

ODOUR MANAGEMENT PLAN

Brunel Road Industrial Estate, Newton Abbot TQ12 4PJ

Teignbridge District Council

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CONTENTS

DOCUMENT HISTORY:	I
CONTENTS	II
LIST OF TABLES:	IV
LIST OF FIGURES:	IV
LIST OF APPENDICES:	V
1 INTRODUCTION	6
1.1 GENERAL	6
1.2 SITE LOCATION	6
1.3 WASTE FACILITY OVERVIEW	7
1.4 WASTE TYPES AND QUANTITIES	7
1.5 SITE MANAGEMENT	8
2 ODOUR RISK ASSESSMENT	10
2.1 METHODOLOGY	10
2.2 ODOUR INTENSITY	10
2.3 RECEPTOR SENSITIVITY	10
2.4 SENSITIVE RECEPTOR LOCATIONS	10
2.5 LIST OF RECEPTORS	11
2.6 RISK MATRIX	13
3 POTENTIAL SOURCES OF ODOUR	14
3.1 WASTE STORAGE	14
3.2 FOUL SURFACE WATER	14
3.3 PROCESSING OF WASTE	14
3.4 BACKGROUND ODOUR SOURCES IN THE AREA	16
4 ODOUR CONTROL	17
4.1 WASTE ACCEPTANCE PROCEDURE	17
4.2 SITE OPERATIONS	17
4.3 RECEIVING WASTES	17
4.4 STORAGE OF WASTES	19
4.5 LOADING OF WASTES FOR EXPORT FROM SITE	20
4.6 HOUSEKEEPING	21
4.7 SITE INFRASTRUCTURE	21
4.8 LIAISON WITH NEIGHBOURS	22
4.9 TRAINING	23
4.10 SPILLAGE PROCEDURE	23
5 MONITORING (IF REQUIRED)	25
5.1 MONITORING ODOROUS RELEASES	25
5.2 OLFACTORY MONITORING	25
5.3 ODOUR MONITORING PROCEDURE	26
5.4 COMPLAINTS MONITORING/PROCEDURE	26
5.5 ODOUR DIARIES	27
6 CONTINGENCY PLANS	28
6.1 CONTINGENCIES AND EMERGENCY PLANS	28
6.2 CORRECTIVE ACTIONS FOR VARIOUS SITUATIONS	28

6.3	NORMAL OPERATION	29
6.4	ABNORMAL EVENTS	29
6.5	STAFF SHORTAGES/HUMAN ERROR.....	30
6.6	OPERATIONAL FAILURE	30
6.7	OMP MANAGEMENT.....	31

List of Tables

Table 1 - Accepted wastes with odour potential.....	7
Table 2 - Odour Intensity	10
Table 3 - Receptor sensitivity.....	10
Table 4 - Distances to Selected, Representative Sensitive Locations	12
Table 5 - Risk matrix.....	13
Table 6 - Other Odour Generating Operators.....	16
Table 7 - Waste storage / monitoring for odorous wastes on site	19
Table 8 - Corrective actions	29

List of Figures

Figure 1 - Wind rose from Newton Abbot weather station.....	11
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List of Appendices:

Appendix I - Drawings

Appendix II - Record Keeping Forms

Odour Complaints Report Form

Odour Diary

1 Introduction

1.1 General

- 1.1.1 Oaktree Environmental Ltd has been instructed by Teignbridge District Council to prepare an Odour Management Plan (“OMP”) for their waste transfer station at Brunel Road Industrial Estate, Newton Abbot TQ12 4PJ.
- 1.1.2 This OMP has been prepared to support a bespoke permit application and will allow Teignbridge District Council to implement an action plan should the site operatives detect an odour presence, receive complaints from local business or residents and if the EA suspects odour emissions from the site during an inspection.
- 1.1.3 This OMP has been produced in accordance with the following guidance:
- a) Environment Agency’s guidance: Develop a management system: environmental Permits (updated April 2023).
 - b) Environmental permitting: H4 odour management (published April 2011).
- 1.1.4 The site is operated in accordance with an Environmental Management System (EMS) along with other documents targeted to specific environmental considerations including this OMP.
- 1.1.5 This OMP will be stored within the site offices and electronically to allow easy access to the document.

1.2 Site Location

- 1.2.1 The site is located on Land at Brunel Road Industrial Estate, Newton Abbot TQ12 4PJ.
- 1.2.2 The site is surrounded by predominately industrial/commercial premises located on Brunel Road Industrial Estate as shown on Drawing No. 3312-001-01 the Sites Location Map. The sensitive receptors within proximity to the site are listed in Section 2.5.1 of this report and shown on sites Receptor Plan (Drawing No. 3312-001-04).

1.3 Waste Facility Overview

- 1.3.1 The site will be operated as a dry mixed recycling (DMR) waste transfer station and food waste bulking station, servicing the Councils own kerbside recycling collections.

1.4 Waste Types and Quantities

- 1.4.1 The locations of the operational areas are shown on the Site Layout & Fire Plan held in Appendix I.
- 1.4.2 The site will accept <25,000 tonnes of waste per annum for the treatment activity.
- 1.4.3 In the event that the site's capacity is reached, the site will divert material to an alternative site until volumes/tonnages have been reduced to suitable level, it is worth noting that this scenario is unlikely as material is loaded directly into the treatment plant.
- 1.4.4 Table 1 below details the EWC codes which can be accepted into the site. The wastes have been highlighted through the traffic light system based on likelihood to generate odour, those EWC codes highlighted in red are deemed the most at risk of generating odour (High), those highlighted in orange are considered medium risk of generating odour (Medium). Those EWC codes highlighted in green are considered the least at risk for generating odour (Low).

Table 1 - Accepted wastes with odour potential

Waste Code	Description	Odour Risk
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	Low
15 01 02	plastic packaging	Medium
15 01 03	wooden packaging	Low
15 01 04	metallic packaging	Medium
15 01 05	composite packaging	Medium
15 01 06	mixed packaging	Medium
15 01 07	glass packaging	Medium
15 01 09	textile packaging	Low

16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST	
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	Low
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15	Low
16 06	batteries	
16 06 04	alkaline batteries (except 16 06 03)	Low
16 06 05	other batteries excluding li-ion traction batteries	Low
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 cardboard	Low
20 01 02	glass	Medium
20 01 08	biodegradable kitchen and canteen waste	High
20 01 10	clothes	Low
20 01 11	textiles	Low
20 01 34	Batteries other than those mentioned in 20 01 33 not including li-ion traction batteries	Low
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	Low
20 01 38	wood other than mentioned in 20 01 37	Low
20 01 39	plastics	Medium
20 01 40	metals	Medium
20 03	other municipal wastes	
20 03 01	mixed municipal waste (co-mingled recyclable wastes)	High
20 03 02	waste from markets	High

1.5 Site Management

- 1.5.1 The site will have Technically Competent Managers (TCM) who will be responsible for the general management of the site including the acceptance and handling of any potentially odorous wastes.
- 1.5.2 The company, through the TCM (Mark Pepper), will ensure that a nominated deputy is sufficiently trained and familiar with all site management documentation (which includes

this OMP) in addition to all relevant company procedures who, in the absence of the TCM, will act the competent person.

