

The Environmental Permitting  
(England and Wales) Regulations 2016

Permit EPR/CB3909CW  
Heathfield MRF Site

**Odour Management Plan**  
**Version 1.0.0**

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**ODOUR MANAGEMENT PLAN ISSUE LOG**

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## 1 INTRODUCTION

### 1.1 Odour Management Plan - Objectives

This document outlines the methods by which Valencia will systematically assess, reduce, and prevent potentially odorous emissions from Heathfield Materials Recycling Facility operated under Environmental Permit EPR/CB3909CW.

It sets out what Valencia deems to be appropriate measures for routinely mitigating off-site odour taking into consideration operational activities on a situational basis. This odour management plan serves to aid the decision-making process on the choice of controls, general site design, and operational practice in line with current industry best practice. Where additional risks are identified Valencia will review the necessity for any additional measures and implement them accordingly.

This plan sets out to ensure that:

- all potential odour sources are identified;
- odour impact is considered as part of routine inspections;
- odour is primarily controlled at source by good operational practices, the correct use and maintenance of plant, and operator training;
- all appropriate measures are taken to prevent or, where that is not reasonably practicable, to minimise odorous emissions to air from the installation that may be considered offensive at locations outside of the installation boundary;
- any issues that have the potential to result in off-site odour are addressed promptly;
- where reasonably practical, people outside of the site are not exposed to levels of odour that would result in annoyance;
- the risk of unplanned odour releasing incidents or accidents that would result in annoyance is minimised; and
- site developments take into account odour potential and potential impacts from work carried out

This document has been compiled with specific regard to on-going waste operations at the site and to the general operational management and development of the site. When approved, this revised document will supersede all previous OMPs and will form part of Valencia's Integrated Business Management System (BMS).

This document has been prepared by Valencia's Landfill Compliance and SHEQS Teams. This plan draws upon Valencia's national standards for production and issue of OMPs for landfill facilities across the UK, which have been reviewed and updated in 2013 in addition to the experiences gained in the effective control of landfill odour from 2009 to present at key sites in the Company's portfolio.

## 1.2 Key Reference Documents

The methodologies presented take account of Environment Agency (EA) guidance documentation, as detailed below:

- EA Technical Guidance Note H4 Odour Management (March 2011)
- EA Internal Guidance for the Regulation of Odour at Waste Management Facilities (version 3.0)
- EA Guidance on Odour Management Plans for Waste Handling Facilities (v1.0, 2010)
- The Environmental Permitting (England and Wales) Regulations 2016
- Regulating odour – a quick guide (163\_12)
- Odour Regulation FAQ (Quick Guide 380\_12)
- EA Guidance on How to comply with your environmental permit (v6, Document 433\_11) (withdrawn)
- Develop a management system: environmental permits (<https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>)
- Control and monitor emissions for your environmental permit (<https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit>)

Additional information is set out in the following documents, further references are included through this plan to internal Valencia document:

- Valencia Integrated BMS requirements;

## 2 SITE ENVIRONMENTAL SETTING

### 2.1 Installation Details

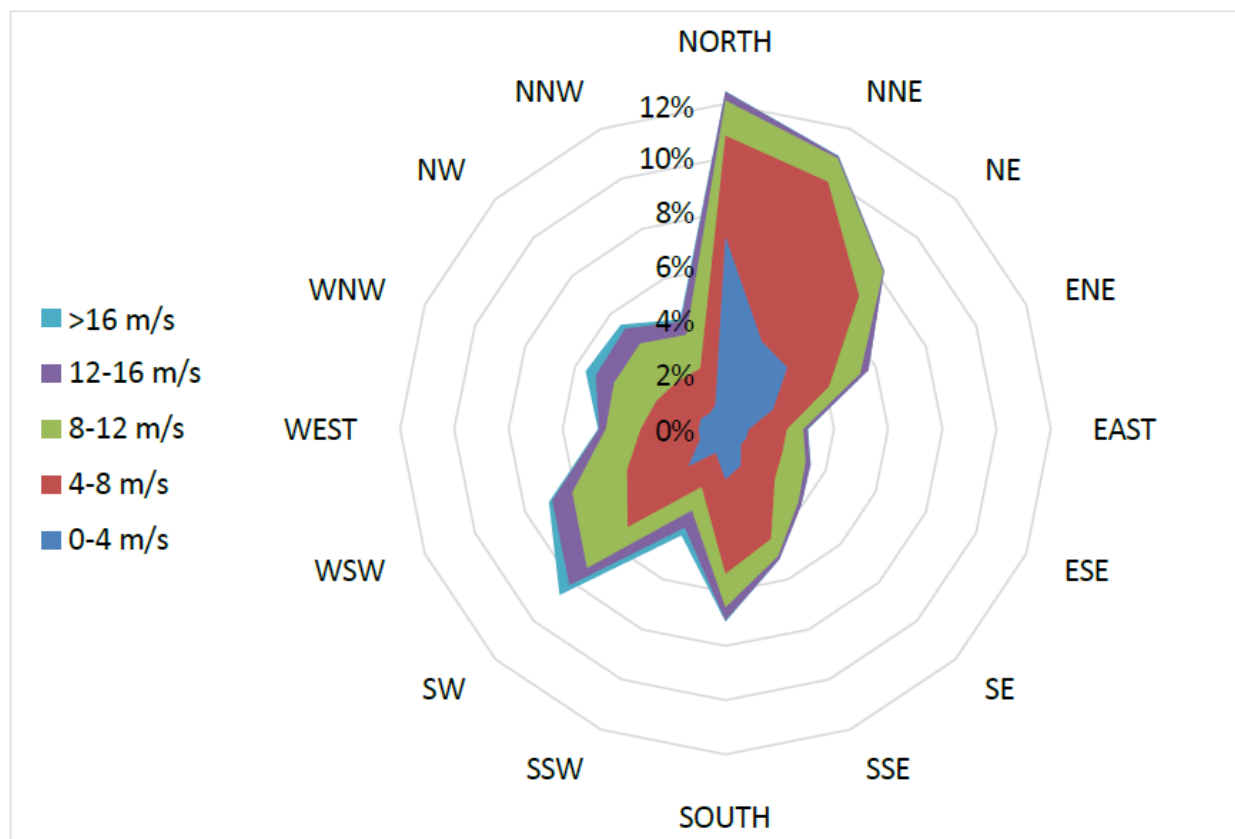
The Heathfield WTS is located along, Clay Pits Way, Kingsteignton TQ12 3GP approximately 1km north of Higher Sandygate. The site is centred on National Grid Reference (NGR) SX 86155 76011, south of the Heathfield landfill site.

The land surrounding the site is predominantly agricultural with significant quarrying works in the vicinity of the site. The landfill area extends north from the MRF building, with the land beyond being agriculture and interspersed woodland to the north.

### 2.2 Pathway Assessment

Local meteorological data is routinely recorded at the calibrated weather station, situated at the Heathfield Landfill. Figure 1 displays a wind rose showing local predominant wind direction for 2018, from the Heathfield Landfill weather station. It can be seen that the predominant wind direction is from the north and north-north-east direction. The predominant wind speed range is 4 – 8 m/s.

