Hallenbeagle Transfer Station and Material Recycling Facility

Odour Management Plan

October 2023

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Document Details

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Document Review History

Date	Description	Summary of Changes
October 2023	Version 1.0	Original Document to support environmental permit application for a Refuse Transfer Station, Material Recycling Facility and a covered bale storage area.

Contents

Appendices

Figures

1 SITE DESCRIPTION AND GENERAL MANAGEMENT

1.1 Introduction

1.1.1 Hallenbeagle Transfer Station and Material Recycling Facility (the site) is located at Cornwall Business Park, Hallenbeagle, Scorrier, Redruth, TR16 5EN at National Grid Reference (NGR) SW 72700 44778. The site location and permit boundary are presented in Figure 1 and 2 respectively.

1.1.2 This Odour Management Plan (OMP) is written to support an application for an environmental permit to operate a Refuse Transfer Station (RTS) with physical treatment, Clinical Waste Transfer Station (CWTS) and a Material Recycling Facility (MRF) at the site

1.1.3 All SUEZ operations are certified to ISO 14001, ISO 9001 and ISO 45001 and operate under documented management procedures. All SUEZ operations are controlled by an Integrated Management System (IMS) as described in the Operations Management Plan (Document reference 1.2).

1.1.4 The OMP is to be reviewed as a minimum on an annual frequency by the Site Manager and the Environment and Industrial Risk (EIR) Manager to ensure it reflects the latest guidance, legislation and the site operations. As a minimum the OMP will be reviewed after a change of operations or after an environmental issue and following an accident on site or receipt of a complaint.

1.2 Guidance

1.2.1 This OMP is a working document, intended to be used as a reference document for operational staff on a day-to-day basis. SUEZ will implement the plan to ensure that all reasonable measures are taken to control odour emissions. If an adverse impact is identified, prompt action will be taken to identify the source and apply corrective measures. It provides a schedule of actions that will be taken to minimise odour impact and details site management procedures for the management and monitoring of odour.

1.2.2 The OMP has been prepared in accordance with the following guidance document:

- H4 – Odour Management Guidance.

1.2.3 The OMP will adopt a Source → Pathway → Receptor model with an emphasis on implementing effective and robust controls for odour abatement at the earliest stages possible (i.e. at source). The guidance acknowledges that assessment and control of odour can be difficult due to dispersal and the episodic nature of odour events.

1.2.4 The ‘H4’ guidance provides a regulatory framework by which a permitting officer can ensure compliance by the provision of specific conditions.

1.2.5 This document provides a summary of the physical and management controls that will be employed to minimise odour release. It provides a site-specific assessment of the potential sources of odour; the pathways odour can take from the site and the receptors it is likely to impact. The document also

outlines the control measures including monitoring and contingency actions to be deployed at the site to prevent or minimise odour.

2 DESCRIPTION OF WASTE ACTIVITIES

2.1 General Overview

2.1.1 The site will operate as an RTS with physical treatment, a Clinical Waste Transfer Station (CWTS) and a MRF. The combined waste acceptance limit for the site will be 140,000 tonnes per annum. The maximum combined annual tonnage for the RTS and CWTS shall not exceed 100,000 tonnes and the annual tonnage for the MRF shall not exceed 40,000 tonnes.

2.1.2 The RTS will provide a facility for the storage and 'bulking up' of household residual waste (general waste), food waste, bulky waste, street sweepings and fly tipped waste collected by Waste Collection Authorities (WCAs), plus residual waste from SUEZ's network of Household Waste and Recycling Centres (HWRCs). The RTS will also accept waste from third party trade customers.

2.1.3 Non-hazardous and inert waste will be treated as part of the RTS. Treatment activities within the RTS will consist of manual sorting and separation. Street Sweeping will also naturally dewater. To allow flexibility treatment within the RTS could also consist of screening, baling, shredding or compaction of non-hazardous waste for disposal or recovery.

2.1.4 The CWTS will provide a facility for the storage and 'bulking up' of offensive healthcare and clinical waste. There will be no physical treatment of waste as part of this activity.

2.1.5 The MRF will provide a facility for the physical treatment of recyclable materials for onward transport to re-processing facilities. Recyclable materials will derive from kerbside collections, third party trade customers and SUEZ's network of HWRCs and Transfer Stations. The treatment includes manual and mechanical sorting/separation, screening, baling, shredding, compaction or 'bulking up' of waste.

