ODOUR MANAGEMENT PLAN

Land at Chemical Lane, Tunstall, Stoke-on-Trent, ST6 4NU

Land Recovery Ltd

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Waste, Planning & Environmental Consultants



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Olfactory Assessment Survey Form

Odour Complaints Report Form

Odour Diary

1 Introduction

1.1 General

- 1.1.1 Oaktree Environmental Ltd has been instructed by Land Recovery Ltd to prepare an Odour Management Plan ("OMP") for their hazardous and non-hazardous waste transfer and treatment facility at Land at Chemical Lane, Tunstall, Stoke-on-Trent, ST6 4NU.
- 1.1.2 The site address and contact details for Land Recovery Ltd (i.e. the 'site operator') is:

Land at Chemical Lane, Tunstall,

Contact:

Dan Beecroft

Stoke-on-Trent, ST6 4NU

Position:

Director/TCM

- 1.1.3 The site is operated in accordance with an Environmental Management System (EMS) and Fire Prevention Plan (FPP) along with other documents targeted to specific environmental considerations including this OMP.
- 1.1.4 This OMP will allow Land Recovery Ltd to implement an action plan should the site operatives detect an odour presence, receive complaints from local business or residents and if the EA suspects odour emissions from the site during an inspection.

1.2 Site Location

- 1.2.1 The site is located on Land at Land at Chemical Lane, Tunstall, Stoke-on-Trent, ST6 4NU. The national grid reference for the site is SJ 85224 50580.
- 1.2.2 The site is located within a large industrial area with a long history of uses ranging from alum works through to LPG storage other parts of the site were formerly a sewage treatment plant whilst the area to the north was originally a residential street which was demolished at least 50 years ago. The site now has neighbouring businesses which include Oil works, a large tile manufacturing plant, aroadstone coating plant, metal fabrication and repair and various light industrial and storage units.

1.3 Waste Facility Overview

- 1.3.1 Land Recovery Ltd are applying for an Environmental Permit for a hazardous and non-hazardous waste treatment and transfer facility. The facility is operated by Land Recovery Ltd. The applicant currently manages a similar site in Cambridgeshire for Network Rail.
- 1.3.2 The site consists of large open yards which are to be used primarily for the storage and washing of waste rail ballast arising from maintenance and construction works on the rail network other CDE wastes may also be treated in the washing facility. Part of the site will also be used for the sorting and shredding of wooden railway sleepers and other waste wood.
- 1.3.3 Other wastes arising from maintenance and development works on the rail network will be accepted and stored prior to despatch to suitably permitted sites for recovery/disposal.
- 1.3.4 These materials will generally be delivered in secure containers and remain in those containers until removed from site some bagged materials may be transferred into sealed bulk containers.
- 1.3.5 No blending or bulking other than placing sealed bags into sealable containers will be carried out for these wastes.
- 1.3.6 The robust pre-acceptance procedure includes an assessment of the odour potential which for ballast and CDE wastes will be minimal. The pre-acceptance procedure will also lead to the generation of advice on the spillage clean-up procedure for the wastes to be accepted for storage only this will include actions to minimise odour release in the event of a spillage.

1.4 Waste Types and Quantities

1.4.1 The waste types handled on site will consist of a range of hazardous and non-hazardous wastes that are considered likely to arise from the rail network operations plus wastes which it is considered will be suitable for treatment via the washing plant or wood shredding

operation these are set out in document 3925/701/WA, which includes the storage limits for the wastes which could present an odour hazard.

- 1.4.2 There are no wastes which the site accepts which have a significant odour potential however some may have odour potential in specific weather conditions or in the case of an accidental spillage.
- 1.4.3 No wastes accepted for storage only are on-site for longer than 3 months, all such wastes are stored in closed/sealed containers which will not allow the escape of odour. In hot weather the railway sleepers and other treated wood held on site could potentially generate an odour/aroma.
- 1.4.4 Robust pre-acceptance procedures includes an assessment of the odur/odour potential which is taken into account when deciding on what if any treatment is undertaken. The pre-acceptance procedure will also lead to the generation of advice on the spillage clean-up procedure for the waste to be accepted this will include actions to minimise odour release in the event of a spillage.
- 1.4.5 The place and date of storage will be recorded on the waste recording system this will ensure wastes can be identified at any point during the storage and processing operations (as detailed in the Fire Prevention Plan).
- 1.4.6 If the maximum storage capacity is reached then no further waste will be accepted until waste can be removed from the site and taken to a suitably permitted or exempt site.