*Figure 1 – Wind Rose for Heathfield Landfill Weather Station*



### 2.3 Potential Receptor Locations

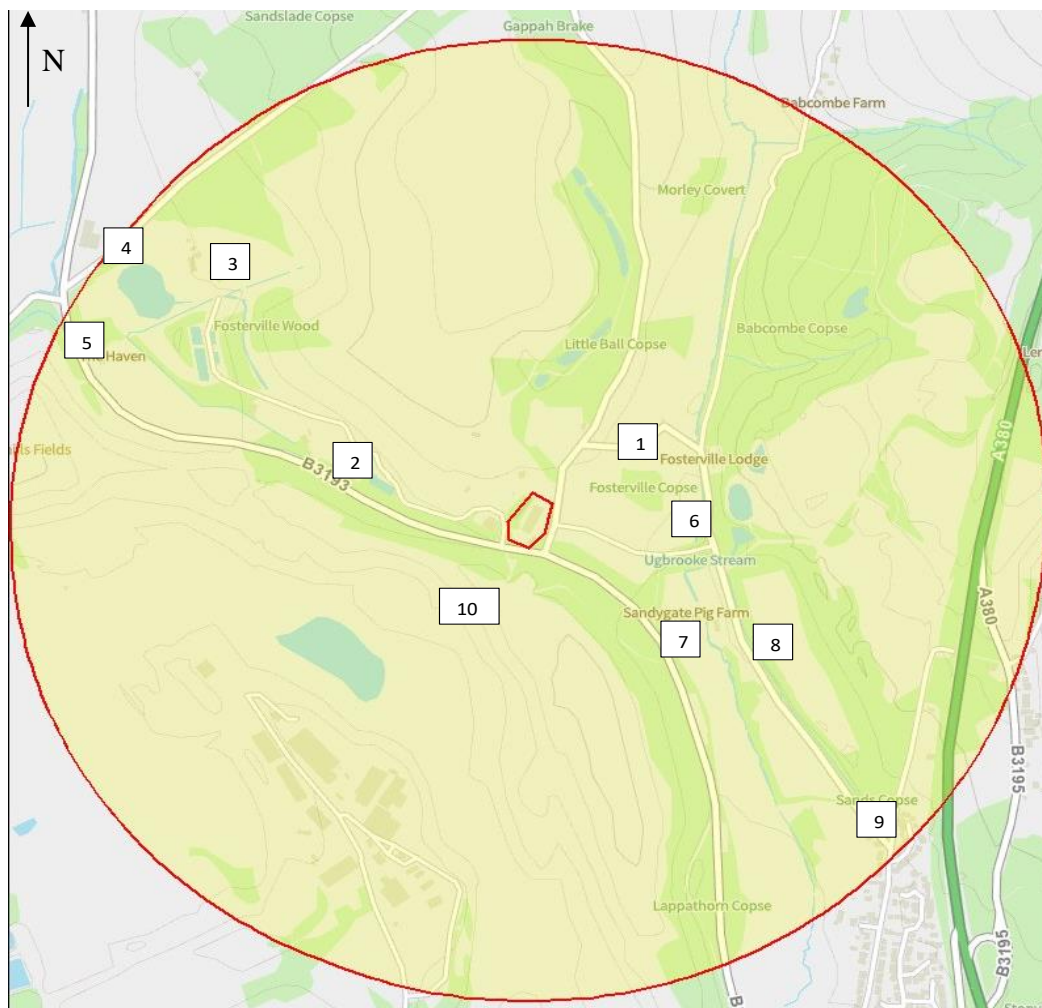
Review of the site’s environmental setting has highlighted potentially sensitive off-site receptors with regards to any odorous emissions arising from the Heathfield MRF Site, as follows:

No	Receptor	Receptor Type	Distance from Proposed Permit Boundary	Direction from Site	Location Relative to Prevailing Wind
1	Properties at Fosterville*	Residential	210m	NE	Cross Wind
2	Fosterville Building Materials	Commercial	340m	W	Cross Wind
3	Gilpin Demolition Group	Industrial	740m	NW	Cross Wind
4	Mason Kings Depot	Commercial	1000m	NW	Cross Wind
5	The Haven	Residential	880m	NW	Cross Wind
6	Ugbrooke Stream	Surface Water	300m	E	Cross Wind
7	Sandygate Pig Farm	Commercial/Residential	340m	SE	Upwind
8	RD Johns Foodservice Depot	Commercial	590m	SE	Upwind
9	Properties On Woodlands	Residential	950m	SE	Upwind
10	Sibelco Preston Manor Quarry Works	Industrial	170m	S	Upwind

\* Distance to the residential receptor at its closest point has been used as a proxy for the wider residential area at increased distance from the site

A plan showing the site’s environmental setting and high sensitivity off-site receptor locations is shown below:

**Figure 2 - Potentially Sensitive Receptor Locations (1km Radius)**



### **3 SITE/PROCESS DESCRIPTION**

#### **3.1 Site Layout Plan**

A layout plan of the Heathfield MRF is included as a Drawing in the appendices

#### **3.2 Process Description**

Heathfield MRF pre-treatment for incineration, recycling and residual landfill deposit is operated to the south of the Heathfield Landfill Site. The MRF is not intended to process putrescible waste, it is predominantly intended for recoverable elements of commercial and industrial wastes.

The annual throughput of the MRF building will be no more than 350,000 tonnes.

Site operational hours are:

- Monday to Friday, 07:15 to 17:00
- Saturday 07:15 to 12.00 – when required
- Sunday – Closed to incoming waste
- Bank Holidays – 07:15 to 17:00 – when required



## 4 MRF ODOUR CONTROLS

In line with current industry best practice, the odour controls set out in the sections below will be used as the 'appropriate measures' to where possible prevent and minimise odour associated with site operations at the Heathfield MRF.

### 4.1 Overarching Management Responsibility

The site management will have responsibility for ensuring that potentially odorous emissions arising from the installation are minimised. Adequate staffing levels will be maintained at all times to ensure the effective operation of the facilities.

Site Management Review meetings will be held at regular intervals for site management to discuss current and planned site operations. Odour management will be included on the agenda for this meeting. Identified actions arising from the meetings and responsibilities for their completion, will be recorded within the meeting minutes and circulated between relevant Valencia personnel.

### 4.2 Identification of Potential Odour Sources

The waste management activity undertaken involves the short term, temporary storage of waste delivered into the MRF. The potential odour sources associated with this activity are:

- i. emissions from putrescible feedstock material – municipal solid waste
- ii. emissions from waste delivery vehicles

Under 'normal' operational conditions, municipal solid waste is considered to have a moderate odour potential. Putrescible and black bag waste will be direct delivered to the landfill.. No significant change in seasonal odour potential is expected with regard to off-site odour risk.

Onward transfer of wastes will be on a first in, first out basis and within 72 hours of arrival at site. 72 hours allows for the maximum storage from arrival within the MRF for all potentially degradable/odorous waste. Maximum storage times are shown in Section 4.3, below. The premise of operation will be that waste in the MRF will be kept to a minimum at any one time. Waste storage bays will be entirely emptied of waste to ensure that old waste is not left within the facility.

### 4.3 Waste Feedstock Inventory

Key waste streams received at the site are detailed below. Assessment of the associated odour potential under 'normal' operational conditions is provided.