2.1.6 In addition, there is a covered bale storage area to store waste bales and loose recyclable materials from the MRF.

2.2 Permitted Wastes

2.2.1 The waste types permitted to be accepted at the site are detailed in the Storage Plan (Appendix B) in the Operations Management Plan (Document reference 1.2).

2.2.2 The site is designed to receive the following wastes: -

<u>Refuse Transfer Station</u>

- Household and commercial waste collected by WCAs including:
  - Household Residual Waste (general waste)
  - Food waste
  - Bulky waste
  - Street sweepings (subject to limited water content)
- Fly tipped waste
- Residual waste from HWRCs

- Third party trade commercial waste

Clinical Waste Transfer Station

- Offensive Healthcare waste
- Clinical waste

Material Recycling Facility

- Dry mixed recycling (containing plastic, paper, card and cans)
- Glass

2.3 Process Description

2.3.1 Waste is unloaded in two distinct areas; the RTS (with clinical waste storage) and MRF. Visiting traffic for both areas is directed (via signage and separate entrances).

2.3.2 Waste materials for the RTS will be delivered in a variety of vehicles and will be directed to the RTS area inside the main building. Waste will either end tipped directly into the bays or stockpiles or waste will be deposited on the hardstanding in front of the relevant storage area where a loading shovel or suitable plant machinery will be operated to move the material into bays, stockpiles or container. Materials in the RTS building will be stored and loaded for forward disposal or recovery.

2.3.3 Residual waste from households and third-party trade customers will be delivered in Refuse Collection Vehicles (RCVs) whereas residual waste from SUEZ's network of HWRCs will be delivered in roll-on/roll-off (RO-RO) containers.

2.3.4 Food waste will be delivered by RCV and stillage equipped vehicles.

2.3.5 Street sweepings will be delivered by street cleaning vehicles and roll-on/roll-off (RO-RO) vehicles and will be tipped into a bay where it will naturally dewater prior to onward transport to other processing facilities.

2.3.6 WEEE will be delivered to site on a variety of vehicles ranging from small vans to large rigid HGVs. Items will be manually unloaded, or utilising liftings aid where applicable into the designated storage areas.

2.3.7 Offensive health care and clinical waste will be delivered by box vans and RCVs. Healthcare and clinical waste will be stored within a designated storage area inside the main building.

2.3.8 Non-hazardous and inert waste will be treated as part of the RTS. Treatment activities within the RTS will consist of manual sorting and separation. Street Sweeping will also naturally dewater. To allow

flexibility treatment within the RTS could also consist of screening, baling, shredding or compaction of non-hazardous waste for disposal or recovery.

2.3.9 The material in the bays will be removed from the site using the site mobile plant and transferred into bulk haulage vehicles inside the main building. WEEE will be removed from site using a variety of vehicles including HGV's and RO-RO vehicles. Clinical waste is removed from site in wheelie bins which are manually moved into vans from the storage area.

2.3.10 Recyclable materials for the MRF will be delivered in a variety of vehicles including RCVs, bulk haulage vehicles or RO-RO vehicles and will be tipped on the floor in each bay. The materials will then be transferred onto the conveyor system for processing and will be baled (excluding glass) prior to storage on site. Bales of recyclable materials will be stored in the designated bale storage area prior to forward recovery.

2.3.11 An indicative site layout plan is presented in Figure 3.

3 SOURCE, PATHWAY, RECEPTORS CHARACTERISATION

3.1 Odour Source

3.1.1 The proposed activities are limited to the handling, treatment, storage and transfer of wastes, therefore the main source of odour considered by this report relate to these activities only.

3.1.2 The following table provides an inventory of all potential odour sources and the odour generating sources at the site.

