Countrystyle Otterpool
Odour Management Plan
(Version 2, March 2024)

Odour Management Plan for Otterpool Waste Transfer Facility

1 Introduction

Countrystyle Recycling Limited (CRL) has retained SLR Consulting Limited (SLR) to prepare an Odour Management Plan (OMP) for the proposed Otterpool Waste Transfer Station (WTS) (the 'Facility'), located in Ashford, Kent, TN25 6DA (the 'Site').

The Facility will require an Environmental Permit (EP) to be issued by the Environment Agency (EA) before it can operate.

The Facility will undertake waste bulking and transfer operations only, managing up to 95,000 tonnes per annum (tpa) of non-hazardous mixed waste with a small proportion of that consisting of clinical waste (approximately 12,000 tpa) including nappies and sharps. The proposed activities at the Facility will include:

- R3: Recycling or reclamation of organic substances which are not used as solvents;
- R4: Recycling or reclamation of metals and metal compounds;
- R5: Recycling or reclamation of other inorganic materials; and
- R13: Storage pending recovery or disposal.

All waste will be stored in designated concrete bays or containers within a fully enclosed WTS building which will benefit from impermeable surfacing and a sealed drainage system throughout. All activities take place internally and therefore any potential odour emissions will be minimised.

Scope of Odour Management Plan

It is recognised that activities at the Facility may result in the release of fugitive odour emissions, which have the potential to diminish amenity in the local area.

Therefore, it is a requirement to control activities at the Facility in order to prevent or mitigate potential odours. The OMP provides a proactive approach to the effective management of odour during the Facility works and operation.

This OMP sets out the potential sources of odour at the Facility, the measures in place to control odour generation and monitor releases, and the management and monitoring actions that will be undertaken. The determination of receptor sensitivity and odour emission magnitude has been determined with reference to the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Odour for Planning[1].

The OMP is a 'live document', in this respect the odour control measures, and management procedures contained within it will be updated on a periodic basis. This OMP will be kept in the Facility office and be available to all employees. The OMP will be implemented throughout the duration of the Facilities' operation.

Key Guidance

In developing the OMP, key guidance documents that have been consulted include:

- Environment Agency (EA), H4 Odour Management Guidance[2];
- EA, OMP Template[3]; and
- IAQM, Guidance on the Assessment of Odour Impacts for Planning.

[1] Guidance on the Assessment of Odour for Planning, IAQM, July 2018.
[2] H4 Odour Management, How to comply with your environmental permit, Environment Agency, March 2011
[3] Odour Management Plan Template, Environment Agency, 'final v2'.

2 Baseline Environment

Location

The Site is situated between Hythe and Ashford, approximately 1km west of Newingreen village in Kent at the approximate National Grid Reference (NGR): x611230, y136600. The Site is set within an area predominantly comprising agricultural / open land and is bounded by:

- The A20 Ashford Road and a commercial/industrial premise to the north with commercial/industrial premises, open ground, and the East Stour River beyond;
- Otterpool Quarry Site of Special Scientific Interest (SSSI) open land to the east, with a number of residential properties along the A20 Ashford Road, further open / agricultural land and Red House Farm beyond;
- Otterpool Quarry SSSI open land to the south, with a residential property (Upper Otterpool), open / agricultural land and commercial properties beyond; and
- Open / agricultural land to the west with the B2067, further open / agricultural land and Otterpool Manor Farm beyond.

The Facility will be accessed via the A20 Ashford Road to the north of the Site. The Site location is illustrated in Figure A.

Other Potential Sources of Odour

A review of other potential sources of odour in the Site locale has been undertaken through use of aerial imagery.

There is potential for agricultural odours to arise from farming activities on the surrounding fields. Local receptors would be familiar with associated odours and be desensitised to them. The odour character would be markedly different to that from the Facility (i.e. waste odours).

Otterpool Manor Livery Stables is located 260m west of the Site and may be a source of localised animal / manure odour (i.e. similar in character to the local agriculture odours). This odour is only likely to impact upon the adjacent receptors (R2 and R3) who are regularly exposed to these odours and therefore be desensitised to them. The odour character would be markedly different to that from the Facility.

The Airport Café to the north of the Site may be a source of localised food / cooking odours. Given the scale of the café, odours from this café are considered unlikely to impact on other receptors. The odour character would be markedly different to that from the Facility.

On this basis odour emissions from other premises have not been considered within this OMP.

Sensitive Receptors

Human Receptors

Receptors in proximity to the Site with a sensitivity to odours have been identified and presented Table A. The closest residential properties to the Site are located 140m from the Site boundary. The sensitivity to of receptors to odours has been determined with reference to the IAQM odour Guidance. The closest human receptors considered to be sensitive to odour are presented and illustrated in Figure A.

Table A Sensitive Human Receptors

Receptor	Receptor Type	Receptor Odour Sensitivity	UK NGR (m)		Distance from Permit Boundary (m)
			X	Y	
R1	Commercial	Medium	611253	136686	15
R2	Residential	High	611014	136534	140
R3	Commercial	Medium	610988	136512	165
R4	Residential	High	611568	136659	220
R5	Residential	High	611589	136661	240
R6	Residential	High	611611	136661	260
R7	Residential	High	611033	136775	190
R8	Residential	High	611294	136265	220