*Table 1 - Key Waste Streams and their Odour Potential*

Waste Description	Odour Potential (H, M, L)
Municipal Solid Waste	M
Commercial & Industrial	L

The majority of wastes accepted at the site will have a low odour potential. The list of potentially odorous waste types is set out in the following table. These waste types will be subject to additional checks at the pre-acceptance stage to understand the extent of contamination on packaging or the proportion of putrescible waste present. Where there is a high risk of odour they will not be accepted at the MRF but instead be directed to the landfill.

Checks will also be made on arrival at the site and any loads causing significant odour will be directed to the landfill.

PERMITTED WASTE TYPES THAT MAY CAUSE ODOUR	
Waste Code	Description
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
10 12	Wastes from manufacture of ceramic goods, bricks, tiles and construction products
10 12 12	Wastes from glazing other than those mentioned in 10 12 11
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 06	Mixed packaging
15 01 09	Textile packaging
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 10	Combustible waste (refuse derived fuel)
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of waste other than those mentioned in 19 12 11.
19 13	Wastes from soil and groundwater remediation
19 13 02	Solid wastes from soil remediation other than those mentioned in 19 13 01
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 03	Other municipal wastes
20 03 01	Mixed municipal waste
20 03 02	Waste from markets

Proposed waste quantities and storage times are set out in the Table below. However there is an expectation that any degradable waste would be removed from site within 72 hours. No individual stockpile will be more than 400 cubic metres in size.

Proposed Waste Storage Capacities and Times						
Waste stream	How it is stored	Max. length (m)	Max. width (m)	Max. height (m)	Volume/ m <sup>3</sup>	Max. Storage Time
Mixed waste	Internal Bay	12.5	8.0	4.0	400	72 hours
Low CV RDF	MRF Bay	7.0	3.5	4.0	200	48 hours
Plastics	MRF Bay	7.0	3.5	4.0	98	1 month
Other (50-300mm mid-heavy residue)	MRF Bay	7.0	3.5	4.0	98	72 hours
High CV RDF and Residue	MRF Bay	7.0	6.5	4.0	200	48 hours
FE Metals	Skip x4	N/A	N/A	N/A	N/A	1 month
Non FE Metals	MRF Bay	4.5	3.5	3.5	55	1 month
Hardcore	MRF Bay	10.0	3.5	4.0	140	1 month

Proposed Waste Storage Capacities and Times						
Waste stream	How it is stored	Max. length (m)	Max. width (m)	Max. height (m)	Volume/ m <sup>3</sup>	Max. Storage Time
Other (50-300mm lights residue)	MRF Bay	10.0	3.5	4.0	140	72 hours
Rigid Plastics	MRF Bay	10.0	3.5	4.0	140	1 month
Wood	MRF Bay	10.0	3.5	4.0	140	1 month
10-50mm Lights	MRF Bay	4.5	3.5	3.5	55	72 hours
0-10mm fines	MRF Bay	12.6	4.5	4.0	226	72 hours
Long parts	MRF Bay	4.5	4.0	4.0	72	72 hours
Bulky Waste	Internal Bay	8.0	6.3	4.0	200	72 hours

\* The aim will be to remove fines as soon as possible but up to 2 weeks may be required where waiting on laboratory results.

In addition to the potential odour sources specified above, the following adjacent potential odour source has been identified. There is potential for emissions from adjacent landfill activities which are managed by Valencia under permit ERP/BV7028IP. Odour from these operations are managed in accordance with Valencia's management systems.

## 5 CONTROLS

### 5.1 Containment of Activities

MRF waste management activities are carried out within the confines of the MRF building which benefits from roller shutter doors.

Most vehicles arriving at the MRF will be enclosed. Waste is discharged from delivery vehicles and loaded into articulated vehicle trailers within the enclosed MRF building. The period of time required for discharge and loading of wastes will be minimised wherever possible.

### 5.2 Odour Management Sprays

Odour management sprays are not typically used at the Heathfield MRF. The requirement to use odour neutralising agents around sensitive areas of the installation or during specific activities remains subject to on-going review by the site management team.

### 5.3 Waste Reception and Storage

All waste received at the site is initially assessed by the weighbridge operator to ensure it complies with the waste transfer note description and the permitted waste types for the facility. If a significant odour risk is identified at the weighbridge the load will be directed to the landfill where it can be immediately covered. Any unauthorised waste that has not been unloaded will be refused access to the site. Further details of waste acceptance procedures are contained within the Valencia's waste acceptance procedure.

Most waste is transported to the MRF in enclosed waste delivery vehicles. Waste shall be discharged from the delivery vehicle directly onto the floor within the MRF building and consolidated by mobile plant after visual inspection.

Waste delivered to the site will be predominantly commercial and industrial. Waste types received at the site should not exhibit significant malodorous properties under normal operating conditions.

Where it is necessary to receive potentially odorous materials at the site or where a stockpile is causing or is likely to cause significant odour, the wastes will be loaded onto the next available vehicle, ensuring that odorous waste is sent to the landfill promptly and thus removing the potential for an odorous emission. There are between 30-40 outgoing vehicle movements each

day to either third party sites or dumpers travelling to the landfill. The odorous waste will be loaded onto one of these. This averages between 2-3 vehicles per hour that could remove the waste, so odorous waste will be removed within an hour during the working day. Should there be an issue overnight then waste will be sent out on the first available lorry the following morning.

Normal storage within the MRF will be around 800 tonnes but this may increase to around 1,400 tonnes during a bank holiday weekend. Wastes will not be stored within the MRF for more than 72 hours.

#### **5.4 Removal of Waste from Site**

Onward transfer of waste will be on a first in, first out basis controlled by efficient use of the space within the MRF and the sequential acceptance of waste into specific bays. Waste will be rotated – the oldest waste will be removed first and the bays will be emptied entirely in rotation to ensure that no residual waste remains in the bays. Once an economically viable load has built up, waste will be removed from site usually within 72 hours of arrival at site. Waste will be removed throughout each working day, The MRFs will be managed on the premise that as little waste as possible remains in the MRF.

Waste transport vehicles removing the waste from site will be loaded and sheeted within the enclosed MRF to create containment of the waste prior to leaving the transfer building.

#### **5.5 Waste Transport Vehicles**

The site staff will inspect third party vehicles delivering waste to the site on an on-going basis and shall report any requirement for supplementary vehicle cleaning and/or maintenance to the vehicle operator, as required. This will reduce the potential for build-up of residual potentially odorous material within the incoming waste vehicles.

#### **5.6 Planned Temporary Odorous Activities**

If it is necessary to undertake planned temporary actions that have an associated high risk of significant off-site odour (e.g. removal of odorous unauthorised waste from site), site management will contact the Environment Agency and any high risk potential receptors prior to such actions commence to advise them of:

- the operation being undertaken
- the reason(s) for doing so
- planned additional odour mitigation measures;
- and timescales for completion

Consideration will be given to the prevailing weather conditions when undertaking such activities in order to minimise any potential off-site odour impact.

'Unplanned' temporary odorous activities (e.g. in the event of a site emergency) will be addressed immediately in accordance with the Action Plan set out in Section 6.2 below.

#### **5.7 Plant and Equipment**

The site management will ensure that sufficient plant and equipment is maintained at the facility to adequately handle all delivered waste in an efficient and, wherever possible, odour-free manner.

All plant and equipment shall be maintained in good working order and in accordance to the supplier's or manufacturer's recommendations. Plant operators shall be responsible for the daily and weekly vehicle checks of their respective machines. Any defects shall be reported to the site management promptly and rectified as soon as possible. Records will be retained on the operator maintenance check and defect sheets.

