monitoring (when required)

Trained staff will determine what combination of on and off site odour monitoring is appropriate based on the following principles.

- Where on site checks identify pollution is or may be occurring off site checks should be carried out.
- Where an external complaint has been received both on and off site checks should be carried out, in this case off site checks should ideally be carried out first to prevent desensitisation due to higher intensity odours closer to the source.

The sensory field odour (“sniff test”) assessments will be carried out based on the Environment Agency Sniff Test protocol in EA guidance using the ‘Odour report form’ included in this document. The person carrying out the sniff test will be rotated on a regular basis to ensure reliability; where possible staff members who have been working within the transfer facility for an extended period will not conduct odour monitoring to avoid the desensitising effect caused by prolonged exposure (note this may not always be logistically possible. Where possible testing will be undertaken by non-operational staff and management.

6. Abnormal events

Table 6.1 Abnormal events

Abnormal event	Recovery steps
Equipment Breakdown	<p>A list of spares required and the procedure for re-ordering will be developed as part of Veolia's Management System and will be based on the manufacturers recommendations together with standby equipment for some critical items.</p> <p>If required waste will be diverted in accordance with the alternative outlets identified in the business continuity plan. Veolia has a network of waste facilities across the country including transfer stations, MRFS RDF facilities and ERF's all capable of accepting this material.</p> <p>Reasons for failure will be investigated (in association with supplier/contractor) and maintenance plan revised if necessary.</p> <p>Depending on how quickly the equipment can be repaired, the Competent Person will decide if it is necessary to redirect delivery vehicles already on the facility (not having discharged their loads) and incoming vehicles to other licensed facilities.</p> <p>If required, waste suppliers will be contacted at the earliest opportunity and the situation explained – temporary redirection of delivery vehicles to other facilities might be required.</p>
Door or dust and odour suppression system failure	<ul style="list-style-type: none"> - Instigate contractual arrangement for system diagnostics and repair. - Establish lead time and plan actions below accordingly. <p>Then several options are considered:</p> <ul style="list-style-type: none"> - Consider seasonal impact, during warmer months perceived off site impacts will be higher. - Continue to operate all activities and implement off site odour checks. Keep under active review and implement further measures if unacceptable off site odour is established (either via operator check / external complaint / regulatory observation). - Decrease waste residence time. - Reduce inputs. - Suspend inputs. - Remove waste with higher odour potential from site. <p>Reason for failure will be investigated (in association with supplier/contractor) and maintenance plan revised if necessary.</p>
Fire	<p>The site operates in accordance with a Fire Prevention Plan. In the event of a fire impacting site infrastructure associated with odour control including the fabric of the building and / or abatement systems residual waste would be removed and waste acceptance would be suspended until appropriate controls are in place to resume operations.</p>

Spillage	Competent Person to initiate accident response plan – delivery vehicle made safe. If drivable, remaining material discharged into reception hall or vehicle removed off site. Spilt materials and debris immediately collected and transferred into reception area. Spill area then cleaned and hosed down.
Flood	The site is not within a flood zone.
Staffing shortage	Contingency measures for staff availability are included within the BCP. Veolia has sufficient resources to redeploy staff from other facilities should this be needed.

Odour report form		Date:		
Person carrying out test:		Role:		
IMPORTANT: START ALL ODOUR ASSESSMENTS UPWIND OF THE SOURCE (WHERE ACCESS IS POSSIBLE). RECORD ALL ODOURS INCLUDING OFF SITE SOURCES.				
Reason for test (see section on proactive and reactive monitoring)				
Time of test				
Location of test Use ref in tab 6.1				
Weather conditions (dry, rain, fog, snow, etc)				
Temperature (very warm, warm, mild, cold, or degrees if known)				
Wind strength (none, light, steady, strong, gusting)				
Wind direction (e.g. from NE)				
Intensity (see below)				
Duration (of test)				
Constant or intermittent in this period or persistence				
What does it smell like?				
Receptor sensitivity (see below)				
Is the source evident?				
Any other comments or observations				
Intensity: 0 No odour 1 Very faint odour 2 Faint odour 3 Distinct odour	4 Strong odour 5 Very strong odour 6 Extremely strong odour Ref: German Standard VDI 3882, Part 14	Receptor sensitivity Low (e.g. footpath, road) Medium (e.g. industrial or commercial workplaces) High (e.g. housing, pub/hotel etc)		