2 Odour Risk Assessment

2.1 Methodology

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

2.2 Odour Intensity

- 2.2.1 Table 2 below highlights the intensity of the odour and provides a description by which to measure the intensity:

Table 2 - Odour Intensity

Odour Intensity	Criteria
Negligible	No detectable odour
Low	Faint odour (barely detectable)
Moderate	Moderate odour easily detected while walking, possible interference)
High	Strong odour (bearable, but offensive)
Severe	Very strong odour (this is when you really wish you were somewhere else)

2.3 Receptor Sensitivity

- 2.3.1 Table 3 below outlines the receptor sensitivity to odour which will be used when determining nearby odour sensitive receptors:

Table 3 - Receptor sensitivity

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

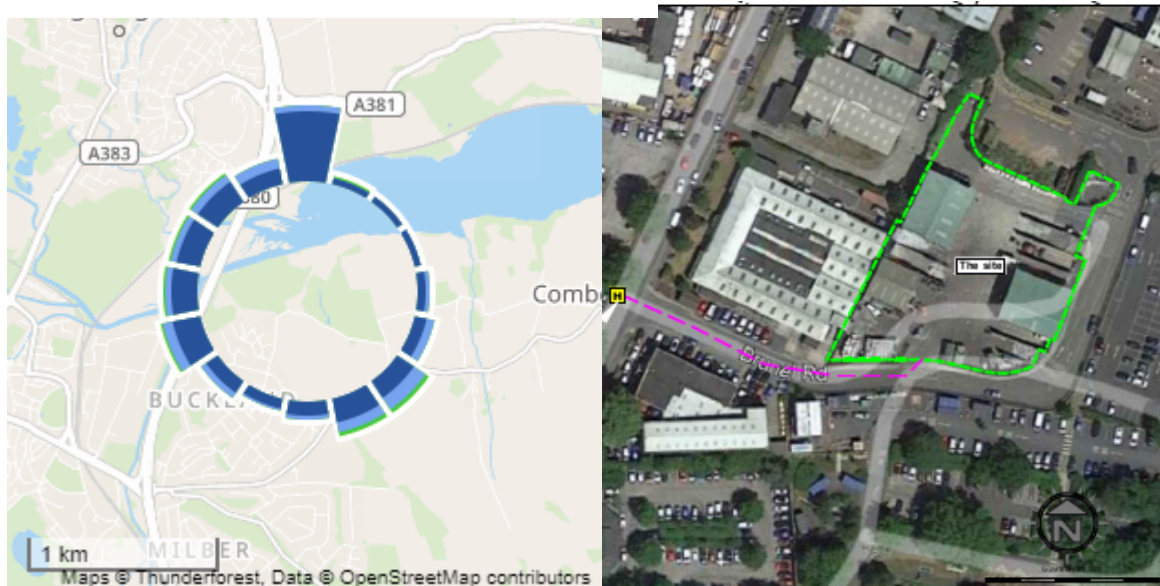
2.4 Sensitive Receptor Locations

- 2.4.1 The sensitive receptors within 2km of the site are shown on the Sites Receptor Plan in Appendix I.

2.4.2 The prevailing meteorological conditions at any site will be dependent upon many factors, including its location in relation to macroclimatic conditions as well as more site-specific microclimatic conditions. The most significant meteorological factor is the predominant wind direction and speed.

2.4.3 Wind speed and direction data have been obtained from Newton Abbot weather station for the period for the period of 05/2013- 02/2017, shown in Figure 1 below. This weather station is approximately 1.24km away from the site's boundary. The figure illustrated below shows the predominant wind direction for the site is from south to north (Northwards)..

Figure 1 - Wind rose from Newton Abbot weather station



2.5 List of receptors

2.5.1 The receptors listed from the SRP are also shown in Table 4 overleaf with approximate distances to these properties.

Table 4 - Distances to Selected, Representative Sensitive Locations

Receptor	Direction from Site	Approx distance from the site boundary to the receptor boundary (m)
Commercial / Industrial		
Drake Tooling & Abrasives Ltd	West	0
Dulex Decorator Centre	Northwest	10
Axiom Veterinary Laboratories Ltd	Southwest	40
Bupa Dental Care	Southwest	82
Visit South Devon	South	100
Residential		
Residential property (Queensway)	East	265
Residential property (Torquay Road)	South	360
Residential Property (Forde Close)	West	180
Schools		
Abbotsbury School	Southwest	420
All Saints Marsh Primary School	Northwest	660
Haytor View Community School and Nursery	East	430
Watercourses		
Aller Brook	East	65
River Teign	North	620
Infrastructure (major roads and transport links)		
A381	East	95
Torquay Road	South	295
Brunel Road	Running through the site	0
Ecological Sites		
Aller Brook (Local Nature Reserve)	East	65

2.5.2 Other receptors not shown in the above Table are illustrated on Drawing No. 3312-001-04.

2.6 Risk Matrix

- 2.6.1 The odour risk in any particular event can be established using the risk assessment matrix given in Table 5 below.

Table 5 - Risk matrix

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

3 Potential sources of odour

3.1 Waste Storage

- 3.1.1 Wastes will be stored within one of the sealed containers for the storage of food wastes accepted at the site, of which there are three. These containers will be monitored and the storage time for waste in these containers will not exceed 1 week. The containers are specifically designed for the storage of food wastes and are fully sealed unless being filled from the top. An empty container will be placed in the same location once removed. These are placed within a separate sealed drainage system which drains to foul sewer.
- 3.1.2 Other Malodorous wastes including the mixed plastic, can and glass will be stored within bays in the onsite buildings which are contained with concrete panelling on 3 sides in order to reduce the odour generated from these storage areas. The maximum storage time is 72hours which ensures that any residues from what was formerly contained by this packaging isn't likely to cause an odour nuisance. These bays are also washed down regularly once emptied to ensure no residues of food/liquids from containers leach onto the site surfaces.

3.2 Foul surface water

- 3.2.1 The food waste containers in Area 14 are stored on an impermeable concrete pad equipped with surface gullies which then drains to foul sewer. All other wastes on site are stored within a sealed container or within a building and therefore it is considered no surface water draining to the onsite surface water drainage system will be in contact with the waste.

3.3 Processing of waste

- 3.3.1 The processing of waste on site consists of the use of manual sorting by hand and using the manual picking line, baling of mixed plastic/cans/cardboard, details of each of the processes are detailed below.

MANUAL AND PICKING LINE SORTING

- a) Co-mingled waste is tipped into the appropriate waste reception bay.

- b) This is then manually sorted to pick out any potential non-conforming waste.
- c) The waste within these bays is then fed into the feed hopper for the picking line and site operatives then manually separate the plastics and cans from the conveyor and ensure these are deposited into the below containers.
- d) The separated plastics and cans are then taken to the dedicated areas on the site before being fed into the baler for further storage.

BALING OF MIXED PLASTICS & CANS

- e) The deposit of mixed plastics and cans are held within Bays 8 and 9. These are then passed through the feed hopper at the back of the building with the onsite mobile plant (Manitou).
- f) These are then passed down the picking line through the conveyor and handpicked to separate the cans from the plastic packaging waste and deposited into bays or three 1,000 litre containers beneath. These containers are emptied before shutting down.
- g) The plastics and cans are then baled in the two balers located in the west building.
- h) These bales are then transported via on site mobile plant including the use of forklift and Manitou and stored in Areas 11-13 to await removal from the site.

BALING OF CARDBOARD

- i) The deposit of paper and cardboard is within Bay 10. This material is then passed through the feed hopper at the back of the building with the onsite mobile plant (Manitou).
- j) This is then passed down to the baler through the conveyor.
- k) The baler output is then deposited into Bay 5 where the bales are cleared before shutdown. These bales are then moved into Bay 6 via mobile plant to await removal from the site.