1.5 <u>Site Management</u>

1.5.1 The site has at least two Technically Competent Managers (TCMs) who are responsible for the general management of the site, including the acceptance and handling of any potentially odorous wastes.

1.5.2 The company, through the TCMs, will ensure that nominated deputies are sufficiently trained and familiar with all site management documentation (which includes this OMP) in addition to all relevant company procedures.

2 Odour Risk Assessment

2.1 Methodology

2.1.1 This OMP has been completed to identify where the likely risks are in relation to surrounding land uses. This assessment has been used to inform Section 5.0 of this OMP with regard to specific odour monitoring procedures.

2.2 **Odour Intensity**

2.2.1 Table 2.1 below highlights the intensity of the odour and provides a description by which to measure the intensity and a scale with which to record it on the Olfactory Assessment Survey Form appendix II.

Table 2.1 - Odour Intensity Scale & Description

Od	dour Intensity Scale & Description
0	No detectable odour
1	Faint odour (barely detectable, need to stand still and inhale facing into wind)
2	Faint to moderate (detectable when moving but not offensive))
3	Moderate odour (odour easily detected while walking and breathing normally, possibly
	offensive)
4	Strong odour (bearable, but offensive- will my clothes/hair smell?)
5	Very strong/Severe odour (this is when you really wish you were somewhere else

2.3 Receptor Sensitivity

2.3.1 Table 2.2 below outlines the receptor sensitivity to odour which will be used when determining nearby odour sensitive receptors:

Table 2.2 - Receptor Sensitivity Criteria for odour

Sensitivity of Receptor	Criteria
Low	Industrial workplaces
Medium	Industrial workplaces / Residential >250 m
High	Residential areas <200m

2.4 <u>Sensitive Receptor Locations</u>

2.4.1 The main potential sensitive odour receptors are listed in Table 2.3 below:

Table 2.3 - Potential Sensitive Odour Receptors within 400m of the site

Receptor name	Туре	Distance and direction from nearest site boundary (approx in m)	Receptor sensitivity to odour
Storage/distribution and manufacturing	Industrial	50m East.	Low
Cloughwood Way Copp Lane	Residential	>150m Southeast >300m Northeast	Medium*
Westport Lake	Recreation Area	>30m South	Medium
Trent and Mersey Canal	Canal Towpath	>20 East	Medium

^{*}These areas are already close to or within a very heavily industrialised area therefore it must be concluded that the residents are to a degree accepting of industrial conditions.

- 2.4.2 Refer to Receptor Plan Drawing No. 3925/701/04B.
- 2.4.3 Total distances are from the area of the waste facility where there is the possibility of storing or treating potentially odorous material closest to the nearest receptor point.

2.5 Risk Matrix

2.5.1 The odour risk in any particular event can be established using the risk assessment matrix given in Table 4 below.

Table 2.4 - Resultant Risk Matrix (Colour-Coded)

		Sensitivity		
		Low	Medium	High
	Negligible	NEGLIGIBLE	LOW	LOW
INTENSITY	Low	LOW	LOW	MEDIUM
	Moderate	LOW	MEDIUM	MEDIUM
	High	MEDIUM	MEDIUM	HIGH
	Severe	MEDIUM	HIGH	VERY HIGH

3 POTENTIAL SOURCES OF ODOUR

3.1 Waste - storage prior to processing

- 3.1.1 The ballast aggregates and CDE wastes are not considered an odour risk, The sleepers and waste wood could conceivably give rise to odour particularly in very hot weather conditions, whilst the wastes accepted for storage only are kept in sealed containers throughout the time they spend on site and whilst a risk this is contained at source.
- 3.1.2 Apart from the railway sleepers accidental spillages of odorous waste are the only possible scenarios where a release of odour could occur.
- 3.1.3 Spillage of waste will be treated as an emergency and acted upon immediately in accordance with the advice of the site manager, appropriate spill kits are available to enable a complete clean up of spillage of any of the accepted waste types. Part of acceptance procedures is to identify the actions required to deal with any spillage of the wastes being accepted and if necessary acquire additional spill equipment to deal with any identified risks risk of odour arising from a spillage would be addressed by the spill clean-up procedure.

3.2 <u>Balast CDE waste – Waste Handling/processing</u>

3.2.1 Ballast/CDE waste is treated via a washing plant experience of the Cambridge site has indicated that this process does not give rise to any risk of odour.