Table 1 - Odour Source Inventory

Odorous and potentially Odorous Materials	Odour Potential	Maximum time on site	Location on site	Maximum quantity on site at any one time (approx.)	Source and age of waste on arrival
Food Waste **EWC codes** 20 01 08, 20 03 01 and 20 03 02.	Medium	24 hours during weekdays or 72 hours over the weekend and bank holiday	In Bays 8 and 9 within the transfer station building equipped with fast acting roller shutter doors as shown on Figure 3.	Approximate stockpile volume in Bay 8: 205.8 m^3 – assumed density factor 0.4. **Maximum quantity 82.3 tonnes** Approximate stockpile volume in Bay 9: 67.5 m^3 – assumed density factor 0.4. **Maximum quantity 27 tonnes** **Total quantity 109.3 tonnes**	Municipal waste from Kerbside collection. Up to 1 week old when arriving on site
Road Sweeping Materials **EWC codes** 20 03 03	Low – input materials will vary in composition throughout the year. During the spring and summer months, the materials will largely comprise aggregate, grit and sand. During the autumn and winter months the materials will comprise a larger proportion of organic material (e.g. leaves).	2 weeks	In Bay 7 within the transfer station building equipped with fast acting roller shutter doors as	Approximate stockpile volume in Bay 7: 222.75 m^3 – assumed density factor 0.4. **Maximum quantity 89.1 tonnes**	Municipal waste from WCA Up to 1 week old when arriving on site

			shown on Figure 3.		
General Municipal/ Residual black bag **EWC codes** 20 03 01 20 03 02	Medium	48 hours during weekdays or 72 hours over the weekend and bank holiday	In Bays 4 and 5 within the transfer station building equipped with fast acting roller shutter doors as shown on Figure 3.	Approximate stockpile volume in bay 4: 341.7 m^3 – assumed density factor 0.29. **Maximum quantity <u>99.1 tonnes</u>** Approximate stockpile volume in bay 5: 341.7 m^3 – assumed density factor 0.29. **Maximum quantity <u>99.1 tonnes</u>** **Total quantity <u>198.2 tonnes</u>**	Municipal waste from Kerbside collection Commercial waste from single source contract Up to 2 weeks old when arriving on site
Recyclable and Bulky Wastes	The potential for an odour source is negligible and as such is not discussed further in this OMP.				
Offensive and Non-Infectious Healthcare Waste **EWC codes** 18 01 01,18 01 04 18 01 07 18 02 01,18 02 03 18 02 06 20 01 99	Low	48 hours during weekdays or 72 hours over the weekend and bank holiday	In Bay 2 within the transfer station building equipped with fast acting roller shutter doors as shown on Figure 3.	Approximate stockpile volume in Bay 2: 107.2m^3 - assumed density factor 0.21. **Maximum quantity <u>22.5 tonnes</u>**	Residential and commercial properties Up to 2 weeks old when arriving on site
Clinical waste (Hazardous Waste) **EWC codes** 18 01 02	Low	1 week	Inside 6 sealed wheelie bins within Bay 2 located in	Total volume of 6.6m^3 stored in 6 sealed wheelie bins – assumed density factor 0.225 –	Residential and commercial properties

18 01 03* 18 01 09 18 02 01, 18 02 08			Transfer Station Building equipped with fast acting roller shutter doors as shown on Figure 3.	**Maximum quantity <u>1.5 tonnes</u>**	Up to 2 weeks old when arriving on site

3.2 Odour Pathway Characterisation

Overview

3.2.1 The principle mechanism for the transit of odorous emissions from site operations to adjacent sensitive receptors is via ambient air. The distance and direction that these emissions will be carried is determined by the following factors:

- Source Related Pathways
- Meteorological Conditions
- Topography

Source Related Pathways

3.2.2 The pathway that an odorous emission takes from a site may depend on the specific source term and/or location it arises from. The nature of the source related pathway could also influence the scale of the resulting impact on a sensitive receptor.

Meteorological Conditions

Wind Direction

3.2.3 The main controlling factor in determining the pathway of odour is the ambient meteorological conditions. This is fundamental to the transportation of odour to sensitive receptors.

3.2.4 Wind direction will determine which receptors will be affected and at what frequency. The data was obtained for Hallenbeagle. The prevailing wind direction is from the south west. A compass rose from meteoblue.com, with the prevailing wind direction, is included in Figure 4.

3.2.5 Areas most at risk from an odorous emission, should it occur, are therefore located north east of the site which is predominately open grass land.

Wind Velocity

3.2.6 Wind velocity will affect the distance an odour emission will travel. Conversely, increased wind speed could also beneficially improve dispersal. However, those receptors closest to the site are still at the highest risk of a negative impact.