3.3.2 The processing of the above waste has the potential to result in odorous emissions; however, the risk of this occurring is considered to be low as the odorous materials will be predominantly contained within sealed containers and within covered 3 sided bays that are emptied regularly.

3.4 **Background Odour Sources in the Area**

- 3.4.1 Consideration has been given to other potential local off-site sources of odour. Other potentially odour emitting operators, sites or areas are tabulated below in Table 6.

Table 6 - Other Odour Generating Operators

Company/Source	Address	Type of Business	Approximate distance & location from site boundary (m)
N/A	Surrounding users on Brunel Industrial Estate,	Industrial and commercial	>0m / Surrounding
<i>Aller Brook</i>	East of the site	Watercourse	60m

- 3.4.2 There are a number of industrial and commercial premises surrounding the site, which will all have wheelie bins and/or skips stored externally which could generate a smell if not emptied regularly. Given the close proximity to Aller Brook located 60m east of the site boundary this could lead to some odour within close proximity to the site.
- 3.4.3 Odour release could also be the result of abnormal weather conditions, machinery breakdowns and human error.
- 3.4.4 In order to determine whether complaints are the result of activities from the site or from other nearby sites an odour complaints form will need to be completed in line with the company's complaints procedure which is attached in Appendix II.

4 Odour control

4.1 Waste acceptance procedure

4.1.1 Strict waste acceptance procedures are in place at the site as shown below and the following details will be recorded for every load deposited at the site:

- a) The date and time of delivery.
- b) The name and address of the waste producer.
- c) The detailed and accurate description of the waste including type, quantity (in tonnes and/or cubic metres) and EWC codes.
- d) How the waste is contained e.g. loose, container type.
- e) The carrier's name and address.
- f) Driver's name, signature and vehicle registration No.
- g) Signature or initials of person(s) producing/ accepting/ inspecting/ carrying the waste.
- h) Additional handling details/notes made by the driver after inspection of the load.
- i) SIC code of the premises which produced the waste (where relevant).
- j) Waste hierarchy declaration.
- k) Information on previous treatment of the waste e.g. manual or mechanical.

4.1.2 Any wastes identified during the incoming waste inspections which do not conform to site acceptance criteria will not be accepted.

4.2 Site Operations

4.2.1 Limiting odour from the facility can best be achieved through employing effective site management and good general practice. It is much easier to minimise odours in the first instance rather than dealing with problems when they occur.

4.2.2 The next section addresses the general site management guidelines and identifies specific procedures to mitigate against odorous emissions.

4.3 Receiving Wastes

4.3.1 The site will only be accepting <25,000 tonnes per annum (tpa).

- 4.3.2 The site will accept waste collections linked to the Council's own kerbside waste collections in mixed and pre-segregated form comprising predominantly glass, plastic, cans, paper and cardboard. Items which are pre-segregated will be bulked into various bays and mixed items will be sorted by hand and/or using the picking line and then separated recyclables will be baled using the two balers on site. The site will also accept other items such as food waste which will be bulked-up; batteries will also be accepted and stored in a covered area on site.
- 4.3.3 The waste storage is clearly shown on the Site Layout and Fire Plan held in Appendix I. All loads will be delivered to the site via the existing road network in the operators own refuse collection vehicles (RCV's).
- 4.3.4 The quantity of waste received at the site shall not differ from the existing exempt waste operation and not exceed an annual throughput of <25,000 tpa.
- 4.3.5 Apart from the food waste which is stored in specifically designed sealed skips within the containment area on site, all waste processing and storage is undertaken undercover within the buildings on site to ensure that no rainwater and surface run off from the site comes into contact with the waste on site and therefore the only discharge to the sewer network will be from rainwater from the roofs of the building and site surfaces.
- 4.3.6 The above measures will ensure that during routine operation, sufficient controls will be in place to control any potential for significant odour release during receipt/acceptance of wastes on-site for treatment.

Non-conforming/rejected wastes:

- 4.3.7 Strict waste acceptance procedures are in place at the site and are summarised below. The waste is delivered to the site via an existing access to the east and upon arrival all waste will undergo a visual inspection on arrival at the site. Once the vehicle has passed the initial inspection, the vehicle will be directed to the site banksman where the waste transfer documentation will be fully checked to ensure the waste matches the pre-acceptance information received.

- 4.3.8 Any wastes identified during the incoming waste inspections which do not conform to site acceptance criteria will not be accepted and will be removed/quarantined immediately to await safe removal from site. The EA will be contacted (where necessary) if non-conforming waste discovered is likely to lead to breach of permit conditions or potential risk of odour.
- 4.3.9 The site will be subject to the following procedures and thorough inspection following tipping to ensure the waste is compatible for further treatment. This inspection will be carried out by site operatives who are suitably trained in detection of the following:
- Pressurised vessels, hot loads
 - Wastes containing incidental batteries, in particular lithium-ion batteries
 - Oils or other flammable substances including, rags soaked in oils or chemicals etc.,
 - Light fibrous dusty wastes
 - The presence of other hazardous components i.e. batteries
 - The presence of other components which could lead to potential odour release
 - Gas cylinders, sealed containers

4.4 Storage of Wastes

- 4.4.1 As discussed, the site will not be storing potentially odorous waste for no longer than a week. The food waste that is brought to the site will be stored in sealed containers which will only be opened for the transfer of waste into the containers. The storage of food waste will be regularly monitored and when the container reaches close to its maximum capacity, then the container will be removed and replaced with a new empty container. The maximum storage capacity of food waste is 40m³ per container and therefore 120m³ if all three of the containers are full.
- 4.4.2 Table 7 below details a summary of the main waste types which will be accepted at the site and have the potential to cause odour.

Table 7 - Waste storage / monitoring for odorous wastes on site

WASTE COMPRISING OF FOOD WASTE AND MIXED PLASTICS AND CANS.	• Food waste stored in AREA 14 will be stored within a sealed container that will only be accessed from the top to fill in the container. • The maximum storage capacities of bays containing plastics and cans will be regularly monitored and not exceeded. • The maximum storage time for plastics/ cans will be <3 days and therefore the likelihood for any residues of food/liquid to cause odour will be reduced. • The waste is typically collected from the site of production within a sealed container and then deposited into the dedicated bay or container at the site, due to the frequency of the turnover of the wastes typically once per week for food wastes and 2-3 collections per week for plastic packaging it is considered that odour build up is not likely. • The plastics and cans may contain residues of food or drink so these wastes will be baled frequently and the bales be stored within a sealed and covered bay. • It is not anticipated that the site would accept a load into the facility which isn't suitable for discharge as all loads are checked at the site of production during collection to ensure it is the correct waste stream and compliant with the EP. If odorous wastes are accepted at the site and/or identified (outside of this EP's requirements) during Olfactory monitoring, the site will investigate, find the root cause and immediately remove the odorous load from the site to a suitable permitted facility.
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4.5 Loading of Wastes for Export from Site

4.5.1 The export of waste from site is detailed below which details the average monthly tonnage and the collection frequency of the waste:

- Glass- 360t, 4-5 collections per week
- Paper- 115t, 1-2 collections per week
- Aluminium- 7t, 1 collections per month (some months no collections at all)
- Steel- 19t, 1 collection per month (some months no collections at all)
- Plastics- 150t, 2-3 collections per week
- Cardboard – 320t, 3-4 collections per week
- Food Waste- 440t, 3-4 collections per week
- Textiles- 3t, collected daily, collected by van

4.5.2 Due to the frequency of collections it is considered under normal operating conditions the risk of odour release is very low.