### **5.8 Surface Water/Leachate Management**

The MRF building will include impermeable flooring draining to a sealed drainage system. Any potential process water generated within the MRF building is collected by the building's impermeable surface and contained within the MRF drainage system, although very limited process water or leachate is expected. This water is held on the building floor prior to being taken off site for disposal at a suitably permitted facility and will be of a suitable size and standard to meet the requirements specified in the Fire Prevention Plan Guidance. Roof run off will be captured by the outside surface water management system.

### **5.9 Housekeeping**

Site roads, the yard and the MRF floor will be swept at regular intervals to prevent the accumulation of dusty or muddy material. General housekeeping will be undertaken daily and checks will be carried out to ensure smooth and efficient running of the site. Mobile plant will be subject to regular inspections to ensure waste does not accumulate on the vehicle.

Site infrastructure shall be inspected for damage and wear by the site management or appointed responsible person at pre-defined intervals.

In the event that residue of a particularly odorous waste remains on the floor of the MRF, wash down of the affected area will be carried out. Dirty water from the process will be contained in the MRF's contained drainage system within the building.

### **5.10 Training**

All Valencia personnel working at the facility will be subject to a formal documented training programme in accordance with Company procedures. Matters relating to site environmental management and control form part of this core training programme for all individuals.

The preferred standard for third party specialist monitoring contractors completing subjective odour surveys will be formal assessment for odour sensitivity and detection threshold at a specialist facility (e.g. Silsoe Institute, or equivalent) in order to demonstrate suitability for this subjective monitoring role.

### **5.11 Community Liaison**

Valencia organises the Community Liaison Group and formal meetings are scheduled annually or at intervals determined by local engagement. Site odour performance and community feedback is included as a routine agenda item.

Site contact details and emergency (out-of-hours) numbers are shown on the site identification board and Company website and are provided to the Community Liaison Group. Direct feedback to the site is encouraged at all times in relation to any perceived issues associated with operational activities.

### **5.12 Unit Emergency**

Unit Emergency Plans are made available to all site staff. In the event of a site emergency, the site management will be notified without delay.

## 6 ODOUR MONITORING

### 6.1 Meteorological Conditions

A meteorological station is installed at the adjacent Heathfield Landfill site. It is calibrated and maintained in order to measure and record weather conditions (including atmospheric pressure, and wind speed and direction) at automated 15-minute intervals. The data collected by the weather station will assist site management in undertaking necessary actions such as modifications to site operations, the use of deodorising sprays, or additional monitoring resources to be implemented.

In promoting proactive management of the risks arising from the site, site management will review the weekly forecast of meteorological conditions for the site at the start of each working week. Details of the forecasted conditions will be assessed against proposed activities for the period. Key data to assist the Unit Manager will be the assessment for wind speed, wind direction and potential atmospheric pressure changes.

In the event of failure of the station, meteorological data will be obtained from Valencia's local and national network of monitoring stations and from other commercial organisations such as <http://www.xcweather.co.uk> while the site's unit is re-instated/repared. The target time for repair of the station is within 5 working days of identification of a fault relating to wind speed, wind direction or atmospheric pressure.

### 6.2 Regular Inspection/Olfactory Monitoring

All installation personnel are responsible for reporting any odour problems. The site management will be notified immediately of any detected odours that are considered to have the potential to give rise to an off-site odour impact.

The site management will ensure that routine inspections are made of the waste MRF building during operational periods in order to identify any odour sources and to establish whether any odours are discernible at the perimeter of the installation. Inspections will be made at least once a day.

Monitoring will be carried out upwind and downwind of the building to assess whether any emissions are occurring.

All staff responsible for assessing odour will receive training from the site management on the odour inspection procedure. The minimum standard for all Valencia staff and, if there is a need, third party specialist monitoring contractors completing subjective odour surveys, will be formal assessment for odour sensitivity and detection threshold at a specialist facility (e.g. Silsoe Institute, or equivalent) in order to demonstrate suitability for this subjective monitoring role. Subjective odour surveys are not undertaken by staff based on the operational area full time as they may have become desensitised to site odour.

In the event that the MRF operation gives rise to persistent and repeated off site odour which causes a nuisance to neighbouring sensitive receptors, an inspection programme will be established and will be undertaken as follows:

- I. The responsible person will visit each of the specified installation boundary monitoring locations.
- II. The responsible person will stand still and breathe deeply facing upwind for a period up to 1 minute.
- III. If odour is detected, but can only be detected in this manner, the odour 'intensity' should be recorded as 2 (faint). If odour is detected while walking or breathing normally, the

- intensity should be recorded as at least 3 (moderate).
- IV. The site management will be notified immediately of any detected odours that are assigned an on-site odour intensity >3. This will trigger a supplementary off-site odour survey at any downwind off-site potential receptors.
  - V. Observations including time, date, weather conditions, odour type, location, intensity, extent and sensitivity will be recorded on the Odour Survey Log Sheet (Appendix 2). 'Abnormal' site operating conditions at the time of the survey e.g. infrastructure installation/refurbishment, etc. should also be recorded.

Odour monitoring will be undertaken around the perimeter of the site, along the John Acres Lane adjacent to the site and at the site entrance road from Clay Pits Way.

## 7 ODOUR ACTION PLAN

### 7.1 Odour Complaint Investigation

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

1. The responsible person receiving the complaint at the site will initially record the key details on Valencia's Incident Management System (IMS) in accordance with Valencia's Complaints, Feedback and Requests Procedure. Key information will be recorded at this time in order to facilitate further suitable investigation.
2. Site Management will be informed of the odour complaint as soon as possible, including the location, time and date of the complaint being lodged (where available).
3. In recognising that odour can be transient and short-lived, timely notification of odour complaints directly from the complainant and / or the Environment Agency is imperative to allow for appropriate investigation. If the odour complaint occurred more than 12 hours before notification is provided to Valencia, it may not be possible to fully investigate or substantiate the complaint. Valencia will, however, complete and record a complaint investigation, as set out below, as appropriate.
4. If the complaint is received within 12 hours of the incident, site management (or an appointed representative) will visit the complaint location as soon as practicable in order to subjectively determine odour presence or absence. Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible, provided the complainant is happy to do so.
5. If an odour is present at the complaint location, the key 'FIDOL' criteria will be assessed as follows:

**Frequency** – is the odour intermittent or persistent; is there a history of complaints at this location?

**Intensity** – is the odour faint, moderate, strong, or very strong?

**Duration** – how long is the odour present at this location?

**Offensiveness** – provide a description of the odour; is it high, moderate, or low offensiveness?

**Location** – is the odour present at a remote or highly sensitive location; is the odour plume localised or widespread?

The site management will subsequently undertake the following further assessment process:

1. Review of the operations at the site prior to and at the time of the complaint;
2. Review of the environmental control systems operative prior to and at the time of the complaint;
3. Review of the meteorological conditions (wind speed/wind direction/rainfall/atmospheric pressure) prior to and at the time of the complaint – to establish whether a pathway can be established between the site and the complainant;
4. Review of the previous complaint history at the location identified.