3.3 Wood - Waste Handling/processing

3.3.1 Railway sleepers/telegraph poles may have been treated using materials which in hot weather conditions are capable of generating an odour. If it is forecast that such conditions are likely to occur then efforts will be made to ensure the sleepers are damped down or covered with tarpulins to minimise the release of odour.

3.4 Surface water

3.4.1 The drainage system shown on 3925/701/03 will be monitored regularly to ensure it is functioning correctly and not generating odour.

3.5 Background Odour Sources in the Area

- 3.5.1 Potential local off-site sources of odour could be associated with the storage distribution and manufacturing and in particular the asphalt plant and oil treatment plant(s) that are present in the immediate area.
- 3.5.2 In order to determine whether complaints are the result of activities from the site or from other nearby sites an odour complaints form will need to be completed in line with the company's complaints procedure which is attached in Appendix II.

4 ODOUR CONTROL

4.1 Site Operations

4.1.1 Following site procedures will prevent odour release from the site under normal operating conditions. The only conceivable release of odour would occur if there is an accidental spillage either on its own or associated with some wider incident. Or from the treated waste wood in hot weather.

4.2 Receiving Wastes

- 4.2.1 Rigorous pre-acceptance and acceptance procedures ensure strict control of wastes delivered to the site refer to EMS. Pre-acceptance includes consideration of spillage clean-up procedures which include preventing odour release if appropriate for that specific waste type.
- 4.2.2 If the site reaches capacity and/or operational difficulties occur, incoming wastes will be diverted to another authorised treatment facility.

4.3 Storage of Wastes

- 4.3.1 With the exception of waste wood potentially odorous wastes are always stored in sealed containers. All stock rotation procedures as detailed in the site's FPP will be observed to ensure the maximum duration of storage times are not exceeded.
- 4.3.2 Waste will be stored to ensure compliance with the EP and as detailed in the EMS, FPP, DMP and this OMP document.

4.4 **Loading of Wastes**

4.4.1 With the exception of treated wood all potentially odorous wastes are removed from site in sealed containers. Under normal operating conditions there is no risk of odour release. It is only in accident scenarios where a release is possible the level of such a risk is very low.

4.5 **Housekeeping**

4.5.1 Regular cleaning of operational areas such as roads, drainage channels and holding tank will be carried out to discourage odour generation from drainage and water storage tanks.

4.6 <u>Liaison with Neighbours</u>

- 4.6.1 In the extreme event of significant but temporary odour releases outside normal operations, neighbours will be contacted to advise them of what is occurring and the action being taken.

 The Environment Agency (EA) will also be notified.
- 4.6.2 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.

4.7 **Training**

- 4.7.1 All employees and sub-contractors of Land Recovery Ltd involved with potentially odorous materials and their handling will receive training in Sniff testing (including office/admin workers allocated to undertake the Olfactory (Sniff) test) and complaint reporting (management and operations staff).
- 4.7.2 Training will be given to all relevant persons to make sure they are competent in completing olfactory assessment survey forms, odour complaint report forms and the odour diary to ensure sufficient monitoring of odours can be carried out.
- 4.7.3 Operational staff will receive spill clean-up training including containment of odorous wastes.

5 MONITORING (IF REQUIRED)

5.1 Monitoring Odorous Releases

- 5.1.1 Land Recovery Ltd will use the following techniques to monitor odorous releases:
 - a) Olfactory Monitoring
 - b) Complaints Monitoring
 - c) Odour Diaries (when necessary)

5.2 Olfactory Monitoring

- Odour will be monitored if there is a spillage of potentially odorous material if an odour is detected on-site or in very hot weather conditions. This will as a minimum be carried out daily at points around the site boundary shown on Drawing3925/701/03 and in the surrounding locality (when necessary) if it is established that there is an odour at the site boundary scoring 9 or above on the assessment form further checks will be made to quantify the odour and identify the source, on-site or off-site, if it is from an off-site source the most likely culprit will be identified and informed an odour is believed to be arising from their premises/activities.
- 5.2.2 If odour detected is arising on site further checks will be made at the site boundary and off site locations to determine the severity and extent of any odour. The scoring system shown in appendix II will be utilised and further actions triggered if a cumulative score of 9 or above is recorded or a single score of 5 is recorded in any of categories.
- 5.2.3 If a repeated complaint is made but there is no indication of odour on site the complainant will be requested to complete an odour diary (appendix II) to attempt to identify specific circumstances when odour may be being released. The odour diary once completed will be compared to records of on-site activities to pin point possible sources of odour for further investigation. Meteorological conditions such as the wind speed and direction at time of monitoring and external monitoring locations will be taken into account.