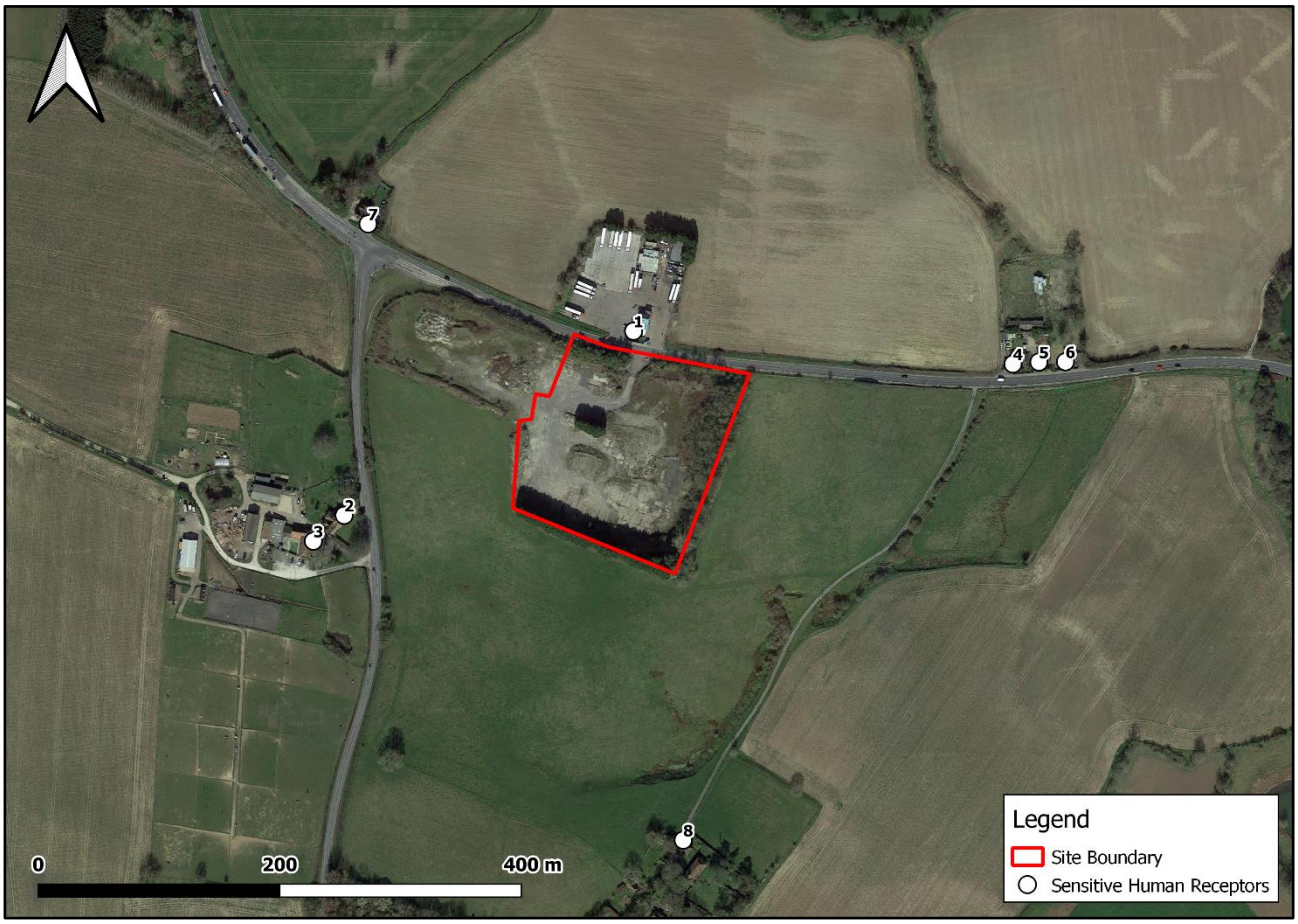

Figure A Site Setting in Relation to Sensitive Receptors

Meteorological Conditions

The most important climatic parameters governing the release and dispersal of fugitive odour emissions from the Facility are wind speed and direction:

- Wind direction determines the broad direction of dispersal; and
- Wind speed affects ground level concentrations by increasing the initial dilution of pollutants in the emission.

A wind rose for Lydd meteorological station (3-year average, 2016-2018 inclusive), located approximately 15.5km south of the Site is presented in Figure B. The wind rose shows winds from the southwest are most frequent (15% of the period presented). Therefore, locations to the northeast of the Site are most likely to be impacted by potential odour emissions.

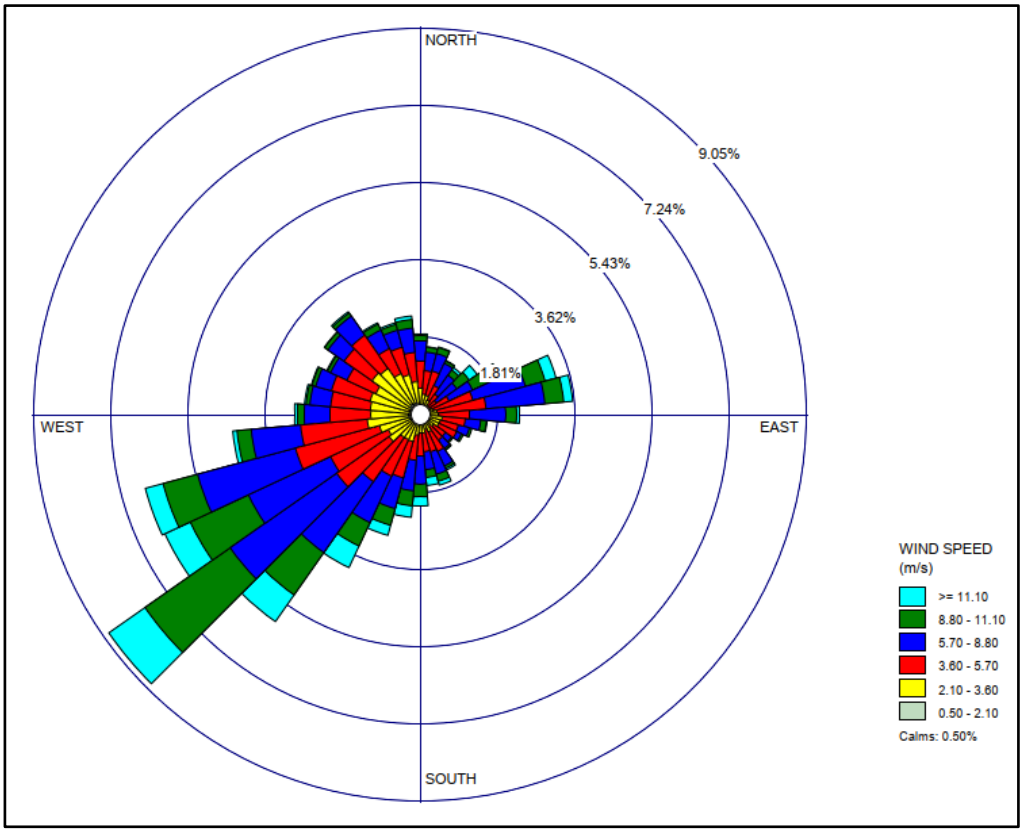

Figure B Wind Rose for Lydd Meteorological Station (2016-2018 Average)

3 Operations at Otterpool WTS

This section identifies the activities and potential odour sources at the Facility. The operational layout of the Facility is shown in Figure C.