The odour complaint will be substantiated (or otherwise) by the site management (or appointed representative) in accordance with the following (in order of priority):

1. The Environment Agency has visited the complaint location and has provided confirmation that the odour exists, is significant and is attributable to Heathfield MRF;
2. The site management (or appointed representative) has visited the complaint location and has provided confirmation that the odour exists, is significant (based on the FIDOL assessment above) and is attributable to Heathfield MRF.

Valencia will contact the Environment Agency to discuss any substantiated complaint incident as soon as possible following receipt of the details, allowing sufficient time for the above investigation to be completed. The target response period during the normal working week is 48 hours from complaint receipt. If the necessary contact details are available and direct feedback has been requested, Valencia will also contact the complainant directly to discuss the issue, the



findings of the subsequent investigation and any actions arising.

## 7.2 Action Plan

Odour 'non-conformances' may be determined at the site as follows:

- Receipt of an odour complaint that is attributable to the Waste MRF;
- Detection of significant off site odour that relates to Heathfield MRF during routine odour surveys.

The trigger level for determining that an odour non-conformance has occurred will be where odour is detected at an intensity of 3 or above along the site boundary or where an odour intensity of 2 or above is detected at the off-site receptors.

In the event that either of the above odour 'non-conformances' are determined at the site, the following actions shall be taken:

## 7.3 Responsible Person(s):

Valencia's primary point of contact will be the site management for the facility on all matters associated with site operations and environmental performance. In the event that the site management is unavailable or non-contactable, the contingency management staff to be contacted will be as follows:

## 7.4 Actions:

- The site management will be informed.
- Thereafter the site management will co-ordinate with (where appropriate):

Externally: Environment Agency Officer (central Agency call centre if out of hours)

Internally: Manager, Environment Advisor, Site Staff

1. If the incident relates to receipt of an external complaint, an investigation will be completed in accordance with Section 7.1, above.
2. If not previously undertaken, the site management (or appropriate responsible person) will undertake an investigation in order to determine the likely cause(s) of the off-site odour. Upon identification of the likely odour source(s), the appropriate corrective and preventative measures will be identified, as detailed above in Section 4.

Key items for consideration will be as follows:

- Material inputs – change in waste type, volume, odour characteristics;
  - Waste reception hall – building integrity, housekeeping;
  - Failure of external utility supply – electricity;
  - Mechanical breakdown – pumps;
  - Procedural failure (human error);
  - Short-term abnormal weather patterns – wind direction, temperature, inversions;
  - Abnormal operating conditions – temporary odorous activities
3. Upon identification of the likely odour source(s), the appropriate corrective and preventative measures will be identified and implemented under the direction of the site management. Additional support and technical expertise will be provided by internal / external technical specialists, as required. Actions could include prioritising particular wastes for removal from site.
  4. In the event that sustained or significant plant or process failure occurs, waste feedstock material will be diverted to alternative off-site facilities. In extreme conditions, operations will temporarily cease through close liaison with the Environment Agency. This might be where an odour intensity of 4 or more has been detected at the off-site receptors over a period of more than 2 days.
  5. The OMP will be reviewed in line with Section 8 below, in order to ensure it continues to represent 'all appropriate measures'.

### **7.5 Timescales**

In the event that it proves impracticable to carry out adequate remedial measures within 5 working days, the site management will agree with the Environment Agency the proposed actions and the timescales for their completion.

### **7.6 Records**

Details of odour 'non-conformances' including subsequent investigations, timescales and remedial measures taken, and notifications of the relevant internal and external bodies shall be recorded by the site management on the IMS or Daily Site Log as appropriate, and copies shall be maintained within the site office.

### **7.7 Additional Supportive Odour Monitoring**

The requirement for (and frequency of) additional supportive odour monitoring will be agreed between the site management and the Environment Team. This may include, but not be limited to:

- on-site subjective odour inspections;
- site perimeter subjective odour inspections; and
- off-site subjective odour inspections.

## **7 DOCUMENT AND AUDIT REVIEW**

### **7.1 Review Requirement and Timescale**

While operations continue at the site that could give rise to the generation of odour, this odour management plan will be formally reviewed at minimum bi-annual intervals to ensure it continues to reflect the ongoing site status and associated sensitivity/risk. Any required changes to the conditions set out within this document will be formally agreed with the Environment Agency prior to their implementation.

### **7.2 Audit**

The processes described in this document will be audited by Valencia in accordance with the Company's auditing procedures.

### **7.3 Review and Plan Update**

This management plan sets out the appropriate measures Valencia will undertake in controlling any odorous or potentially odorous activities from the facility. If, on review of the performance of the facility, Valencia and/or the Environment Agency propose to seek revision of this plan, then the following course of action will be undertaken by both parties:

In potentially critical circumstances, where Valencia recognises the requirement for the immediate implementation of changes to the management plan to prevent or reduce significant odorous emissions, these changes will be discussed with the Environment Agency without delay but may be actioned by Valencia ahead of formal agreement with the Environment Agency.

Where Valencia proposes changes to the management plan that involve a more strategic and/or phased approach rather than a need for immediate implementation, a formal proposal will be submitted by Valencia to the Environment Agency setting out the specific issues arising from document review, and the options/issues requiring Valencia's further attention following Agency approval. The Environment Agency will review Valencia's submission/updated management plan and confirm they are satisfied with the proposed changes. Where possible, the response should be within 28 days of receipt of Valencia's submission. The agreed required changes will then form the future 'appropriate measures' for the site with regard to odour management and control.

Where changes to the management plan are proposed by the Environment Agency, these will be discussed with Valencia setting out the Environment Agency's clear expectation from the changes in addition to timescales for their implementation. It is recognised that these changes

may range from matters that require immediate implementation to those that may be implemented over an extended timeframe. In each case, the required changes will be discussed with Valencia and an appropriate action plan agreed. Valencia will (wherever possible) undertake the identified changes in accordance with the timescales proposed for the work, at which point the updated 'appropriate measures' will take effect.

[END]

## APPENDIX 1 – Odour Classification and Meteorological Data Referencing

### Meteorological Data

The Beaufort Wind Scale					
Force	Description	Observation			mph
0	Calm	Smoke rises vertically			0
1	Light air	Smoke drifts in wind direction; wind vanes not moved			1-3
2	Light breeze	Wind felt on face, leaves rustle; wind vanes moved			4-7
3	Gentle breeze	Leaves and small twigs in constant motion			8-12
4	Moderate breeze	Raises dust and paper; small branches are moved			13-18
5	Fresh breeze	Small leafy trees swayed; medium branches moved			19-24
6	Strong breeze	Large branches moved; umbrellas used with difficulty			25-31
7	Near gale	Whole trees moving; walking against wind inconvenient			32-38
8	Gale	Twigs break off trees; walking generally impeded			39-46
9	Strong gale	Slight structural damage occurs			47-54

Assessment of Pasquill Stability Categories					
Surface wind speed	Sunshine			Night Time	
m.p.h.	Strong	Moderate	Slight	Thickly overcast or >1/2 cloud cover	<3/8 cloud cover
<4.5	A	A-B	B	-	G
4.5-6.7	A-B	B	C	E	F
6.7-11.2	B	B-C	C	D	E
11.2-13.4	C	C-D	D	D	D
>13.4	C	D	D	D	D

Notes:

- Strong sunshine corresponds to a sunny midday in midsummer
- Slight sunshine corresponds to a sunny midday in midwinter
- "Night time" is defined as the period one hour before sunset to one hour after dawn
- Wind speed should be estimated by reference to the Beaufort scale
- Pasquill categories are from A = very unstable to F/G = very stable

### Odour Character Key

Descriptors	Value	Intensity
A - acidic	0	No detectable odour
B - acrid	1	Very Faint odour - need to stand still, face the wind and inhale to detect
C - agricultural	2	Faint odour
D - ammoniacal	3	Distinct odour - detectable when walking & breathing normally
E - cabbagey	4	Strong odour
F - dustbin	5	Very strong odour
G - eggy/sulphurous	6	Extremely strong odour
H - fruity		
I - landfill gas	<b>Value</b>	<b>Extent</b>
J - mains gas	1	Local and transient - only detected for brief periods at the site boundary when the wind drops or blows
K - oily	2	Transient - as 1, above, but detected away from the site boundary
L - putrid	3	Persistent but fairly localised
M - pungent	4	Persistent and pervasive up to 50m away from site boundary
N - rotten	5	Persistent and widespread - detected >50m away from site
O - sickly		
P - sour	<b>Value</b>	<b>Sensitivity</b>
Q - sweet	Low	e.g. footpath, road
R - compost	Medium	e.g. industrial or commercial workplaces
	High	e.g. housing, pub / hotel

	<b>Value</b>	<b>Offensiveness</b>
	1	Less/potentially offensive
	2	Moderately offensive
	3	Most/highly offensive