5.3 Odour Monitoring Procedure

- Olfactory (Sniff) testing will be carried out by trained; competent staff weekly or as necessary (please see Section 4.7 for information on training). Assessments will be carried out both routinely and in response to specific complaints/detection of odour.
- 5.3.2 The assessor will be a member of the office staff who does not work in the operational areas of the site routine tests will be undertaken at the start of a shift to ensure they have not become immune to any on-site odours. The Assessor should not:
 - a) Smoke or consume strongly flavoured food or drink for at least 30 minutes before the assessment.
 - b) Consume confectionary or soft drinks immediately before the assessment.
 - c) Apply scented toiletries, such as perfumes or aftershave immediately before an assessment.
- 5.3.3 Weekly assessments should be around the site close to or on the boundary at accessible points. If odour is detected at the boundary at an intensity of level 3 or above (see table in appendix 2 for details). Further checks need to be made outside the site as set out below.
- 5.3.4 Starting points of assessments outside the site should be downwind of the site as far as access and safety factors in the surrounding area allows, progressing towards the site boundary and then away from the site in an upwind direction. The person carrying out the assessment should walk slowly and breathe as normal. The assessment is scored on the form shown in appendix 2 according to 3 criteria: A Intensity, B Extent, C Location. If when adding these scores together a score of 9 or above is made or if A or B score 5 individually. Further monitoring of more distant areas close to sensitive receptors should be carried out and the actions outlined in section 6 undertaken.

5.4 Complaints Monitoring

5.4.1 All odour complaints will be recorded on the form found in Appendix II the first step will be to carry out immediate monitoring as described in section 5.3 above starting in the vicinity

of the originator of the complaint. If validated the actions outlined in section 6 will be undertaken.

5.4.2 Complaints to the Local Authority /EA will also be recorded and taken into account. An olfactory assessment survey will be carried out from where the complaint was made and from any convenient locations between the complainant/receptor and the site so that the complaint can be validated or rejected.

5.5 Odour Diaries

5.5.1 If members of the local community are frequently reporting odour issues in the vicinity, then they will be asked (if agreeable) to keep an odour diary. This will help to build up an account of when the odour occurs, their location and the site operations that were being carried out at the time, as well as the duration of the activities taking place. Any obvious problems can then be addressed.

6 CONTINGENCY PLANS

6.1 Contingencies and Emergency Plans

- 6.1.1 In accordance with Environment Agency's guidance on OMPs contingency plans have been prepared to react to situations 'where monitoring indicates that a potential odour source is not completely under control, meteorological conditions are unfavourable or that adverse impact has occurred'.
- 6.1.2 If a cumulative odour score above 9 is recorded or there is a an odour intensity score of 3 or above at the site boundary or a validated complaint is received, the following remedial procedures will be taken:
 - a) Firstly identify the odour source; is it from:
 - i) Site operations; or,
 - ii) An off-site source (e.g. other industrial sources)
 - b) If on site:
 - i) Report incidence to the site or technically competent manager;
 - ii) Identify the point of release of the odour;
 - iii) Identify the cause if the release i.e. machine breakdown/malfunction, hot weather, spillage, etc.;
 - iv) Identify a solution;
 - v) Implement a solution;
 - vi) Carry out olfactory tests to check if fix is working;
 - vii) Record actions taken on relevant forms and site diary as required by this plan
- 6.1.3 Then actions taken if odour is being produced on site will be:
 - a) Normal Operations: The offending odour will be traced and the reason for the cause of the problem will be investigated. Once solutions are in place, olfactory monitoring will be carried out to ensure the solutions put in place are having the desired effect.

b) Abnormal Conditions: Spillage or associated incident such as a fire.

Corrective Actions for Various Situations

6.2.1 Table 6.1 below summarises the various problems likely at the site and the standard responses available, which will assist in reducing odour potential.