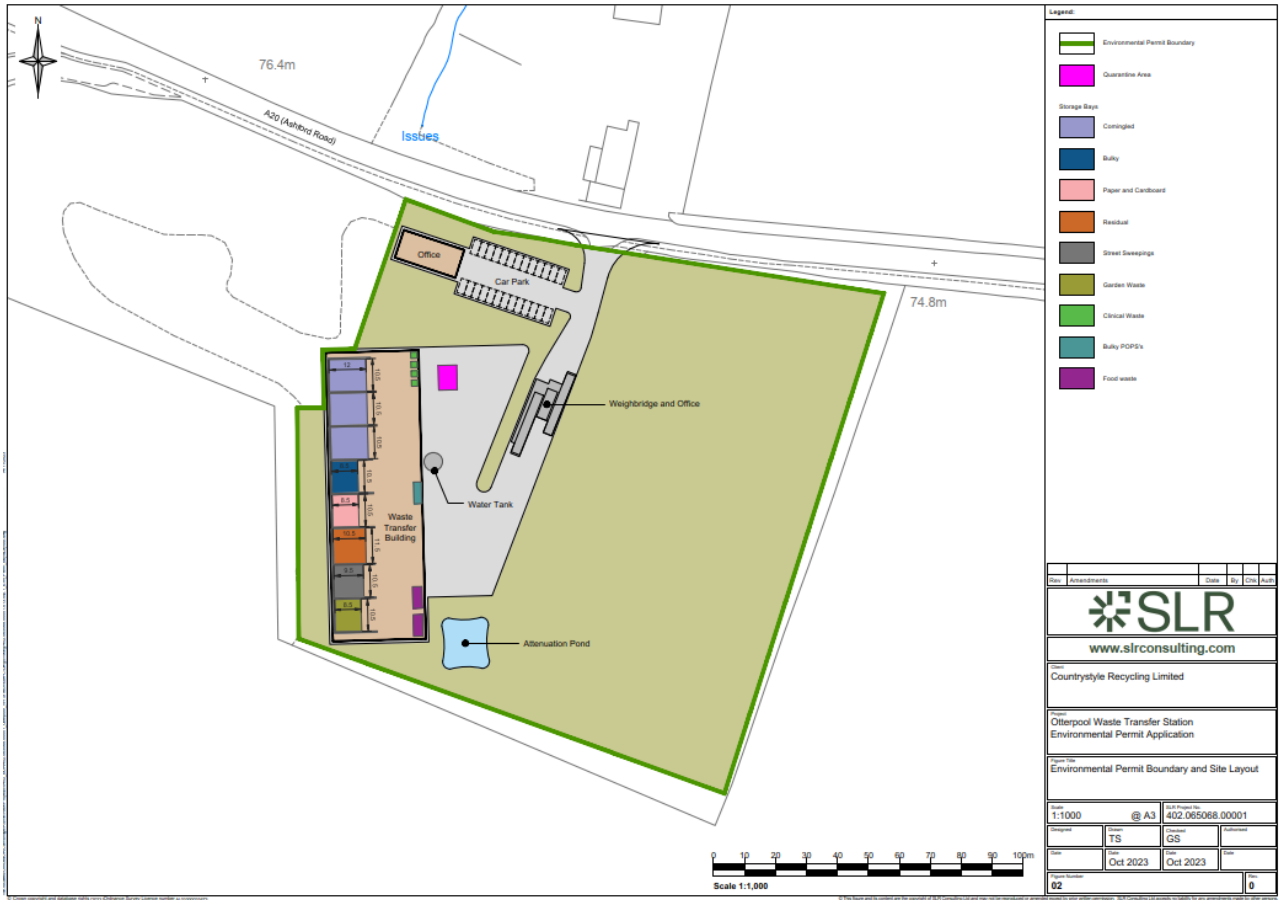

Figure C Proposed Layout

Site Operations

The Facility is designed to receive a variety of waste types, with limited manual sorting undertaken at the Facility prior to bulk removal. Wastes are delivered to the Facility in secure, steel sided lorries, skips and other vehicles. The Facility will accept approximately 95,000 Tonnes Per Annum (TPA) of waste, comprising of:

- Dry mixed recyclables;
- Clinical waste;
- Food waste;
- Green waste; and
- General waste.

The Facility is purely a storage and transfer site used to bulk up waste prior to transfer to a suitably permitted alternative facility for further recovery or disposal.

Hours of Operation

The Facility will be operational between 06:00 to 18:00 Monday to Sunday (excluding Christmas Day and New Years Day.

Waste Acceptance

A maximum of 300 tonnes of waste will be accepted per day. The Facility will accept predominantly non-hazardous mixed waste including co-mingled recyclable materials, bulky waste, paper and cardboard, residual waste, street sweepings, garden waste, clinical waste, and food waste. Whilst most of the waste has a low odour potential, it is recognised that clinical waste and food waste have a higher odour potential. Details of accepted waste and associated EU Waste Catalogue (EWC) Codes are presented in full in Appendix A.

Storage

A maximum of 1,500 tonnes of waste will be stored on site at any one time. All waste will be stored in designated concrete bays or containers within the fully enclosed WTS building which will benefit from impermeable surfacing and a sealed drainage system. Clinical waste types will be kept segregated from the other wastes streams at all times and stored within enclosed containers. A maximum of 50 tonnes of clinical waste will be stored on site at any one time.

Due to the type of inputs, it is expected the bulk of wastes will be evenly spread throughout the year apart from green waste which will be seasonal. All waste will be stored for a maximum of 5 days (typically removed every 2-3 days) prior to transfer off site to a suitably permitted alternative facility for further recovery or disposal.

The quantity of stored waste will be monitored against the allowed maximum capacities. This will be calculated by recording the volume of waste entering the site and the application of standard EA conversion factors as appropriate or via a weighbridge.

Good housekeeping measures (as outlined in Table C) would ensure that stockpiles are suitably managed to stay within the designated bays.

All waste storage containers and bays within the WTS building will be clearly labelled to ensure the segregation of waste.

Odour masking sprays will be fitted within the WTS building.

On-Site Transportation / Material Handling

There would be periodic vehicle movements along the hard-standing areas of the Site during operational hours. Vehicle movements would arise from waste import, handling, stockpiling and export operations. The vehicle movements at the Facility would be primarily as a result of refuse collection vehicles (RCVs) and street cleaning caged vans / tippers importing or exporting waste, as well as mobile plant in operation for handling and stockpiling operations.

Off-Site Transportation / Import and Export Operations

There would be periodic vehicle movements to/from the Facility on to the local road network during operational hours. Vehicles entering/leaving the Facility to/from the local road network would arise as a result of waste import/export operations. The vehicle entering/leaving the Site would typically comprise RCVs and street cleaning caged vans / tippers.

The areas of the Facility which would be accessed by the RCVs and street cleaning caged vans / tippers accessing the Site would be hard paved. RCVs and tippers transferring material to / from the Facility shall be covered (contained or sheeted) where possible.

4 Potential Odour Sources and Magnitude

In order to consider the likely significance of effects of potential odours arising from the Facility operations upon nearby sensitive receptors it important to consider the following:

- Source: i.e. magnitude of release;
- Pathway: i.e. the prevailing meteorological conditions and distance / direction of receptors in relation to the facility; and
- Receptors: i.e. the sensitivity of receptors to potential odours.

Further details on the source, pathway and receptors (SPR) are outlined within the sections below.

Source

The application of good working practices and process control is of fundamental importance in eliminating and minimising the quantities of odours formed at the Facility and their subsequent release to atmosphere. This section provides an inventory of all potential odour sources under the full range of normal operating conditions.

The overall aim in the operation of the Facility is to apply Best Available Techniques (BAT) at all stages of operations. For this reason, the Facility is operated and managed in accordance with the accepted hierarchy of preferred controls, that is:

1. Prevent the formation or emission of odorous compounds in the first place;
2. Where this is not practicable, minimise the release of odour;
3. Abate excessive emissions; then
4. Dilute any residual odour by effective dispersion in the atmosphere.

Potential odour sources associated with the operation of the Facility have been identified in consideration of the Facility operations. The key potential odour sources identified at the Facility are as follows:

- Mixed municipal waste
- Clinical waste;
- Food waste; and
- Green waste.

In consideration of the key odour sources (as identified above) and in adoption of a precautionary approach, the source odour potential of the Facility operations is considered ‘small’. Further details on the specific odour sources identified are outlined in the sections below.

Mixed Municipal Waste

Mixed municipal waste has the potential to be moderately or highly offensive with a likely odour character of a rotting/putrid nature, i.e. garbage/rubbish, rotten eggs or organic/compost (decayed). The odour potential is dependent on the material, state of material decomposition upon arrival at as well as the quantity in storage and the time stored prior to off-site export. Given food waste is collected separately, the mixed municipal waste is likely to be less co-mingled and the odour potential is considered to be reduced.

Mixed municipal waste would be deposited, stored and loaded for export within an enclosed building, thus providing a level of containment to odours. Further, as detailed in Section 5 Control Measures and Process Monitoring, the waste will be retained for a limited time and the WTS building shall use utilise odour masking sprays. As such, the associated odour potential of mixed municipal waste at the Facility is considered ‘small’.

Clinical Waste

Clinical waste has the potential to be moderately or highly offensive with a wide variety of odour characters The odour potential and character is dependent on the type of waste present and the state of material decomposition upon arrival. Typical anticipated odour characters will be chemical /solvent based (i.e. alcohol/medicinal, sweet (esters), sour/acidic, paint (acetone)), rotting/putrid based (i.e. garbage/rubbish, septic, decayed) or animal origin based (i.e. blood, manure/faecal)

Clinical waste will be kept segregated from other waste streams at all times and stored within an enclosed containers within the enclosed WTS building, thus providing a level of containment to odours. Clinical waste will be stored for a maximum of five days before being moved on. As such, the odour potential of clinical waste at the Facility is considered 'small'.

Food Waste

Food waste, which has the potential to be moderately or highly offensive with a likely odour character of a rotting/putrid nature (i.e. rotten eggs, dairy (rancid), dead animal (rotten)) and animal origin based (i.e. fishy, poultry). The odour potential is dependent on the state of material decomposition upon arrival as well as the quantity in storage and the time stored prior to off-site export.