4.6 Housekeeping

- 4.6.1 Regular cleaning of operational areas and the treatment plant will be carried out to discourage odour generation. Site management will be responsible for checking operational staff have carried out suitable daily checks in line with the procedures outlined in this OMP.
- 4.6.2 In addition to daily visual monitoring of the site; site management will monitor the integrity of plant/tanks on a quarterly basis. In the event that there are any issues resulting in odour escaping, then maintenance works will be initiated within 24 hours, completion of repairs will depend on the availability of suitable contractors.
- 4.6.3 A housekeeping schedule has been produced below, and site management will train operational staff via toolbox talks every 6 months or sooner if site operations change to ensure the following housekeeping schedule is strictly adhered to.
- Avoid fugitive odorous emissions through good housekeeping
 - Maintain a clean, well-organised site
 - Clean equipment that has been in contact with odorous materials
 - Carry out a deep clean of the storage areas and record this in the site diary
 - Concrete floors draining appropriately and slopes / catchment pits are functioning
 - Floors are sealed to prevent absorption and adsorption of odour producing residues.
 - Waste storage containers shall be robust, easily cleanable, designed for safe handling, and constructed to prevent wastes escaping during storage. If such equipment is used to store other wet or liquid producing wastes, or wastes composed of fine particles, such equipment shall in all cases be non-absorbent and leak-resistant.

4.7 Site Infrastructure

- 4.7.1 The site deploys the following measures ensuring odours do not escape beyond the site boundary.
- **Monitoring** – The site will carry out Olfactory/Sniff assessments which have been outlined further in Section 5 of this OMP.

- **Stock rotation** – All potentially odorous wastes stored on site are stored for no longer than 72 hours which the low storage time reduces the risk of odour build up.
- **Housekeeping** – The site will carry out regular cleaning (minimum once daily) of all operational areas at the site paying special attention to storage areas for odorous wastes.
- **Storage procedures** – All odorous wastes are contained either within containers or within covered 3 sided bays.

4.8 Liaison with Neighbours

- 4.8.1 In the unlikely event of significant but temporary odour releases outside normal operations, neighbours will be contacted to advise them of what is occurring, and the action being taken. The Environment Agency (EA) will also be notified.
- 4.8.2 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.
- 4.8.3 If any odour complaints are received, the complaint will be assigned to an operative familiar with the site operations who will complete a 'complaints and events log' which will be detailed individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). Odour complaints will be investigated and responded to within 24 hours and suitably reviewed by the site manager who is ultimately responsible.
- 4.8.4 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint. If there

are significant odour releases outside normal operations, the operator will cease operation, investigate and resolve the issue before recommencing normal operations.

4.9 Training

- 4.9.1 All employees and sub-contractors of Teignbridge District Council involved with potentially odorous materials and their handling (including office/admin workers) allocated to undertake the Olfactory (Sniff) test) and complaint reporting.
- 4.9.2 Training will be given to all relevant persons to make sure they are competent in completing olfactory assessment survey forms, odour complaint report forms and the odour diary to ensure sufficient monitoring of odours can be carried out.
- 4.9.3 Operational staff will receive spillage training including the containment of odorous wastes.
- 4.9.4 Refresher training will be carried out on an annual basis or in the event of breach resulting in an odour complaint. All training will be recorded in a Site Diary. All records of induction training, refresher training, olfactory training, qualifications etc. will be kept in the site office or electronically.
- 4.9.5 Site management will be responsible for ensuring that all staff receive the OMP training detailed above.

4.10 Spillage Procedure

- 4.10.1 Liquid waste will not be accepted at the site however food waste which can potentially generate liquid will be stored in a sealed container and any movement of the container the site will ensure the container is placed in the same place on site at all times. Food waste is stored on a concrete pad with a sealed drainage system which includes a series of slot drains which subsequently drain to the foul sewer network.
- 4.10.2 If any oil and vehicle maintenance chemicals are kept on site, they will be stored securely in receptacle containers.

- 4.10.3 In the unlikely event of a spillage at the site during the unloading operation into the plant, a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably permitted facility.
- 4.10.4 In the unlikely event that one of the onsite containers or trucks delivering the loads to the site fails and results in a spillage or leak, the site has been engineered to ensure that all water drains towards the low point of the site as demonstrated on the Site Layout & Fire Plan held in Appendix I; drain mats/plugs will be initiated/placed onto all gullied with a polyboom along the site exit to ensure that any pooling water does not egress from the site. This will remove a potential pathway to any protected species, habitats, wildlife sites, groundwater or surface waters.
- 4.10.5 All site surfaces will be inspected daily for the presence of spillages or leaks when the site is in operation, an inspection will be carried prior to cessation of works to ensure no spillages or leaks from tanks/containers are present. Debris will be swept as required and placed in a skip and sent to a suitably permitted site. Any wastes which would be classified as having the potential to cause odour will be quarantined and stored in a sealed container prior to the safe removal from site to an alternative facility permitted to accept those wastes.

5 Monitoring (if required)

5.1 Monitoring Odorous Releases

5.1.1 **On-site** – As there are several members of staff working at the site, it is considered at least one of these staff members would be able to detect if any odour is present on site, this would be usually office staff who are not continually exposed. If a non-operational staff member identifies an odour, they will report this to site management and then the procedure shown in section 5.2.3 will be followed. This would ensure the odour problem can be investigated on site prior to a potential odour complaint.

5.1.2 Teignbridge District Council will use the following techniques to monitor odorous releases if a complaint has been made to the company:

- a) Olfactory Monitoring
- b) Complaints Monitoring
- c) Odour Diaries (when necessary)

5.2 Olfactory Monitoring

5.2.1 Odour will be monitored if there is a spillage of potentially odorous material, if an odour is detected on-site or in the event of odour complaint arising. In the event of such occurrence, the site supervisor will monitor odour around the entire site perimeter and an Odour Diary will be completed (Appendix II). The monitoring will be carried out at intervals whilst the site is operational, additional monitoring may be carried should an odour problem persist.

5.2.2 The results of monitoring exercises and any remedial action taken will be entered into the logbook which is available for the EA to inspect upon request. The name of the site supervisor will be stated in the site's diary / inspection form for each day of operation along with notes on weather including precipitation, temperature, wind speed and direction (from Met Office information).

5.2.3 Should the monitoring conclude that a certain activity/waste is giving rise to odour which is migrating offsite, steps will be made to reduce the impact of this activity, which may include,

but is not limited to; removal offsite to a suitably permitted facility, faster processing/lower storage rates, pumping and removal of standing surface water, removal of waste to a more suitable area of the site etc.

5.2.4 The site supervisor will be suitably trained to carry out these duties.

5.3 Odour Monitoring Procedure

5.3.1 Olfactory (Sniff) testing will be carried out by trained, competent staff. Assessments will be carried out in response to specific complaints or should the site operator detect odour on-site.

5.3.2 Prior to carrying out a routine odour check, the nominated member of staff will vacate the site for a period of 30 minutes and then carry out the assessment on their return to ensure they are not desensitised to the odour.

5.3.3 The assessor should not:

- a) Smoke or consume strongly flavoured food or drink for at least 30 minutes before the assessment.
- b) Consume confectionary or soft drinks immediately before the assessment.
- c) Apply scented toiletries, such as perfumes or aftershave immediately before an assessment.

5.3.4 Starting points of assessments should be downwind of the site, progressing towards the site boundary and then away from the site in an upwind direction. The person carrying out the assessment should walk slowly and breathe as normal. The points have not been provided on the site plan due to the regular variations in wind speed and direction.