Table 6.1 - Corrective Actions

Process	Problem	Corrective Action
Waste Loading/unloading	Accidental Spillage	Follow identified spillage procedure to contain odour release.
Stored wastes	Odorous emissions detected	Olfactory/SNIFF test required to pinpoint source. Ensure procedures outlined in Section 5 are adhered to in full. Implement contingency plans if score of 4 or above on intensity

6.3 **OMP Management**

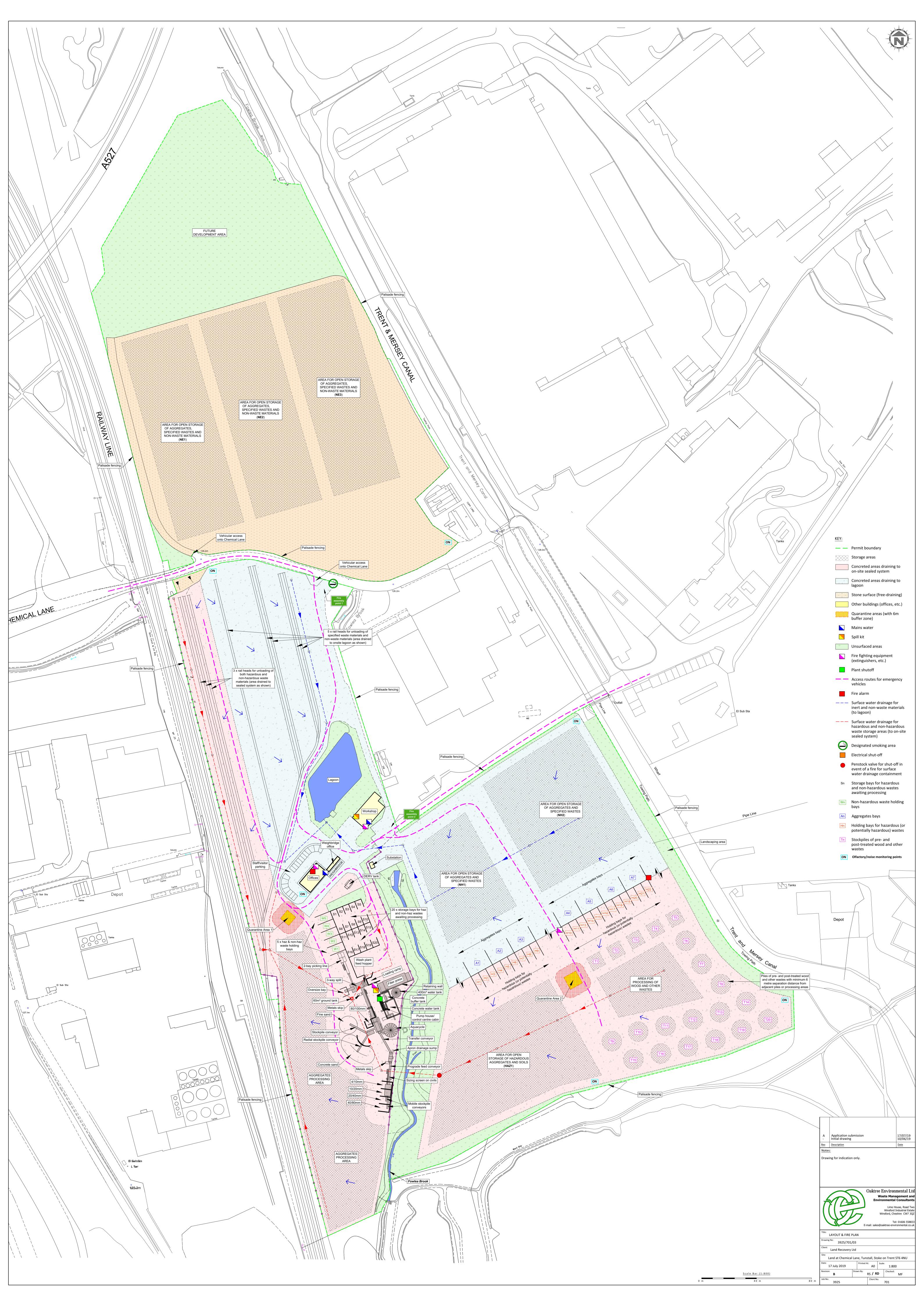
6.3.1 This OMP will be reviewed at least annually unless it becomes apparent that the activities are giving rise to pollution outside the site due to odour, in which case it will be revised within 7 days and a copy forwarded to the Environment Agency for approval before implementation.