Food waste would be deposited and stored within a dedicated enclosed containers within the enclosed WTS building, thus providing a level of containment to odours. The food waste would then be moved onto anaerobic digestion (AD) plants normally within 36 hours to minimise odour. Given the above, the associated odour potential of food waste at the Facility is considered 'small'.

Green Waste

Green waste, which has the potential to produce slightly offensive odours with a typical 'grassy' or 'musty' character. The odour potential is dependent on the state of material decomposition upon arrival at Facility as well as the quantity in storage and the time stored prior to off-site export.

Green waste would be deposited and stored within a dedicated bay and moved off Site normally within 48 hours and always within five days. The bay will be fully cleared before refilling. In consideration of the similarity of green waste odours to those currently present within the site setting (agricultural), the sensitivity of nearby residential receptors to green-waste type odours is likely to be low.

As such, the associated odour potential of green waste at the Facility is considered 'small'.

Pathway

The pathway by which odours may impact upon receptor locations is a result of atmospheric dispersion. In general, high wind speeds lead to emitted odour being rapidly dispersed and diluted due to turbulence, and conversely low wind speeds inhibit the dilution of odours.

Prevailing wind directions are considered in assessing the likelihood and management of emission risks. In consideration of the local meteorological conditions, prevailing wind in the Site locale are anticipated to be from the southwest. Consequently, the potential impact of emissions is likely to be greater to the northeast of the Site.

Wind speed analysis for Lydd meteorological station show that low wind speeds (i.e. <5m/s) at Lydd meteorological station have been observed for approximately 45% of the hours between 2016-2018. In consideration of the frequent low wind speeds, low level releases, the resulting dispersion and dilution of odours is considered to be reduced.

Nearby high sensitivity receptors (see Table A) are located at a distance of more than 140m from the Site boundary and are considered relatively remote to the potential odour sources identified.

Receptor

Potentially sensitive receptor locations for odour are typically defined as locations where people spend time and expect a reasonable level of amenity. Therefore, residential properties are regarded as receptors of high

sensitivity while commercial properties are generally regarded as receptors of medium sensitivity and public areas (i.e. footpaths, carparks) as low sensitivity. Sensitive human receptors considered are presented in Table A, whilst their locations are illustrated in Figure A.

Significance of Effects

The Source-Pathway-Receptor (S-P-R) conceptual model outlined within the IAQM Odour Guidance has been used to assess the likely odour effect as a result of potential odours arising from operations from the Facility at the nearest sensitive receptors.

A summary of the SPR and associated significance of effects on the identified sensitive receptors is presented in Table B.

Table B SPR Summary

Receptor ID	Receptor Type	Receptor Sensitivity	Source Odour Potential	Pathway Effectiveness	Odour Exposure	Likely Odour Effect
R1	Commercial	Medium	Small	Highly Effective	Low Risk	Negligible Effect
R2	Residential	High	Small	Ineffective	Negligible Risk	Negligible Effect
R3	Commercial	Medium	Small	Ineffective	Negligible Risk	Negligible Effect
R4	Residential	High	Small	Moderately Effective	Negligible Risk	Negligible Effect
R5	Residential	High	Small	Moderately Effective	Negligible Risk	Negligible Effect
R6	Residential	High	Small	Moderately Effective	Negligible Risk	Negligible Effect
R7	Residential	High	Small	Ineffective	Negligible Risk	Negligible Effect
R8	Residential	High	Small	Ineffective	Negligible Risk	Negligible Effect

As shown in Table B, the likely odour effect at all considered sensitive receptors is negligible. Notwithstanding this, a range of odour control measures are proposed to further control and reduce potential odours from the Facility operations. These are summarised in Section 5 Control Measures and Process Monitoring.

5 Control Measures and Process Monitoring

The odour control measures employed at the Facility are detailed in Table C.

Table C Appropriate Techniques / BAT

Potentially Odorous Process / Material	Control measures (Appropriate Measure / BAT)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level
Waste Reception	Waste rejection procedure	Constant, ongoing throughout shift.	All waste received at the Site is monitored at entry (report to a weighbridge) to ensure compliance with the permitted waste types for the facility. Any abnormal loads are rejected. Highly odorous loads identified are directed to the front of the queue for tipping (to reduce residence time outside of the main building).	Abnormal or highly odorous loads identified.
	Containment of food waste odour sources		All vehicles delivering or collecting food waste shall be sheeted or have sealable containers, which will not be opened until inside.	Visual Inspection
	Use of the vehicular access doors		Fast-acting roller shutter doors will be installed on the WTS building and kept closed during tipping and unloading of waste.	Vehicular access door open, but not in use.
Storage of Waste	Containment of odour sources - general	Constant, ongoing throughout shift. A daily record of tonnage in and out of the entire site is maintained. Inspected weekly to ensure there is no loss of containment.	Waste storage and handling operations are undertaken within the main WTS building. This building is enclosed, thereby reducing fugitive odour emissions.	N/A
			All waste storage containers and bays within the WTS building will be clearly labelled to ensure the segregation of waste. A maximum of 1,500 tonnes of waste will be stored on site at any one time.	Label missing
	Containment of odour sources – food waste		Food waste will be stored in enclosed containers within dedicated bays. No more than 50 tonnes of food waste will be stored at any one time before being removed for anaerobic digestion (AD) plants.	N/A
	Containment of odour sources –clinical waste		Clinical waste will be stored in enclosed containers within dedicated bays.	Non-compliance

			No more than 50 tonnes of clinical waste (primarily EWC 18 01 04) will be stored on site before being removed for recovery. Sharps (primarily EWC 18 01 01) will be stored within specified sharps containers. All other wastes will be bulked up and moved offsite on a regular basis, following the FIFO principles.	
	Containment of odour sources – green waste		Up to 100 tonnes of green waste will be stored within the building at any one time & will be managed as per First In, First Out (FIFO) principles.	N/A
	Use of the vehicular access doors		Fast-acting roller shutter doors will be installed on the WTS building and kept closed when not in use, where possible.	Vehicular access door open, but not in use.
	Minimising of retention time		The length of time waste is stored at the site is minimised – waste will be on site for a maximum 5 days. Food waste will typically be removed within 36 hours. Green waste will typically be removed within 48 hours	N/A
	Good housekeeping	Daily Weekly	Storage areas will benefit from daily cleaning using brooms. Storage areas will benefit from weekly cleaning using hoses.	N/A
	Masking Odours	N/A	Odour masking sprays will be fitted within the WTS building.	N/A
	Backup Machines	Daily	In case of machine breakdown alternative machines can quickly be supplied as Countrystyle own a large fleet. Therefore, no onsite delays to waste handling is anticipated.	Machine breakdown
Spillage	Good housekeeping	Constant, ongoing throughout shift.	Any spilalges will be cleared and logged in the site diary immediately.	Spillage
Litter across Site	Litter picking / good housekeeping.	Constant, ongoing throughout shift.	Periodic litter picking is undertaken around the Site as required to keep litter levels low. Good housekeeping practises are encouraged.	Excessive levels of litter around the Site.

6 Monitoring and Maintenance

Monitoring of process controls, odour containment, odorous releases, and dispersion pathways are as described in the sections below.

Monitoring of Ambient Odours

Monitoring ambient odour provides a broad indication of the effectiveness of the odour management as a whole, i.e. odour minimisation, containment, treatment and dispersion. This is a reactive process and should be considered as a final indicator of odour control effectiveness.