5.4 Complaints Monitoring/Procedure

5.4.1 All odour complaints will be investigated promptly, and appropriate remedial action will be taken if the complaint is validated. Complaints will be recorded on the form found in Appendix II.

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

5.5 Odour Diaries

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

6 Contingency Plans

6.1 Contingencies and Emergency Plans

6.1.1 In accordance with the EA's guidance on OMPs, contingency plans have been prepared to react to situations 'where monitoring indicates that a potential odour source is not completely under control, meteorological conditions are unfavourable or that adverse impact has occurred'.

6.1.2 If excessive odours are detected at the site boundary, other monitoring point or a complaint is received, the following remedial procedures will be taken:

- a) Firstly, identify the odour source; is it from:
 - i) Site operations; or,
 - ii) An off-site source (e.g agricultural spreading operation, other industrial sources)
- b) If on site:
 - i) Report incidence to the site manager or technically competent manager;
 - ii) Identify the point of release of the odour;
 - iii) Identify the cause if the release i.e. machine breakdown, leakage, etc.;
 - iv) Identify a solution;
 - v) Implement a solution;
 - vi) Carry out olfactory tests to check if fix is working;
 - vii) Record actions taken on relevant forms and site diary as required by this plan

6.1.3 Then, reference should be made to the next section for actions taken if odour is being produced on site, to identify an appropriate solution.

6.2 Corrective Actions for Various Situations

6.2.1 Table 8 below summarises the various problems likely at the site and the standard responses available, which will assist in reducing odour potential.

Table 8 - Corrective actions

Process/Event	Problem	Corrective Action
Normal operation	Excess odour	See section 6.3 for corrective actions required
Abnormal operation, eg adverse weather conditions	Adverse weather conditions resulting in increased odour risk at sensitive receptors	See section 6.4 for corrective actions required
Staff shortages/human error	Staff shortage due to absence/no-shows	See section 6.5 for corrective actions required
Operational failure	Operational failure such as machine/plant malfunction/failure leading to odour issues	See section 6.6 for corrective actions required
Waste Loading/unloading	Accidental Spillage	Follow identified spillage procedure to contain odour release (see Section 4.11)
Stored wastes	Odorous emissions detected	Olfactory/SNIFF test required to pinpoint source. Ensure procedures outlined in Section 5 are adhered to in full. Implement liaison program if risk deemed HIGH or VERY HIGH i.e. strong or severe
Waste processing plant and machinery	Malfunction of plant/equipment leading to excess odour	Process to cease until issue is rectified

6.3 Normal Operation

- 6.3.1 In the event that excess odour is detected during normal/routine operation, the offending odour will be traced and the reason for the cause of the problem will be investigated. Once solutions are in place, olfactory monitoring will be carried out to ensure the solutions put in place are having the desired effect.

6.4 Abnormal Events

- 6.4.1 Adverse weather conditions can promote generation of odour and inhibit its effective dispersion e.g. hot weather with little wind, resulting in increased risk of odour to receptor locations. If this happens, operational intensity will reduce until more favourable meteorological conditions return.

6.5 Staff Shortages/Human Error

- 6.5.1 In the event of unforeseen staff shortages arising from illness, suspension or no shows, the operator will make a judgement whether to reduce the number of incoming loads, thus reducing processing frequency and storage of potentially odorous wastes. The operator will then seek to increase staffing levels within a timely manner to ensure the site can continue to operate at its required capacity.
- 6.5.2 All staff will be trained and undergo toolbox talks every 6 months (or sooner if operations change) to reduce the impact of human error. In instances where a human error has caused an odour issue, the site may suspend operations until the issue has been rectified, and the member of staff will be warned and re-trained accordingly.

6.6 Operational Failure

- 6.6.1 The manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures, which result in the closure of the site, will be recorded in the site diary.
- 6.6.2 All repairs to site security will be made within 24 hours of discovery of the damage if possible and the site will be made secure until the repair has been carried out.
- 6.6.3 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found, where possible. If a repair is not possible by the end of the working day and a potential breach of permit conditions may occur, the EA will be contacted to agree a suitable timescale for repair.
- 6.6.4 All defects and problems likely to give rise to odour will be recorded on the form or the operators own recording procedures with repairs/solutions being carried out immediately. Neighbours will be alerted if the problem cannot be rectified immediately and provided a timescale for when the problem will cease.

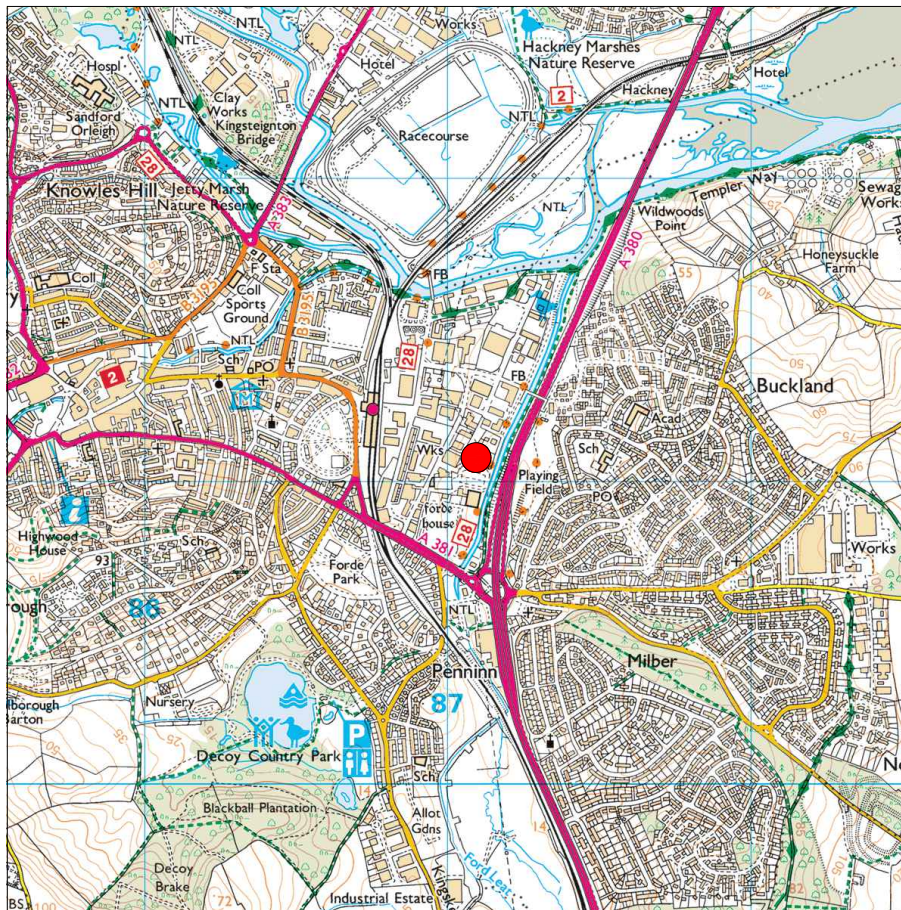
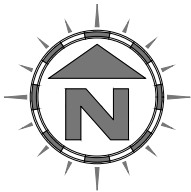
6.6.5 Essential spares for plant maintenance will be kept on site.

6.7 OMP Management

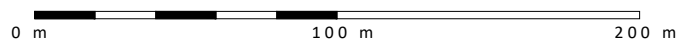
6.7.1 This OMP will be reviewed at least annually unless it becomes apparent that the activities are giving rise to pollution outside the site due to odour, in which case it will be revised sooner within a timescale agreed with the EA and a copy forwarded to the EA for approval before implementation.