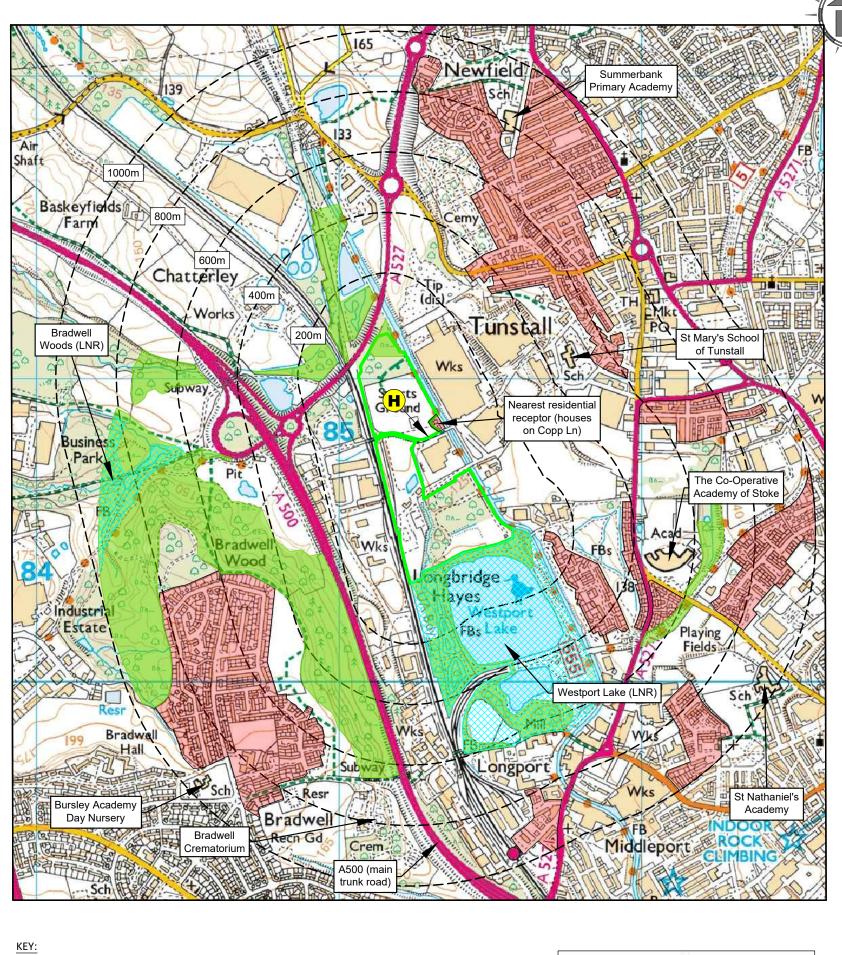
Appendix I

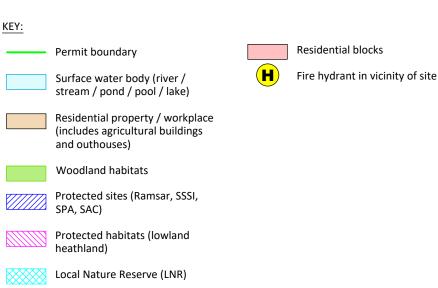
Drawings

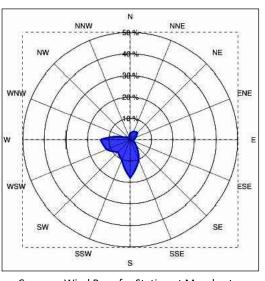
Drawing No. 3925/701/03 Site Layout Plan (with olfactory monitoring points)

Drawing No. 3925/701/04B Human Receptor Plan (includes wind rose Mcr Airport)









Compass Wind Rose for Station at Manchester Airport (EGCC) Period 2000-2010

Scale Bar (1:12,500)
0 m 500 m 1,000 m

Oaktree Environmental Ltd	Client: Land Recovery Ltd	<u> </u>
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E-mail: sales@oaktree-environmental.co.uk	18 July 2019	nted At: A3
Title: RECEPTORS PLAN	Scale: 1:12,500 Revision: _ Dra	awn By:
Drawing No: 3925/701/04	Client No: 701 Job No: 3925 Che	ecked:

Notes:	

- (1) Boundaries of designated sites (habitats and protected sites) are shown indicatively.
- (2) Wind rose data shows the prevailing wind direction to be South and West.