The assessment is “sensory” in that the human noise is used as the detector – a sound approach considering that no analytical instrument can give a unified measure of a complex mixture of compounds in the same way that a human experiences odour.

Sniff-testing is employed for the following reasons:

- as part of a survey at the Site boundary during normal operations, to confirm the effective performance of odour control measures in place;
- at the Site boundary during periods of adverse meteorological conditions, breakdowns or during other abnormal events to evaluate the effectiveness of the control measures in place and the likelihood that odour complaints will be received; and
- in the event that complaints are received, at the locations of sensitive receptors as part of the complaint investigation procedure.

‘Sniff-tests’ will follow the procedure detailed within Appendix D as set out within the H4 Odour Guidance and will be undertaken periodically if odour complaints are received.

Control Measures during Routine Maintenance

The facility will have no need for planned maintenance shutdown; typically, individual pieces of equipment will be able to be isolated from the process to allow for service / maintenance.

During necessary maintenance works, there is the potential that the facility is more vulnerable or a risk of a small odour release (e.g. replacing or repairing a roller door).

Monitoring Meteorological Conditions

If odour complaints are received the Site Manager or other designated responsible person will record daily weather conditions in the Site Diary from online data sources (i.e. local forecast), including wind direction, wind speeds and ambient temperatures.

The recording of meteorological data can also be an effective management tool when used for the following:

- during routine operations, to plan where boundary monitoring should be focussed to assess odour impacts;
- at the time of abnormal events (i.e. breakdown) to predict where odour impacts could potentially occur; and
- in the investigation of odour complaints or to verify community observations.

Recording of Results and Reporting

Odour

All waste received at the Site is monitored at entry (report to a weighbridge) to ensure compliance with the permitted waste types for the facility and to identify any particularly dusty loads.

Daily records are maintained and include the following details (where applicable):

- results of inspections and any olfactory monitoring carried out by site personnel;
- operational problems including date, time, duration and cause of problem;
- complaints received including address (if available); and
- details of corrective actions taken and any subsequent changes to operational procedures.

The weekly sniff-tests undertaken will be made on the Odour Monitoring Form presented in Appendix B which will be filed and kept on site for inspection by the EA as and when required.

In the event that odour is detected at the Site boundary, this will be noted in the Site diary and the Site Manager (or any appointed representative) will be informed to allow for appropriate steps to be taken to mitigate the odour.

Notifying EA

In the event that an accident or incident occurs, the Operator will notify the EA as soon as practicably possible using the emergency 24hr phone line (0800 870060). The Site Manager for the facility will also notify the Regulatory Officer should any complaints be received directly to the Site and advise what remedial measures have been undertaken. Copies of any complaints will be made available for EA to review

7 Contingencies

In accordance with H4 Odour Guidance on OMPs, where observations indicate odour pollution is occurring (i.e. monitoring indicates that a potential odour source is not completely under control, or that adverse impact has occurred) the operator will be required to take appropriate contingency measures.

This includes accidents (or incidents) which would result in the loss of control of odorous substances and have the potential to cause an unacceptable short-term impact on the local community but are not considered an emergency situation.

Foreseeable Events

Table D below outlines some of the foreseeable 'abnormal events' which might occur at the Site and the associated contingencies and recovery steps to address these events.

Table D Foreseeable Events

Abnormal event	Recovery steps
Power Failure	In the event of power failure, operations would be suspended, and all external doors would be closed manually.
	During a power failure, further waste deliveries would not be received at the Site. Where possible waste deliveries would be diverted to other sites.
Damage to Vehicular access door	Engage with contractors to undertake remedial actions as soon as possible.
Flood	As per the Operating Techniques and Waste Acceptance Procedures document, the Site is considered to be at a low risk of flooding, however if the Site becomes flooded this would inhibit waste reception and processing operations. In the event of flooding municipal and food waste will be rapidly removed from the Facility, where possible. Widespread flooding of the Facility may also prevent the operation of key electrical equipment and vehicular access. Under such extreme conditions no further operations would be undertaken (i.e. opening of doors) and no further waste would be received. Widespread flooding may prevent access to Facility. In such a situation could not be received or exported from the Facility.
Staff Shortage	If long-term staff shortage (or a prolonged and widespread period of staff absence) occurs the operator would cease receiving deliveries of waste and suspend Facility operations.
Extreme cold / snowfall	Employ snow clearing equipment. Divert incoming waste streams where feasible.

In the event of Site emergency, an assessment will be made to determine whether the incident has the potential for off-Site environmental impacts and the Operations Director or Operations Manager will be notified in line with the categorisation criteria without delay and the Site's Incident Response Plan will be followed.

Detection of Odour in Response to Received Complaints

Where odour complaints are received, olfactory surveys will be undertaken (as detailed in Appendix D) and the likely source or sources of odours identified by determining the sources of greatest odour intensity.

Contingency actions would then be implemented as identified above. All information regarding action taken shall be recorded on the external odour assessment form (Appendix B).

The olfactory surveys will be repeated on consecutive days after initiation of corrective actions, until odour has reduced to an acceptable level and odour complaints are no longer received.

The EA will be informed in line with Permit requirements.

Out of Hours Contact Details

An Emergency Duty Standby Number will be made available which will always be answered in the event of an emergency.

Receipt of an Odour Complaint

Complaint Logging

All complaints will be recorded on an Odour Complaint Form such as that presented in Appendix C and forwarded onto the Site's EA Officer. Information that will be recorded will include the following:

- date and time of odour complaint and odour detection;
- location / address of complainant (where provided); and
- a description of the odour from the complainant (where provided).

Following an odour complaint, a trained member of staff will undertake an olfactory survey (as detailed in Appendix D), recording the results on an Odour Monitoring Form (see Appendix B). If an odour is encountered during the survey (which would reasonably be linked to the Facility operations), the source will be investigated by Facility management and the outcome recorded.

Investigations will include the likely source and cause of the odour and a review of the meteorological data. Suitable remedial action will be instigated, where required. The complainant will be informed of any action taken and all actions will be recorded.

Should no odour be observed, a record of the monitoring survey will be made, the meteorological conditions checked, a report would be provided to the EA and suitable feedback provided to the complainant.

Complaint Investigation

The following actions will be taken on receipt of an odour complaint:

1. The Site Manager (or any appointed representative) will be informed of the odour complaint as soon as possible, including the location, time and date (if reported) of the complaint being lodged;
2. The Site Manager (or any appointed representative) will undertake the following assessment process:
    - review of the site operations prior to and at the time of the complaint to include;
        - if waste was being received in waste reception areas (including the tip off bunker and storage tanks) at the time of the complaint;
        - if highly odorous waste was being treated at the time of the complaint;
        - if any abnormal operating conditions occurring;
        - if any accidents or incidents requiring contingency actions were being undertaken; and
        - if any emergency situations existed at the time.

- review of the meteorological conditions (wind speed and direction) prior to and at the time of the complaint, to establish whether a pathway can be established between the site and the complainant; and
- review the previous history of complaints at the location identified.

3. The Site Manager (or appointed representative) will visit the complaint location as soon as is possible in order to subjectively determine odour presence / absence. If an odour is determined to be present, odour characteristics and intensity would be determined (in accordance with the procedure detailed in Appendix D) and a complaint form completed (see Appendix C).
4. The EA will be informed in line with Permit requirements.

8 Document Updates and Reviews

Responsible Staff

The Site has a well defined and formally documented management structure managing the impacts.
It is the responsibility of every manager/supervisor, with the support of the environmental professionals, to identify environmental risks that are relevant to the Facility and determine if a particular activity or service is environmentally significant.