<b>MSMP5</b>	South West Landfill boundary (W)									
Use Classification scheme										

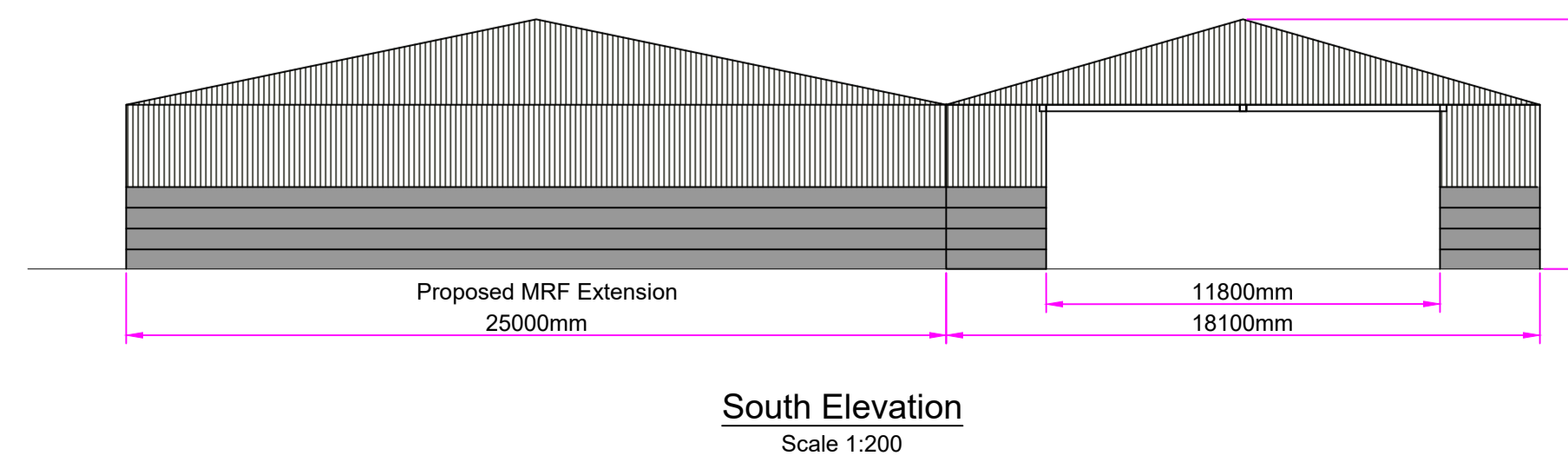
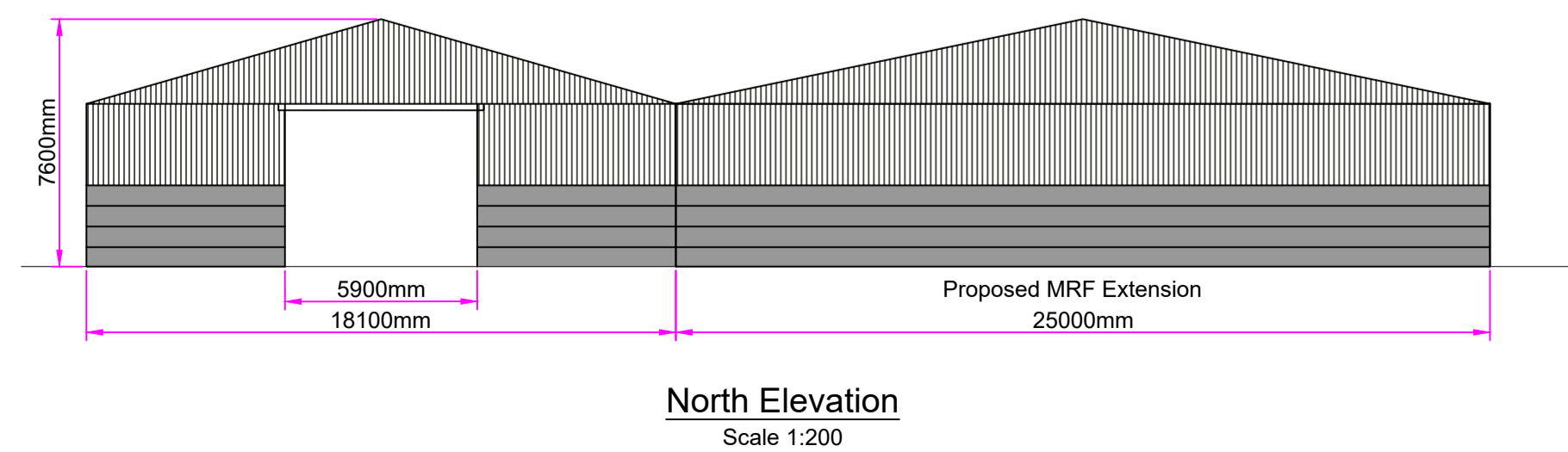
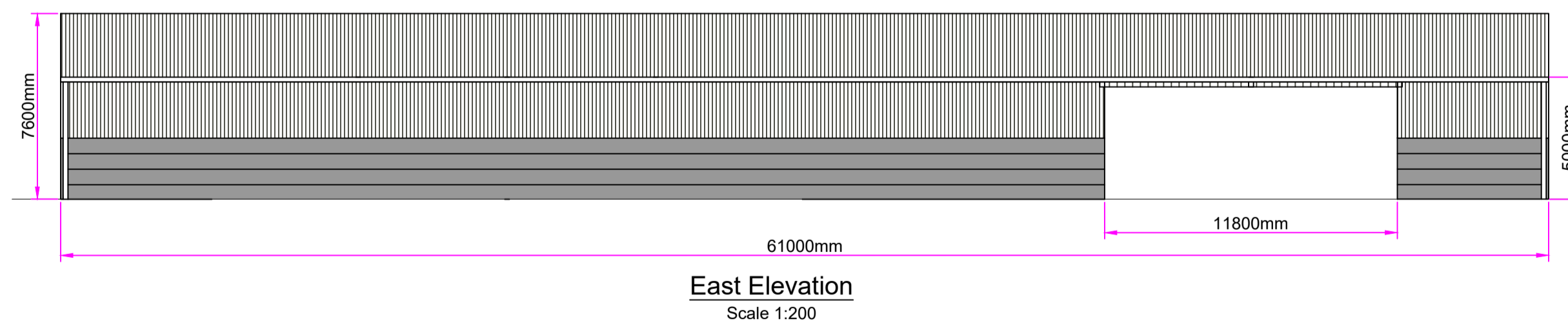
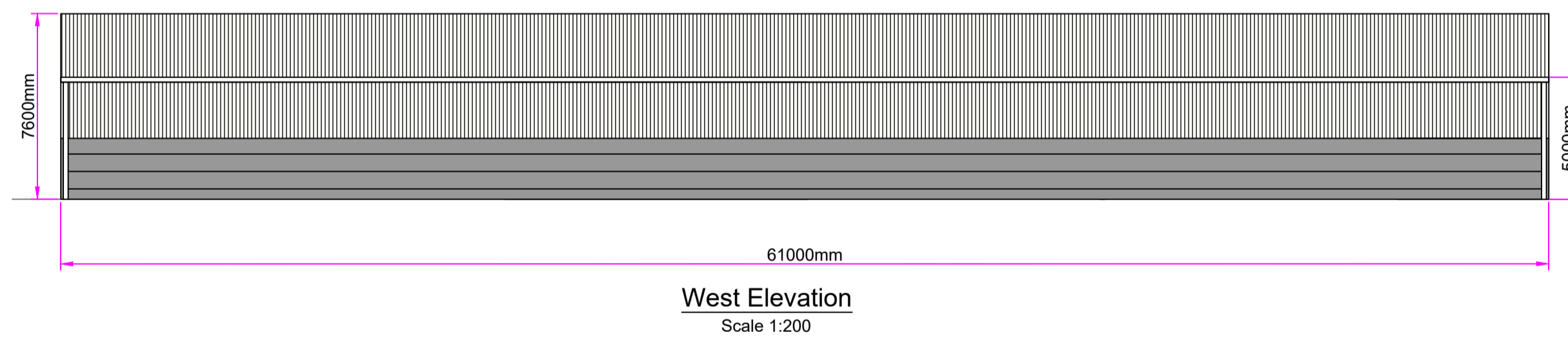
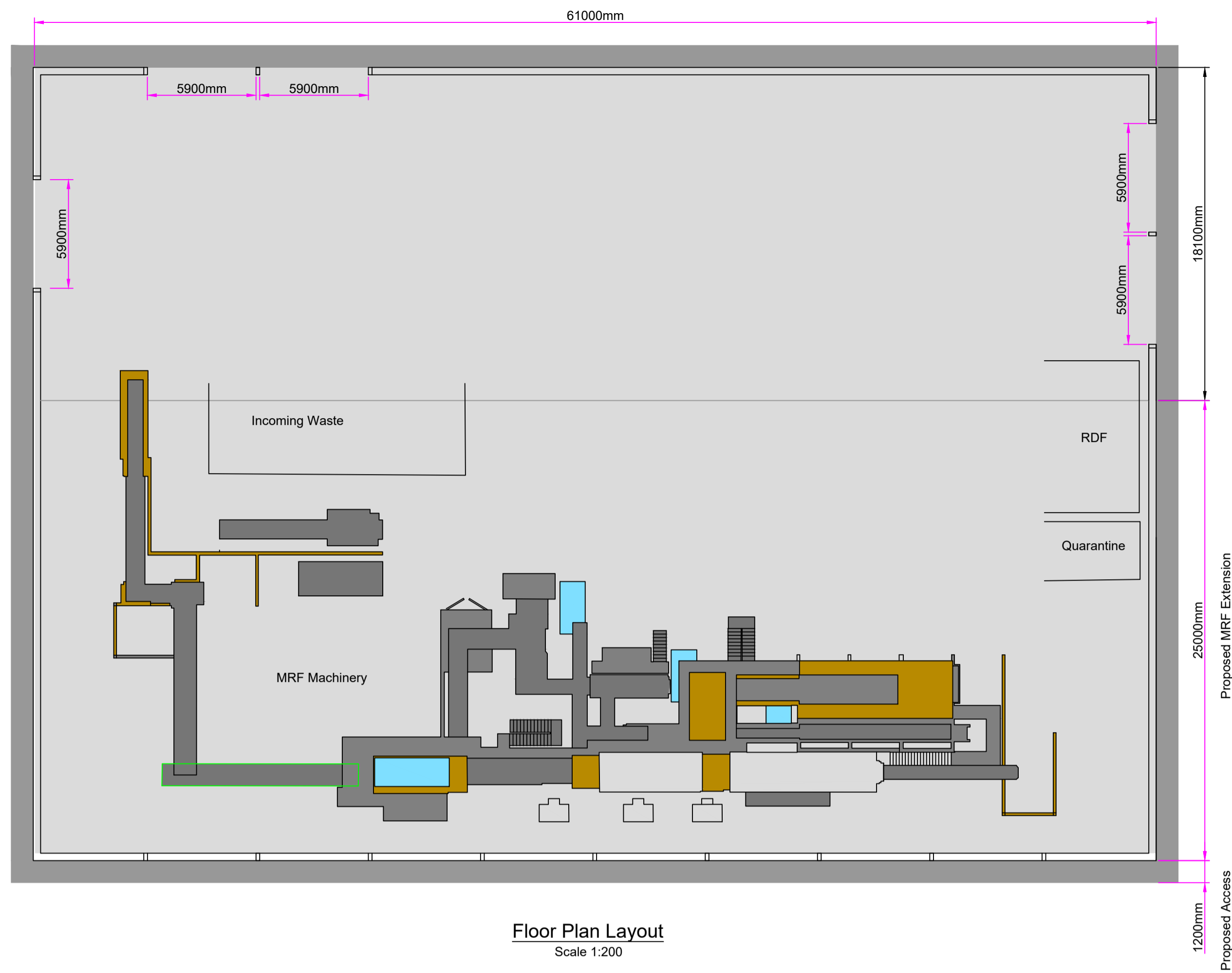
### APPENDIX 3 – COMPLAINT REPORT FORM

<b>Valencia – Complaint Report Form</b>		
Time and date of complaint reported:	Name and address of complainant:	How did you receive the complaint? Direct from Complainant; Via EA;                      Via EHO; Other:
Telephone number/email address of complainant :		

Complaint Type (e.g. noise, litter, odour, etc):	
Date of complaint (if different from above):	
Time of complaint (if different from above):	
Location the incident was noted (if not at the above address)	
Weather Conditions ( <i>i.e. dry, rain, snow, fog, etc</i> )	
Temperature (mild/warm/cold – or Degc)	
Wind Direction ( <i>e.g. from NE to SW</i> )	
Complainants description of the incident: <ul style="list-style-type: none"> <li>How is it described?</li> <li>When did it start?</li> <li>Is it constant/ intermittent?</li> </ul>	
Does the complainant want feedback?	
Any other relevant information?	
What was happening on site at the time of the complaint that might relate to the complaint?	
What were the operating conditions at the time of the complaint? <ul style="list-style-type: none"> <li>Is on site equipment functioning within acceptable parameters</li> <li>Are there any breakdowns that might attribute to the complaint?</li> </ul>	
Did you undertake an off-site survey?	
Actions taken:	
Can you relate the complaint to operations on site at this time?	
Form completed by:	Date:                      Signed:



**APPENDIX 4 – DRAWINGS**



- Notes
1. Survey information provided by Valencia Waste Management Ltd.
  2. All dimensions in millimetres.
  3. Do not scale from this drawing.
  4. Any anomalies on this drawing should be brought to the attention of Egniol Consulting Ltd.