Air Temperature

3.2.7 Warm air may carry odours upwards by convection for dispersal away from the site. However, warm weather will encourage the onset of biodegradation of exposed or temporarily stored wastes and therefore increase odour potential.

Adverse Weather Conditions

3.2.8 Unusual weather conditions may increase the risk of odour emissions from the site. Site staff will be vigilant to unusual trends in the meteorological data or forecasts which may indicate strong winds or extremes of temperature which may cause a potential problem. The types of weather conditions that may impact on odour generation and emissions and appropriate contingency actions are detailed in Section 5 below.

3.3 Odour Receptor Characterisation

3.3.1 The site is situated approximately 3.5km to the north east of Redruth town centre. Access to the site is from one of the Business Park roads which connects to the A30 via an overbridge and short section of road which serves some of the businesses at Scorrier. The Business Park Road forms the eastern boundary of the site. The main line railway forms the western boundary to the site, with the A30 dual carriageway just beyond this. The closest residential receptor is located approximately 25m north off Hallenbeagle Bridge Road.

3.3.2 A Nature and Heritage Conservation Screen (Reference Number EPR/LB3906HB/A001) was requested from the Environment Agency. This screen determines the presence of any sites of nature and heritage conservation, or protected species or habitats that may be impacted by the proposal. The results of the screen indicate that there are no sites of nature and heritage conservation, or protected species or habitats within the relevant screening distances.

3.3.3 Sensitive receptors within 1km of the site have been identified within Table 2 and are shown in Figure 4.

Table 2 – Sensitive Receptors

No.	Receptor	Category	Distance (m)	Direction from site
1	Cormac Solutions Depot	Commercial/Industrial	15	East
2	Cornwall Business Park West	Commercial/Industrial	25	South West
3	Cornwall Business Park	Commercial/Industrial	315	South West
4	Commercial units in Wheal Rose	Commercial/Industrial	175	West
5	Radnor Industrial Park	Commercial/Industrial	740	South West
6	Roddas's Cornish Clotted Cream Creamery	Commercial/Industrial	600	South West
7	Businesses at the old saw mills	Commercial	530	South West
8	Logan Electronics	Commercial	85	South
9	The Fuel Depot	Commercial	100	North West
10	Conway Bailey Transport	Commercial	340	North West
11	Residential property off Hallenbeagle Bridge Road	Residential	25	North
12	Caravan Park off Sawmills Lane	Residential	75	North East

13	Hallenbeagle Farm	Residential/Agricultural	140	South East
14	Residential properties off Sawmills Lane	Residential	180	South West
15	Residential properties east of Sawmills Lane	Residential	325	South East
16	Residential properties west of Sawmills Lane	Residential	485	South West
17	Residential properties in Scorrier	Residential	525	South West
18	Killifreth Farm	Residential/Agricultural	760	South East
19	Kirbartley Farm	Residential/Agricultural	400	South East
20	Pitslewren Farm	Residential/Agricultural	900	South East
21	Primrose Farm	Residential/Agricultural	600	East
22	Part Pitslewren Farm	Residential	845	South East
23	Residential properties in Wheal Rose	Residential	600	South West
24	Boscawen Farm	Residential/Agricultural	540	North East
25	Glencoe Farm	Residential/Agricultural	540	North West
26	Residential properties south of Blackwater	Residential	665	North West

27	Green Acres Farm	Residential/Agricultural	780	North
28	Boscawen Cottage	Residential	675	North East
29	Fays Touring Park	Recreational	660	South East
30	Blackwater Bypass (A30)	Public Highway	100	West
31	Railway Line	Railway Infrastructure	15	West
32	Central Cornwall Allotments	Allotments	975	East
33	Deciduous Woodland	Priority Habitat	370	East
34	Deciduous Woodland	Priority Habitat	350	South West
35	Deciduous Woodland	Priority Habitat	765	East
36	Deciduous Woodland	Priority Habitat	800	South East
37	Deciduous Woodland	Priority Habitat	485	South East
38	Deciduous Woodland	Priority Habitat	490	South East
39	Deciduous Woodland	Priority Habitat	551	South East
40	Deciduous Woodland (Unity Wood)	Priority Habitat	870	South East

41	Deciduous Woodland	Priority Habitat	525	South West
42	Deciduous Woodland	Priority Habitat	600	South West
43	Deciduous Woodland	Priority Habitat	605	South West
44	Deciduous Woodland	Priority Habitat	670	South West
45	Deciduous Woodland	Priority Habitat	720	South East
46	Groundwater (Secondary A)	Groundwater	-	Beneath Site

4 ROLES AND RESPONSIBILITIES

4.1 Site Management

4.1.1 The implementation and dissemination of this OMP will be the responsibility of the Senior Site Manager, supported by other staff. The Senior Site Manager can delegate certain tasks as required, although ultimate responsibility will remain with them.