Appendix I

Drawings



Scale Bar (1:2,500)



NOTES

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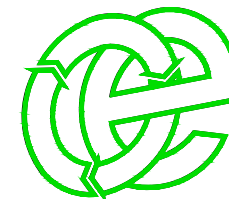
REVISION HISTORY

Rev:	Date:	Init:	Description:
-	01.12.23	JH	Initial drawing

KEY:

 Site location

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
SITE LOCATION MAP

CLIENT
Teignbridge Council

PROJECT/SITE
Brunel Road Industrial Estate, Newton
Abbot TQ12 4PJ

SCALE @ A4 1:2,500	CLIENT NO 3312	JOB NO 001
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DRAWING NUMBER 3312-001-01	REV -	STATUS Issued
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DRAWN BY JH	CHECKED RS	DATE 01.12.23
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t: 01606 558833 | e: sales@oaktree-environmental.co.uk

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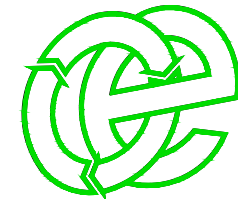
REVISION HISTORY

Rev:	Date:	Init:	Description:
-	01.12.23	JH	Initial drawing

KEY:

 Permit boundary

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
PERMIT BOUNDARY PLAN

CLIENT
Teignbridge Council

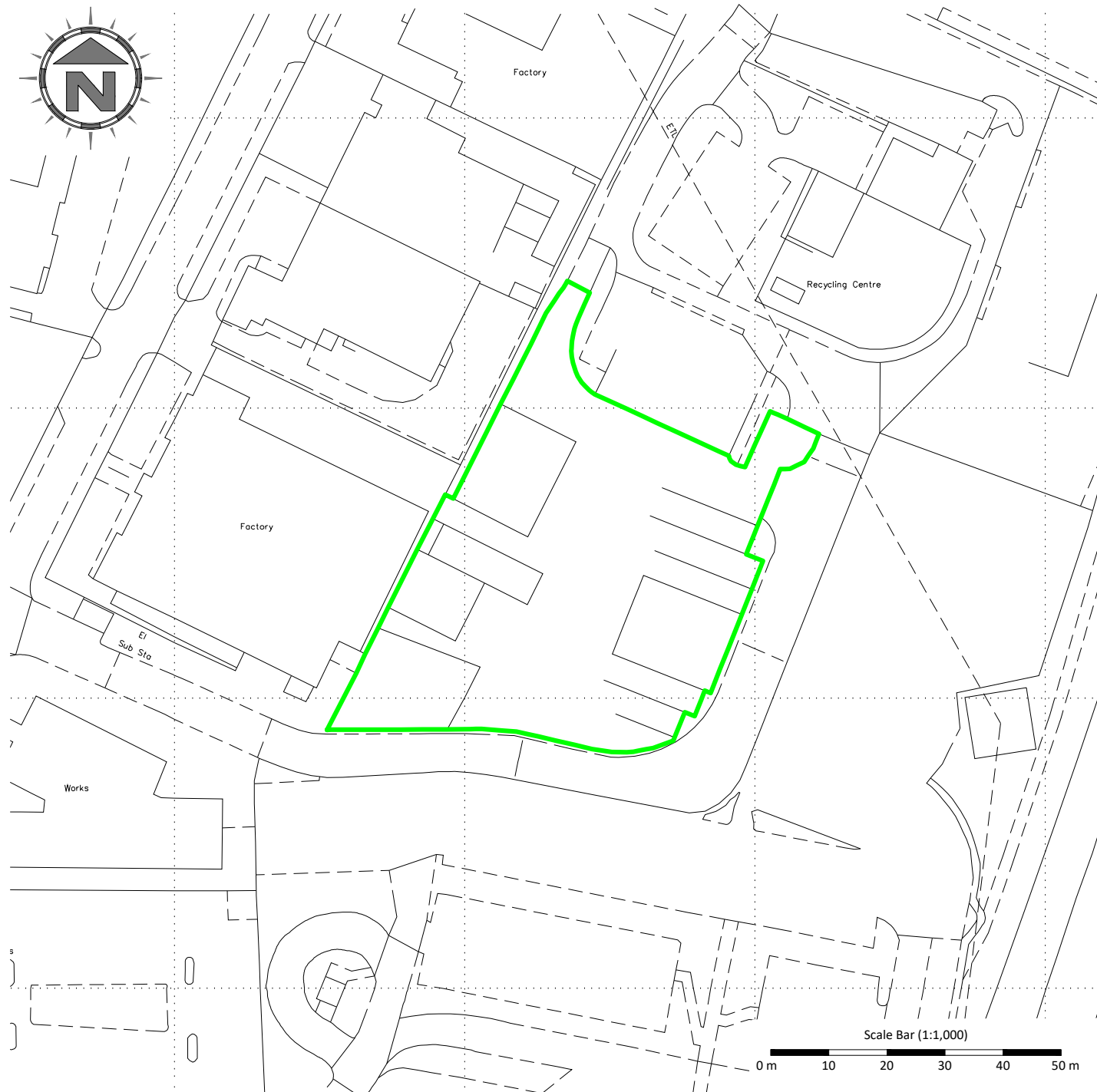
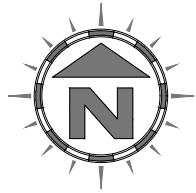
PROJECT/SITE
Brunel Road Industrial Estate, Newton
Abbot TQ12 4PJ

SCALE @ A4 1:1,000	CLIENT NO 3312	JOB NO 001
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DRAWING NUMBER 3312-001-02	REV -	STATUS Issued
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DRAWN BY JH	CHECKED RS	DATE 01.12.23
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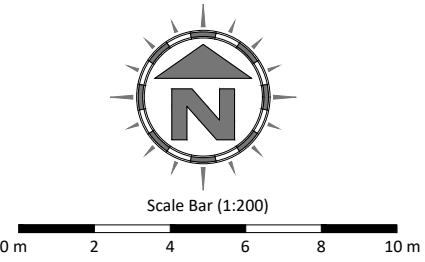
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REVISION HISTORY

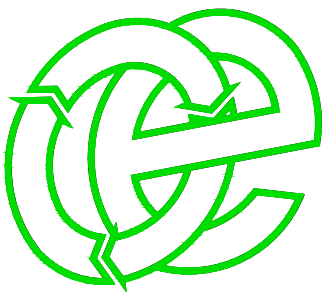
Rev:	Date:	Init:	Description:
-	15.04.24	JH/RS	Initial drawing
A	10.05.24	RS	Application submission
B	20.06.24	RS	Toilet block relocated
C	10.12.24	RS	Sandbag storage area added
D	30.01.25	JH	Buildings amendment

KEY:

- Permit boundary
- Waste storage areas
- General non-waste storage area
- Hazardous waste storage areas
- Transient storage areas (cleared before shutdown)
- Waste recycling building / covered area (with sealed concrete floor)
- Other buildings (office, workshop, welfare, etc.)
- Impermeable concrete surface (external)
- External yard area draining to foul
- Firewall with waste stored no higher than 1 metre below the heights of the wall
- U-channel surface drain/gully
- Slot drain
- Surface water drainage fall direction
- Gully
- Manhole
- Manhole to be shut-off in the event of a fire (x3)
- Surface water drainage pipe
- Foul drainage pipe
- Firewater containment area (calculated using landform modelling) water height set at 5.00 mAOD
- Sand bag barrier required in the event of a fire - to be constructed to height of 650mm minimum to achieve required containment for firewater
- Quarantine area
- Mains water point (hose reel)
- Fire extinguishers
- Fire blanket
- Plant shutoff location (indicative)
- Call points (break glass / horns)
- Spill kit
- Access route for emergency services
- Heat sensor (indicative)
- Smoke detector
- CCTV cameras
- Fire hydrant



Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
SITE LAYOUT & FIRE PLAN

CLIENT
Teignbridge Council

PROJECT/SITE
Brunel Road Industrial Estate, Newton Abbot TQ12 4PJ

SCALE @ A1
1:200

CLIENT NO
3312

JOB NO
001

DRAWING NUMBER
3312-001-03

REV
D

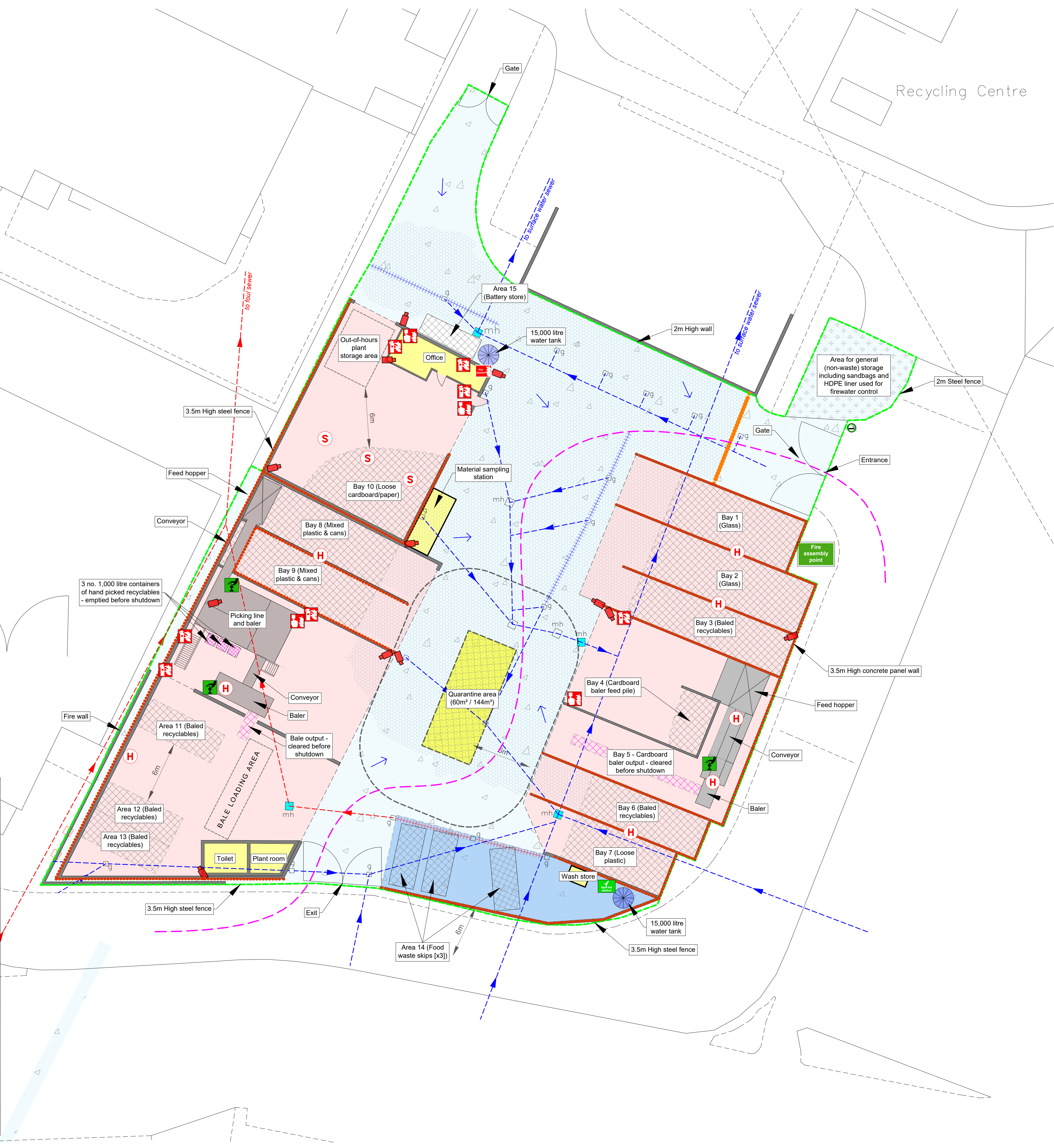
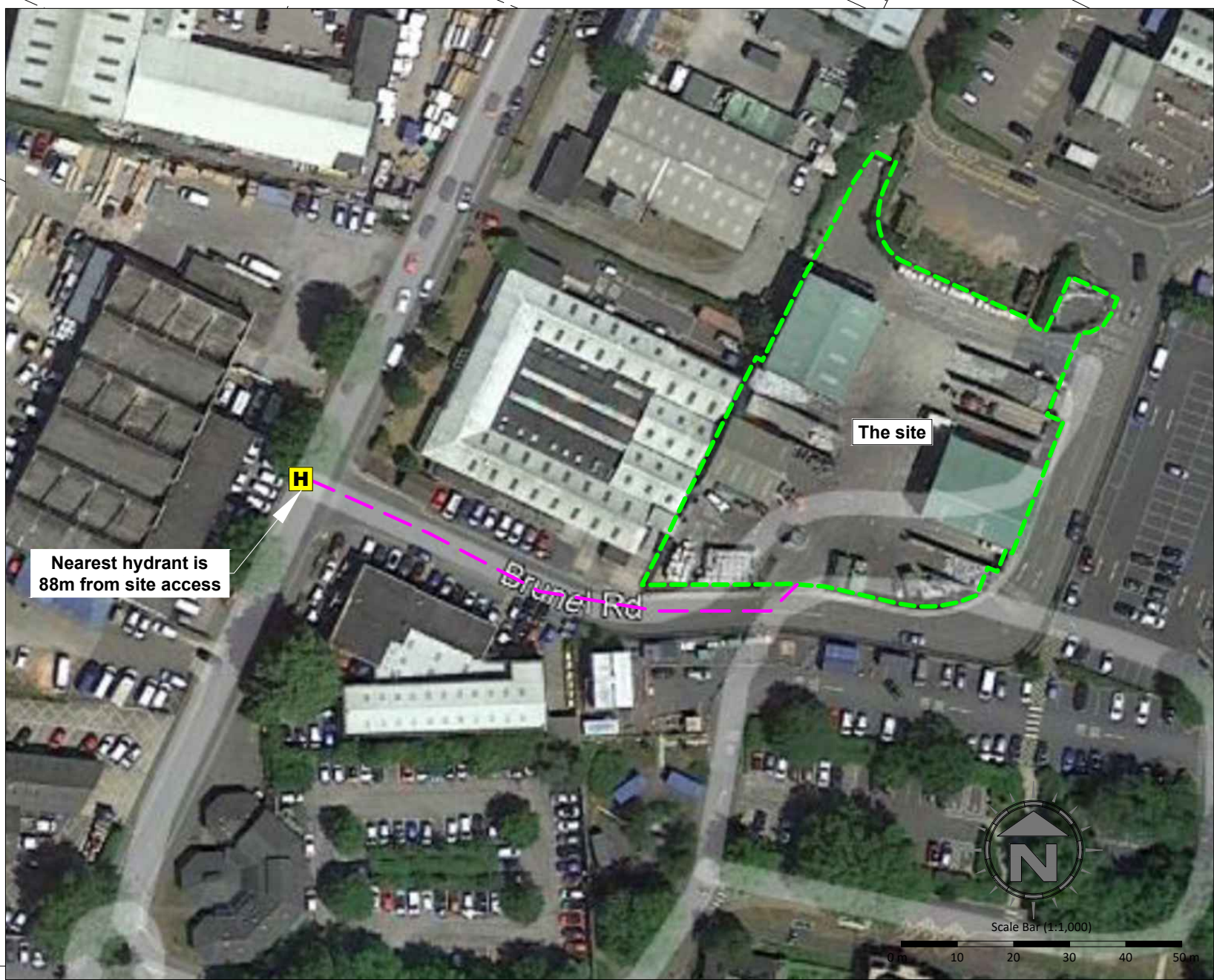
STATUS
Issued