Once identified, it is the responsibility of the Facility Manager (or any appointed representative) to highlight the significant aspects to all relevant employees and contractors. The Facility Manager (or any appointed representative) is also responsible for monitoring and managing all activities under SBL's control to improve environmental performance.

Work instructions, job descriptions and procedures exist for critical areas of the Site activities and have been issued to or made available to personnel responsible for undertaking these tasks.

General Procedures for Training and Competency of Staff

Staff competency and the need for training is continually assessed by the Site Manager (or any appointed representative) and under all circumstances will be reviewed (at least) annually and formally recorded.

Odour Management Plan Review

This OMP is a controlled document, and forms part of the EMS. A comprehensive record of the results of the monitoring and inspection programme contained within this OMP will also form part of the EMS.

The specification for the periodic review and update of the OMP will be set out within the Site Management System. In line with the recommendations of the H4 Odour Guidance, this takes place on an annual basis, as a minimum.

However, the OMP is intended to be a live document which serves as a reference during daily operations, and as such would be updated on a more frequent basis should the following occur:

- significant changes are made to the plant or operational practices;
- there is a change to the management structure, designation of responsibility or training provision;
- the EA requests that the OMP is updated, in their role as regulator; or
- complaints are received, which on subsequent investigation result in the identification of further control measures or remedial action, in addition to those set out within this OMP.

Appendix A EU Waste Catalogue (EWC) Codes

Table E Proposed Non-Hazardous Waste Types to be Accepted at the Site

EWC Code	Description
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 01	Wastes from mineral excavation
01 01 01	Wastes from mineral metalliferous excavation
01 01 02	Wastes from mineral non-metalliferous excavation
01 03	Wastes from physical and chemical processing of metalliferous minerals
01 03 06	Tailings other than those mentioned in 01 03 04 and 01 03 05
01 03 09	Red mud from alumina production other than the wastes mentioned in 01 03 07
01 04	Wastes from physical and chemical processing of non-metalliferous minerals
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	Waste sand and clays
01 04 11	Wastes from potash and rock salt processing other than those mentioned in 01 04 07
01 04 12	Tailings and other wastes from washing and cleaning of minerals other than those mentioned in 01 04 07 and 01 04 11
01 04 13	Wastes from stone cutting and sawing other than those mentioned in 01 04 07
02	WASTES FROM AGRICULTURE HORTICULTURE AQUACULTURE FORESTRY HUNTING AND FISHING FOOD PREPARATION AND PROCESSING
02 01	Wastes from agriculture, horticulture, forestry, hunting and fishing
02 01 03	Plant-tissue waste
02 01 04	Waste plastics (except packaging)
02 01 07	Wastes from forestry
02 01 10	Waste metal
02 02	Wastes from the preparation and processing of meat, fish and other foods of animal origin
02 02 03	Materials unsuitable for consumption or processing
02 03	Wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation
02 03 04	Materials unsuitable for consumption or processing
02 04	Wastes from sugar processing
02 04 01	Soil from cleaning and washing beet
02 04 02	Off-specification calcium carbonate
02 05	Wastes from the dairy products industry

EWC Code	Description
02 05 01	Materials unsuitable for consumption or processing
02 06	Wastes from the baking and confectionery industry
02 06 01	Materials unsuitable for consumption or processing
02 06 02	Wastes from preserving agents
02 07	Wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea, and cocoa)
02 07 01	Wastes from washing, cleaning and mechanical reduction of raw materials
02 07 02	Wastes from spirits distillation
02 07 04	Materials unsuitable for consumption or processing
03	WASTES FROM WOOD PROCESSING, AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD
03 01	Wastes from wood processing and the production of panels and furniture
03 01 01	Waste bark and cork
03 01 05	Sawodour, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
03 03	Wastes from pulp, paper and cardboard production and processing
03 03 01	Waste bark and wood
03 03 07	Mechanically separated rejects from pulping of waste paper and cardboard
03 03 08	Wastes from sorting of paper and cardboard destined for recycling
03 03 10	Fibre rejects, fibre-, filler- and coating-sludges from mechanical separation
04	WASTES FROM THE LEATHER, FUR AND TEXTILE INDUSTRIES
04 01	Wastes from the leather and fur industry
04 01 08	Waste tanned leather (blue sheetings, shavings, cuttings, buffing odour) containing chromium
04 01 09	Wastes from dressing and finishing
04 02	Wastes from the textile industry
04 02 21	Wastes from unprocessed textile fibres
04 02 22	Wastes from processed textile fibres
06	WASTES FROM INORGANIC CHEMICAL PROCESSES
06 09	Wastes from the MSFU of phosphorous chemicals and phosphorous chemical processes
06 09 02	Phosphorous slag
06 09 04	Calcium-based reaction wastes other than those mentioned in 06 09 03
06 11	Wastes from the manufacture of inorganic pigments and opacifiers
06 11 01	Calcium-based reaction wastes from titanium dioxide production
07	WASTES FROM ORGANIC CHEMICAL PROCESSES
07 02	Wastes from the MFSU of plastics, synthetic rubber and man-made fibres

EWC Code	Description
07 02 13	Waste plastic
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY
09 01	Wastes from the photographic industry
09 01 07	Photographic film and paper containing silver or silver compounds
09 01 08	Photographic film and paper free of silver of silver compounds
09 01 10	Single-use cameras without batteries
09 01 12	Single-use cameras containing batteries other than those mentioned in 09 01 11
10	WASTES FROM THERMAL PROCESSES
10 01	Wastes from power stations and other combustion plants (except 19)
10 01 01	Bottom ash, slag and boiler odour (excluding boiler odour mentioned in 10 01 04)
10 01 05	Calcium-based reaction wastes from flue-gas desulpherisation in solid form
10 01 07	Calcium-based reaction wastes from flue-gas desulpherisation in sludge form
10 01 15	Bottom ash, slag and boiler odour from co-incineration other than those mentioned in 10 01 14
10 01 19	Wastes from gas cleaning other than those mentioned in 10 01 05, 10 01 07 and 10 01 18
10 01 24	Sands from fluidised beds
10 02	Wastes from the iron and steel industry
10 02 01	Wastes from the processing of slag
10 02 02	Unprocessed slag
10 02 08	Solid wastes from gas treatment other than those mentioned in 10 02 07
10 02 10	Mill scales
10 02 14	Filter cakes from gas treatment other than those mentioned in 10 02 13
10 02 15	Other filter cakes
10 03	Wastes from aluminium thermal metallurgy
10 03 02	Anode scraps
10 03 05	Waste alumina
10 03 16	Skimmings other than those mentioned in 10 03 15
10 03 18	Carbon-containing wastes from anode manufacture other than those mentioned in 10 03 17
10 03 24	Solid wastes from gas treatment other than those mentioned in 10 03 23
10 03 26	Filter cakes from gas treatment other than those mentioned in 10 03 25
10 03 28	Wastes from cooling-water treatment other than those mentioned in 10 03 27
10 03 30	Wastes from treatment of salt slags and black drosses other than those mentioned in 10 03 29
10 04	Wastes from lead thermal metallurgy
10 04 10	Wastes from cooling-water treatment other than those mentioned in 10 04 09