Revision Details:			
Rev:	Description:	Date:	
-	Initial drawing	18/07/19	

Appendix II

Record Forms

Odour Diary				Sheet No		
Name:		Address	:			
Telephone Number:						
Date of odour:						
Time of odour:						
Location of odour, if not at above address:						
Weather conditions (dry, rain, fog, snow etc):						
Temperature (very warm, warm, mild, cold or degrees if known):						
Wind strength (none, light, steady, strong, gusting):						
Wind direction (e.g. from NE):						
What does it smell like? How unpleasant is it? Do you consider this smell offensive?						
Intensity – How strong was it? (see below 1-5):						
How long did go on for? (time):						
Was it constant or intermittent in this period:						
What do believe the source/cause to be?						
Any actions taken or other comments:						

Intensity (Detectability)

- 1 No detectable odour
- 2 Faint odour (barely detectable, need to stand still and inhale facing into the wind)
- 3 Moderate odour (odour easily detected while walking & breathing normally)
- 4 Strong odour
- 5 Very strong odour (possibly causing nausea depending on the type of odour)

LAND RECOVERY LTD COMPLAINTS REPORT FORM (/RF/7)

Date Recorded:	Reference Number:
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
	Follow Up
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
	Recommendations
Change in procedures	
Changes to Environmental Management System (EMS)	
Date changes implemented	
Form completed by	
Signed	
Date completed	

COMPLAINT RECORDING PROCEDURE:

Any complaints received will be recorded on form /RF/7. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager will complete the form.

- 1) The name, address and telephone number of the caller will be requested.
- 2) Each complaint will be given a reference number.
- 3) The caller will be asked to give details of:
 - a) the nature of the complaint;
 - b) the time;
 - c) how long it lasted;
 - d) how often it occurs;
 - e) Is this the first time the problem has been noticed; and
 - f) what prompted them to complain.
- 4) The person completing the form will then, if possible, make a note of:
 - a) the weather conditions at the time of the problem (rain, snow, fog etc.);
 - b) strength and direction of the wind; and
 - c) the activity or activities taken place on the site at the time the noise was detected, particularly anything unusual.
- 5) The reason for the complaint will be investigated and a note of the findings added to the report.
- 6) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
- 7) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be invited to contact Environment Agency and or the Local Authority.

Note: Following any complaint the relevant management plan(s) will be reviewed to ensure appropriate actions are in place to counter any problems.

Land Recovery Ltd

3925/701/OASF

Olfactory Assessment Survey Form				Date:			
Weather conditions (dry, rain, fog, snow etc):							
Temperature (very warm, warm, mild, cold, or degrees if known)							
Wind strength (none, light, steady, strong, gusting) Direction (e.g.NE)							
Time of test							
Location of test e.g. street name point 1 below etc							
Duration (of test)							
A: Intensity (see below)							
B: Extent and scale (see below)							
C: Location sensitivity (see below)							
Total score							
Is the source evident? Y/N Comments below							
Comments or observation above.	ns (e.g. Ty	rpe of odou	ar, souce ic	lentified, o	n/off site)	If total sco	re is 9 or

Tables A: B: and C: Intensity, Extent and Location Sensitivity

A: Intensity

Scale	Odour Intensity & Description
0	No detectable odour
1	Faint odour (barely detectable, need to stand still and inhale facing into wind)
2	Faint to moderate (detectable when moving but not offensive))
3	Moderate odour (odour easily detected while walking and breathing normally, possibly
	offensive)
4	Strong odour (bearable, but offensive- will my clothes/hair smell?)
5	Very strong odour (this is when you really wish you were somewhere else

B: Extent

Scale	Odour Extent & Description
0	No odour detected
1	Local and intermittent (only detected during brief periods when wind drops or blows)
2	Low level but persistent (noticeable on a continuous basis)
3	Persistent, but fairly localised (reduces noticeably if move 10m from point of detection)
4	Persistent and widespread (reduces only when upto 50m from point of detection)
5	Persistent and widespread (odour reduces only when more than 50m from point of detection)

C: Location Sensitivity

Scale	Sensitivity of location & Description
0	No odour detected
1	Remote (no housing, commercial/industrial premises or public area within 500m)
2	Low sensitivity (within the site/building at least 5m from boundary/no housing etc within
	100m of area affected by odour)
3	Moderate sensitivity (adjacent to site boundary)
4	High sensitivity (housing, commercial/industrial premises or public within area affected by
	odour)
5	Extra sensitive (complaints arising from residents within area affected by odour)