DRAWN BY
JH/RS

CHECKED
RS

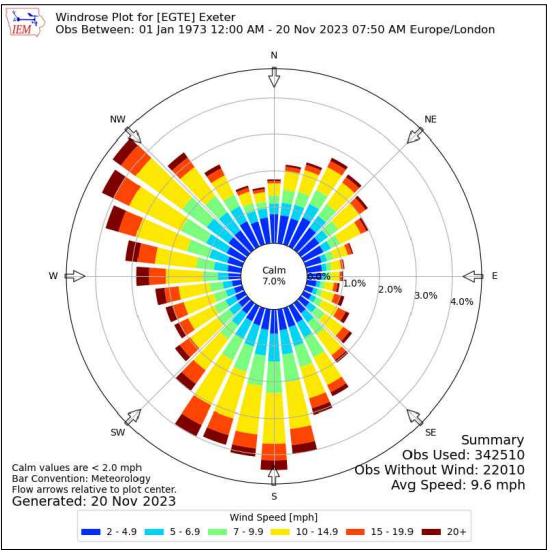
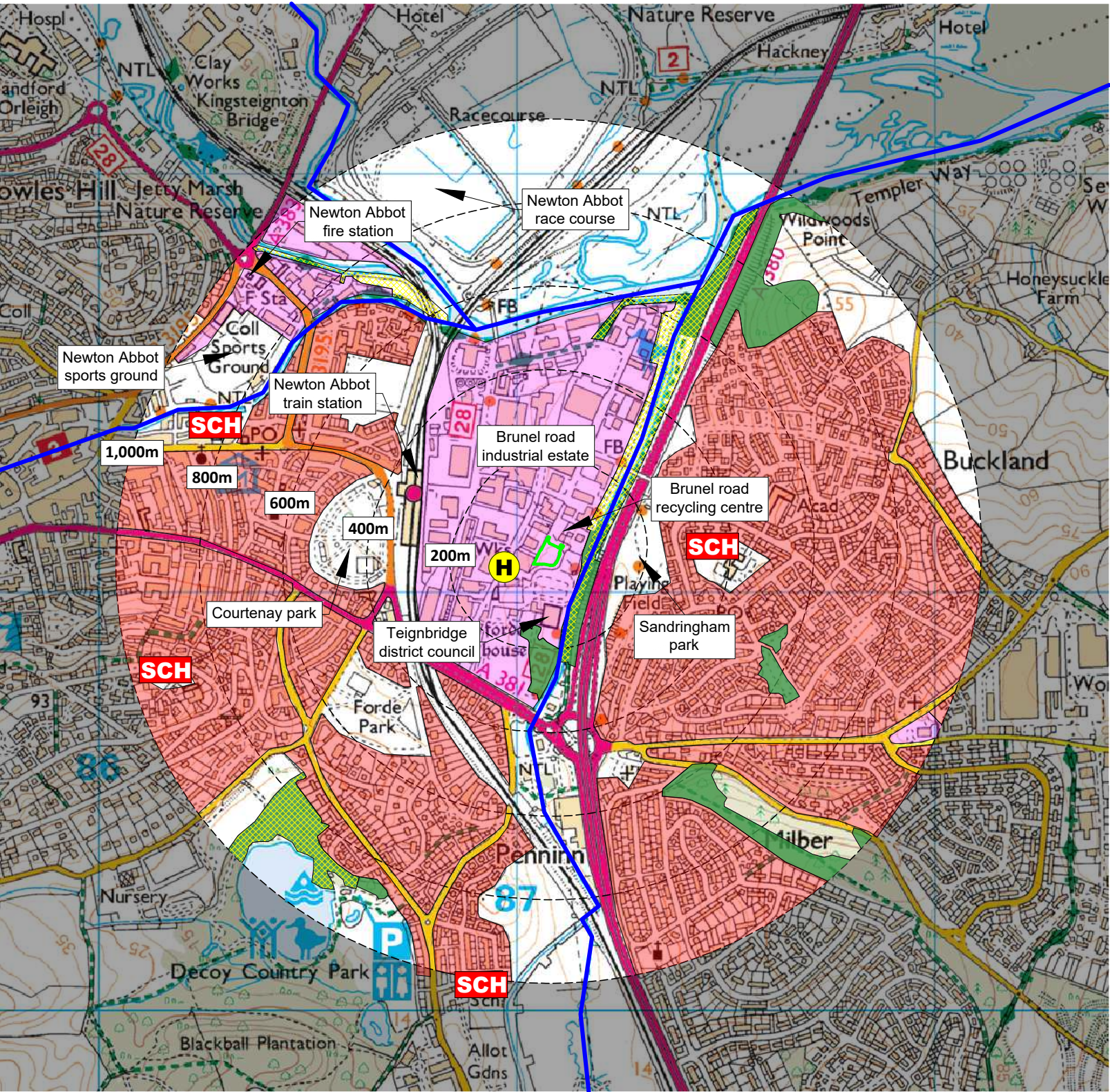
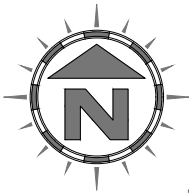
DATE
30.01.25

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KEY:

- Permit boundary
- Main River
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Class A, B, C roads
- Nearest fire hydrant
- Railway line
- School
- Woodland areas
- Priority habitat inventory (deciduous woodland)
- Nature reserves



Compass Wind Rose for (EGTE) Exeter Period 1973-2023
- source: Iowa State University

NOTES

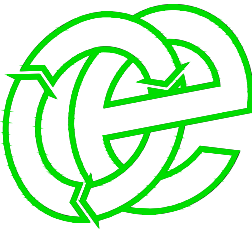
- Boundaries are shown indicatively.
- Wind rose data shows the prevailing wind direction to be Southerly.

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	01.12.23	JH	Initial drawing

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
RECEPTOR PLAN

CLIENT
Teignbridge Council

PROJECT/SITE
Brunel Road Industrial Estate, Newton Abbot
TQ12 4PJ

SCALE @ A3
1:12,500

CLIENT NO
3312

JOB NO
001

DRAWING NUMBER
3312-001-04

REV
-

STATUS
Issued

DRAWN BY
JH

CHECKED
RS

DATE
01.12.23

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Appendix II

Record Forms

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

Intensity (Detectability)

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

TEIGNBRIDGE DISTRICT COUNCIL
COMPLAINTS REPORT FORM (BRUN/RF/7)

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

COMPLAINT RECORDING PROCEDURE:

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

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

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