EWC Code	Description
10 05	Wastes from zinc thermal metallurgy
10 05 01	Slags from primary and secondary production
10 05 09	Wastes from cooling-water treatment other than those mentioned in 10 05 08
10 05 11	Dross and skimmings other than those mentioned in 10 05 10
10 06	Wastes from copper thermal metallurgy
10 06 01	Slags from primary and secondary production
10 06 02	Dross and skimmings from primary and secondary production
10 06 10	Wastes from cooling-water treatment other than those mentioned in 10 05 10
10 07	Wastes from silver, gold and platinum thermal metallurgy
10 07 01	Slags from primary and secondary production
10 07 02	Dross and skimmings from primary and secondary production
10 07 03	Solid wastes from gas treatment
10 07 05	Filter cakes from gas treatment
10 07 08	Wastes from cooling-water treatment other than those mentioned in 10 07 07
10 08	Wastes from other non-ferrous thermal metallurgy
10 08 09	Other slags
10 08 11	Dross and skimmings other than those mentioned in 10 08 10
10 08 13	Carbon-containing wastes from anode manufacture other than those mentioned in 10 08 12
10 08 14	Anode scrap
10 08 18	Filter cakes from flue-gas treatment other than those mentioned in 10 08 17
10 08 20	Wastes from cooling-water treatment other than those mentioned in 10 08 19
10 09	Wastes from casting of ferrous pieces
10 09 03	Furnace slag
10 09 06	Casting cores and moulds which have not undergone pouring other than those mentioned in 10 09 05
10 09 08	Casting cores and moulds which have undergone pouring other than those mentioned in 10 09 07
10 09 14	Waste binders other than those mentioned in 10 09 13
10 09 16	Waste crack-indicating agent other than those mentioned in 10 09 15
10 10	Wastes from casting of non-ferrous pieces
10 10 03	Furnace slag
10 10 06	Casting cores and moulds which have not undergone pouring, other than those mentioned in 10 10 05
10 10 08	Casting cores and moulds which have undergone pouring, other than those mentioned in 10 10 07
10 10 14	Waste binders other than those mentioned in 10 10 13

EWC Code	Description
10 10 16	Waste crack-indicating agent other than those mentioned in 10 10 15
10 11	Wastes from manufacture of glass and glass products
10 11 03	Waste glass-based fibrous materials
10 11 10	Waste preparation mixture before thermal processing, other than those mentioned in 10 11 09
10 11 12	Waste glass other than those mentioned in 10 11 11
10 11 16	Solid wastes from flue-gas treatment other than those mentioned in 10 11 15
10 11 18	Filter cakes from flue-gas treatment other than those mentioned in 10 11 17
10 12	Wastes from manufacture of ceramic goods, bricks, tiles and construction products
10 12 01	Waste preparation mixture before thermal processing
10 12 05	Filter cakes from gas treatment
10 12 06	Discarded moulds
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)
10 12 10	Solid wastes from gas treatment other than those mentioned in 10 12 09
10 12 12	Wastes from glazing other than those mentioned in 10 12 11
10 13	Wastes from the manufacture of cement, lime, and plaster and articles and products made from them
10 13 01	Waste preparation mixture before thermal processing
10 13 04	Wastes from calcination and hydration of lime
10 13 07	Filter cakes from gas treatment
10 13 10	Wastes from asbestos-cement manufacture other than those mentioned in 10 13 09
10 13 11	Wastes from cement-based composite materials other than those mentioned in 10 13 09
10 13 13	Solid wastes from gas treatment other than those mentioned in 10 13 12
10 13 14	Waste concrete
11	WASTES FROM CHEMICAL SURFACE TREATMETN AND COATING OF METALS AND OTHER MATERIALS; NON-FERROUS HYDRO METALLURGY
11 01	Wastes from chemical surface treatment and coating of metals and other materials (for example galvanic processes, zinc coating processes, pickling processes, etching, phosphating, alkaline degreasing, anodising)
11 01 10	Filter cakes other than those mentioned in 11 01 09
11 01 14	Degreasing wastes other than those mentioned in 11 01 13
11 02	Wastes from non-ferrous hydrometallurgical processes
11 02 03	Wastes from the production of anodes for aqueous electrolytical processes
11 02 06	Wastes from copper hydrometallurgical processes other than those mentioned in 11 02 05
11 05	Wastes from hot galvanising processes
11 05 01	Hard zinc

EWC Code	Description
11 05 02	Zinc ash
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS
12 01	Wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	Ferrous metal filings and turnings
12 01 03	Non-ferrous metal filings and turnings
12 01 05	Plastic shavings and turnings
12 01 13	Welding wastes
12 01 17	Waste blasting material other than those mentioned in 12 01 16
12 01 21	Spent grinding bodies and grinding materials other than those mentioned in 12 01 20
15	WASTE PACKAGING: ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	Packaging (including separately collected municipal packaging waste)
15 01 01	Paper and cardboard packaging
15 01 02	Plastic packaging
15 01 03	Wooden packaging
15 01 04	Metallic packaging
15 01 05	Composite packaging
15 01 06	Mixed packaging
15 01 07	Glass packaging
15 01 09	Textile packaging
15 02	Absorbents, filter materials, wiping cloths and protective clothing
15 02 03	Absorbents, filter materials, wiping cloths, and protective clothing other than those mentioned in 15 02 02
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	End-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	End-of-life tyres
16 02	Wastes from electrical and electronic equipment
16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15
16 03	Off-specification batches an unused products
16 03 04	Inorganic wastes other than those mentioned in 16 03 03
16 03 06	Organic wastes other than those mentioned in 16 03 05
16 06	Batteries and accumulators

EWC Code	Description
16 06 04	Alkaline batteries (except 16 06 03)
16 06 05	Other batteries and accumulators
16 11	Waste linings and refractories
16 11 02	Carbon-based linings and refractories from metallurgical processes other than those mentioned in 16 011 01
16 11 04	Other linings and refractories from metallurgical processes other than those mentioned in 16 11 03
16 11 06	Linings and refractories from non-metallurgical processes other than those mentioned in 16 11 05
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	Concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	Wood, glass and plastic
17 02 01	Wood
17 02 02	Glass
17 02 03	Plastic
17 03	Bituminous mixtures, coal tar and tarred products
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
17 04	Metals (including their alloys)
17 04 01	Copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	Iron and steel
17 04 06	Tin
17 04 07	Mixed metals
17 04 11	Cables other than those mentioned in 17 04 10
17 05	Soil (including excavated soil from contaminated sites) stones and dredging spoil
17 05 04	Soil and stones other than those mentioned in 17 05 03
17 05 08	Track ballast other than those mentioned in 17 05 07
17 06	Insulation materials and asbestos-containing construction materials
17 06 04	Insulation materials other than those mentioned in 17 06 01 and 17 06 03

EWC Code	Description
17 08	Gypsum-based construction material
17 08 02	Gypsum-based construction materials other than those mentioned in 17 08 01
17 09	Other construction and demolition wastes
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02, and 17 09 03
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE
19 01	Wastes from incineration or pyrolysis of waste
19 01 02	Ferrous materials removed from bottom ash
19 01 12	Bottom ash and slag other than those mentioned in 19 01 11
19 01 18	Pyrolysis wastes other than those mentioned in 19 01 17
19 01 19	Sands from fluidised beds
19 02	Wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)
19 02 03	Premixed wastes composed only of non-hazardous waste
19 02 10	Combustible wastes other than those mentioned in 19 02 08 and 19 02 09
19 04	Vitrified waste and wastes from vitrification
19 04 01	Vitrified waste
19 05	Wastes from aerobic treatment of solid wastes
19 05 01	Non-composted fraction of municipal and similar wastes
19 05 02	Non-composted fraction of animal and vegetable waste
19 05 03	Off-specification compost
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	Paper and cardboard
19 12 02	Ferrous metal
19 12 03	Non-ferrous metal
19 12 04	Plastic and rubber
19 12 05	Glass
19 12 07	Wood other than that mentioned in 19 12 06
19 12 08	Textiles
19 12 09	Minerals (for example sand, stones)
19 12 10	Combustible waste (refuse derived fuel)
19 13	Wastes from soil and groundwater remediation
19 13 02	Solid wastes from soil remediation other than those mentioned in 19 13 01