Rev	Modification	By	Chk	App	Date
A	Revised Building Layout	LE	GR	GR	03.04.24



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LL57 4DF  
Telephone: 01248 355996  
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**Valencia Waste Management Ltd**

**Heathfield Landfill Site MRF Extension**

**Proposed Building Elevations**

Drawn by	Checked by	Approved by
LE	GOJR	GOJR
Date	Date	Date
09.02.2024	09.02.2024	09.02.2024
Status	Scale @ A1	
<b>Draft</b>	AS SHOWN	

Drawing Number	Revision
<b>ECL.9983.D01.005</b>	<b>A</b>

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CAD File Path: C:\Users\Chloe\OneDrive - Valencia Waste Management Limited\Documents\Surveys\Valencia\Heathfield\Task 24040301 MRF - detail drawings\Heathfield MRF - Proposed Building Elevations.dwg

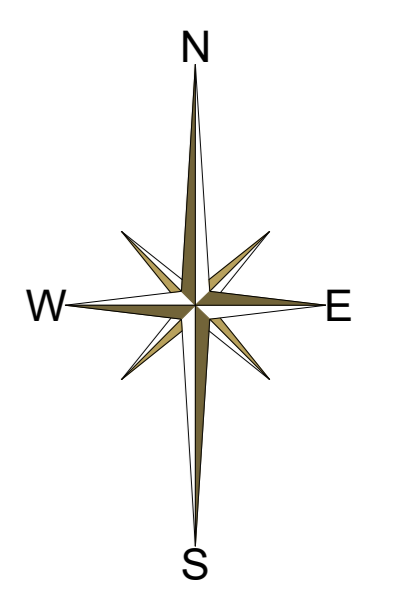
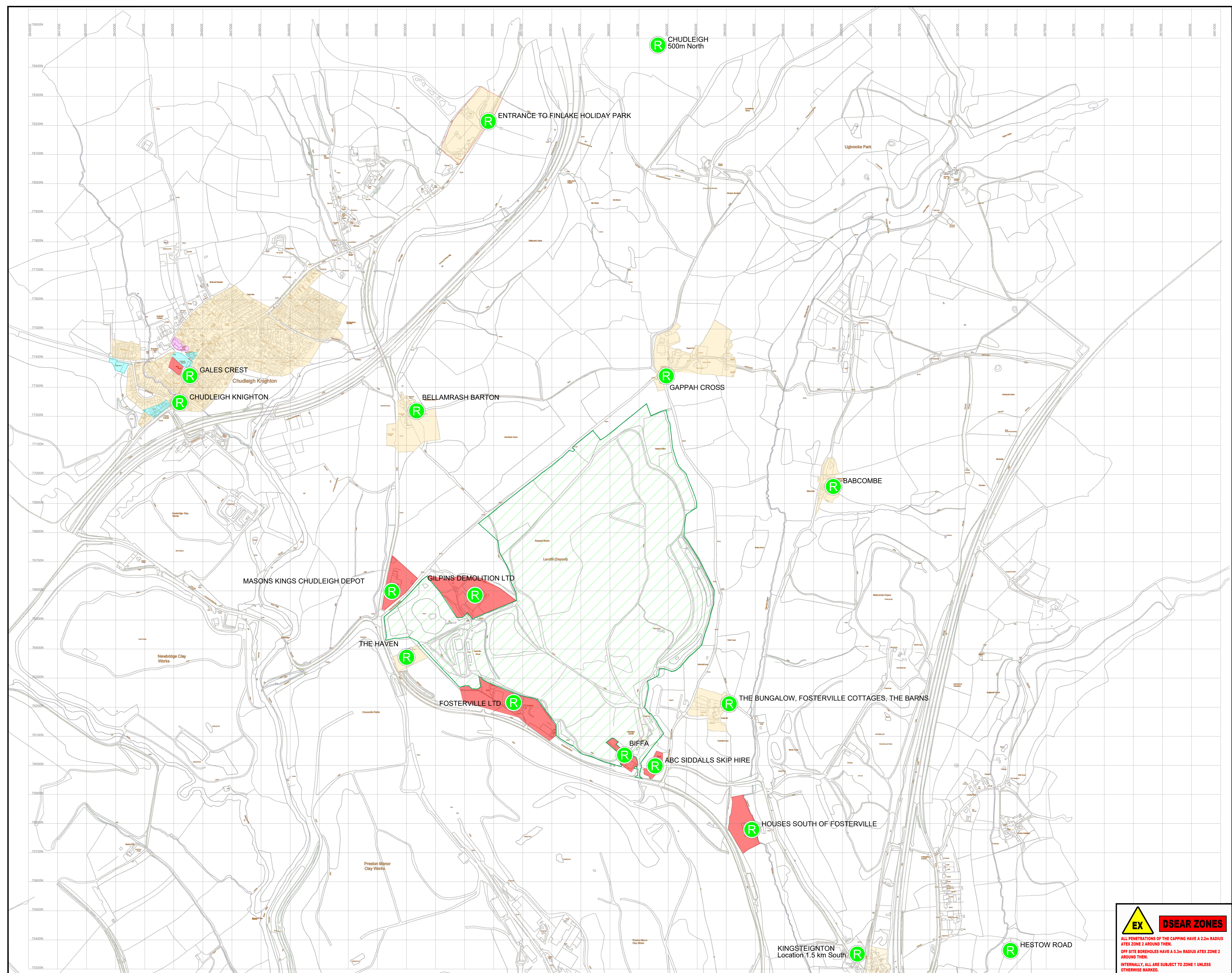


ROAD      FENCES

BUILDINGS      WATER

EP BOUNDARY

ODOUR RECEPTOR



SITE NAME		HEATHFIELD LANDFILL	
DRAWING TITLE		OMP ODOUR RECEPTOR PLAN	
DRAWING NUMBER		HEA3200	
TASK NUMBER		31463	

SCALE	N.T.S.	REVISION	C
ODRN	R.C.B.	R/DRN	R.L.Meadon
ODATE	03.05.2019	R/DATE	03.08.2023
ODAPP	C.R.	R/APP	L.Edmonds
OD/DATE	06.06.2019	R/DATE	03.08.2023

INFORMATION TAKEN FROM SURVEY SERVICES MASTER FILE OTHER DRAWINGS

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**EX DSEAR ZONES**

ALL PENETRATIONS OF THE CAPPING HAVE A 2.2m RADIUS ATEX ZONE 2 AROUND THEM.

OFF SITE BOREHOLES HAVE A 0.3m RADIUS ATEX ZONE 2 AROUND THEM.

INTERNALLY, ALL ARE SUBJECT TO ZONE 1 UNLESS OTHERWISE MARKED.

KINGSTEIGNTON  
Location 1.5 km South