EWC Code	Description
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	Separately collected fractions (except 15 01)
20 01 01	Paper and carboard
20 01 02	Glass
20 01 08	Biodegradable kitchen and canteen waste
20 01 10	Clothes
20 01 11	Textiles
20 01 34	Batteries and accumulators other than those mentioned in 20 01 33
20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 10 23, and 20 01 35
20 01 38	Wood other than that mentioned in 20 01 37
20 01 39	Plastics
20 01 40	Metals
20 01 41	Wastes from chimney sweeping
20 02	Garden and park wastes (including cemetery waste)
20 02 01	Biodegradable waste
20 02 02	Soil and stones
20 03	Other municipal wastes
20 03 01	Mixed municipal waste
20 03 02	Waste from markets
20 03 03	Street-cleaning residues
20 03 07	Bulky waste

Table F Proposed Clinical Waste Types to be Accepted at the Site

EWC Code	Description
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY
09 01	Wastes from the photographic industry
09 01 01*	Water-based developer and activator solutions[4]
09 01 02*	Water-based offset plate developer solutions[3]
09 01 03*	Solvent based developer solutions[3]
09 01 04*	Fixer solutions[3]
09 01 05*	Bleach and bleach fixer solutions[3]
09 01 07	Photographic film and paper containing silver or silver compounds[3]

[4] This is limited to wastes of this type arising from medical practices or associated research activities.

EWC Code	Description
09 01 08	Photographic film and paper free of silver or silver compounds[3]
18	WASTES FROM HUMAN OR ANIMAL HEALTHCARE AND/OR RELATED RESEARCH (EXCEPT KITCHEN AND RESTAURANT WASTES NOT ARISING FROM IMMEDIATE HEALTH CARE)
18 01	Wastes from natal care, diagnosis, treatment or prevention of disease in humans
18 01 01	Sharps (except 18 01 03)
18 01 02	Body parts and organs including blood bags and blood preserves (except 18 01 03)
18 01 03*	Wastes whose collection and disposal is subject to special requirements in order to prevent infection (e.g. dressings, plaster casts, linen, disposable clothing, nappies)
18 01 04	Wastes whose collection and disposal is not subject to special requirements in order to prevent infection
18 01 06*	Chemicals consisting of or containing hazardous substances
18 01 07	Chemicals other than those mentioned in 18 01 06
18 01 08*	Cytotoxic and cytostatic medicines
18 01 09	Medicines other than those mentioned in 18 01 08
18 01 10*	Amalgam waste from dental care
18 02	Wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 01	Sharps (except 18 02 02)
18 02 02*	Wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 02 03	Wastes whose collection and disposal is not subject to special requirements in order to prevent infection
18 02 05*	Chemicals consisting of or containing hazardous substances
18 02 06	Chemicals other than those mentioned in 18 02 05
18 02 07*	Cytotoxic and cytostatic medicines
18 02 08	Medicines other than those mentioned in 18 02 07
20	MUNICIPAL WASTES (HOUSEHOLD AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	Separately collected fractions (except 15 01)
20 01 31*	Cytotoxic and cytostatic medicines
20 01 32	Medicines other than those mentioned in 20 01 31
20 01 99	Other fractions not otherwise specified (consisting of nappies and absorbent hygiene products (AHPs) only)

Appendix B Odour Assessment Form

Background Information			
Person Undertaking Survey (& Position)			
Date:		Time:	
Description of Wind Strength (i.e. strong, gusty)			
Wind Direction			
Weather description (i.e. sunny, overcast)			
Temperature (°C)			

Survey Results			
Location	Intensity (1-6) (see below)	Persistence (A-E) (see below)	Odour Character (i.e. waste odour)
Northern boundary			
Eastern boundary			
Southern Boundary			
Western Boundary			
Closest Property			
If odour is strong / persistent additional information to be detailed below			

Intensity	
1	No detectable odour
2	Faint odour (barely noticeable)
3	Moderate odour (odour easily detected)
4	Strong odour (bearable but offensive)
5	Very strong odour (instinct to walk away)
6	Extremely strong odour highly likely to cause annoyance (May induce nausea)

Persistence		
A	Occasional	Less than 10% of the time
B	Intermittent	10-30% of the time
C	Frequent	30-50% of the time
D	Persistent	50-75% of the time
E	Constant	>75% of the time

Further Actions

If during the survey the odour is strong or persistent at any location on the site boundary, the following information requires completion regarding plant operation.		
Waste Containment	Has any loss of containment occurred on site?	
	If yes, what procedures are being followed?	

Appendix C Odour Complaints Reporting Form

Installation to which complaint relates:	Date recorded:	Ref No:
Name and address of caller:		
Tel No. of caller:		
Location of caller in relation to installation:		
Time and date of complaint:		
Date, time and duration of offending odour:		
Caller's description of odour, e.g. comparison with other odours, strong/weak, continuous, fluctuating:		
Has the caller any other comments about the offending odour?		
Weather conditions (e.g. dry, rain fog, snow):		
Wind strength and direction (e.g. light, steady, strong, gusting):		
Any previous complaints relating to this odour?		
Any other relevant information:		
Potential odour sources that could give rise to the complaint:		
Operating conditions at the time offending odour occurred – e.g. any loss of containment, abnormal meteorological conditions, for example		
Follow up Date and time caller contacted:		
Action taken:		
Amendment required to Odour Management Plan (Y/N, if Y provide details)		
Form completed by:	Signed:	

Appendix D Odour Survey Methodology

The exact locations for offsite monitoring are selected based on the prevailing wind direction and proximity to receptors.

The monitoring will be extended to the surrounding locality if odour likely to cause annoyance is detected at the Site boundary.

At each location observations shall be made concerning odour intensity, persistence and character, time, date, weather conditions and any 'abnormal' site operating conditions at the time of the survey. Surveys shall be carried out in accordance with the monitoring protocol contained within the H4 Odour Guidance.

The odour assessor should not be subject to significant site odour in the 30-minutes prior to the assessment. This is to ensure that monitors are not suffering from odour fatigue and will be sensitive to site odours. Furthermore, the following exclusions shall apply:

- staff members that are regularly exposed to site odours for longer than 30-minutes; and
- any staff members known or suspected of having a very poor sense of smell should not be used for odour monitoring routinely.

The inspections shall be undertaken as follows:

1. The person should walk slowly and breathe normally and begin their assessment at areas of expected low odour concentration, i.e. upwind of the site, and should move to areas of high odour concentration. If odour is detected while walking, the intensity should be recorded as at least 3 (distinct), or higher.

2. If an odour cannot be detected whilst walking, the person should periodically stand still and inhale deeply facing upwind. If odour is then detected, but can only be detected in this manner, the odour 'intensity' should be recorded as 1 (very faint) or 2 (faint).

3. Following detection of any odour of intensity 3 or above at the Site boundary during an odour inspection, the following measures will be taken:
    - the olfactory survey will deviate to determine the extent of plume downwind (at or above an intensity level 3) and at potential receptors affected. Contingency measures will be followed; and
    - an on-site inspection shall be carried out seeking to trace any observed odour back to source so that the appropriate corrective and/or preventative action can be taken (with regard to Contingency Measures).

On-site inspections would be undertaken by continuing the olfactory survey methodology onto the site to inspect all potential odour sources.

The Site Manager (or any appointed representative) shall be notified immediately of any detected odours that are considered to have the potential to give rise to significant off-site odour impact (intensity 3 at a receptor location).

Countrystyle Recycling Limited
December 2023