4.1.2 A nominated deputy will be appointed for all times when the Site Manager is not on site. In such circumstances, it will be the nominated deputy's responsibility to ensure that the requirements of the OMP are adhered to.

4.2 Staff Training

4.2.1 Staff training will be a key aspect of ensuring that odour can be controlled through effective management during daily operations. All site operatives will therefore be trained via toolbox talks to deal with odour management issues. Annual refresher toolbox talks will ensure that the requirements of the OMP are reinforced. Toolbox talks will be delivered by the Senior Site Manager who has received appropriate training.

4.3 Maintenance

4.3.1 SUEZ's Emergency Preparedness and Response procedures provide a clear structure of responsibility which allows operational staff to call in specialist contractors to deal with emergencies and unplanned events which may lead to an odour impact. For occasions when the manager is off site then the nominated deputy will be authorised to take appropriate action.

4.3.2 A list of approved repair contractors will be maintained on the company's intranet and all staff with delegated responsibility should be aware of this list. In line with SUEZ's Policies and Procedures, if a part of the site infrastructure fails and cannot be fixed within 24 hours then a Corrective Action Request (CAR) will be raised on SUEZ's COMPAS system.

4.3.3 If maintenance is required on site to prevent odour, then the EA will be informed. Repairs will be initiated and completed as soon as possible. SUEZ's IMS checklist include checks on site infrastructure, which will allow preventative maintenance to be carried out.

4.4 Sub-Contractors

4.4.1 All sub-contractors working at, or delivering waste to the site, will be subject to the requirements of the OMP. It is the site manager's responsibility to inform sub-contractors of their responsibilities on site. Failure to comply with odour control measures will result in a Notice of Infringement being issued to the operative and their employer. Further failures to comply may result in that person being banned indefinitely from all SUEZ sites.

5 ODOUR MANAGEMENT AND CONTROL

5.1 Waste Enquiries

5.1.1 Prior to setting up any new contract, the agreed procedures will determine the acceptability of the waste based on the information supplied by the customer. The customer should complete a Waste Enquiry Form and return it to the Site Administrator.

5.1.2 Before the waste arrives at site, a copy of the completed Waste Enquiry Form will be made available to the site so that the Site Manager is aware of and can make provision for any special handling requirements (including odour) as detailed in the form.

5.1.3 A contract request form will be completed by the Sales Co-ordinator and forwarded to the relevant Site Administrator so that a contract can be set up before the waste arrives on site. This ensures the weighing exercise will be very quick to reduce the period of time incoming vehicles spend on site before depositing of waste.

5.1.4 The continued acceptability of all waste contracts will be reviewed annually, or in line with changes to legislation.

5.1.5 As the waste received at the site is via a long term contract and similar to other contracts within SUEZ, a high level of operator experience is shared in handling the feedstock.

5.2 Waste Acceptance

5.2.1 The site operators will ensure that capacity is available on-site before accepting waste. In particular, if the waste storage area is full, all inbound loads of waste must be diverted until the quantity of waste on site has been reduced. If loads are turned away, then this will be recorded in the site diary.

5.2.2 Only waste types detailed within the environmental permit will be accepted at the site.

5.2.3 Upon arrival, all documentation accompanying the load shall be checked at the weighbridge, and shall include, but not be limited to the Carriers Certificate of Registration and Duty of Care Waste Transfer Note.

5.2.4 Where practicable, the Weighbridge Clerk will complete a visual inspection of each load. The main inspection will be in the reception area. Site staff will visually inspect the waste, as it is unloaded from the vehicles and complete the Waste Acceptance Form.

5.2.5 Wastes that are believed to cause an odour problem will not be accepted at the site. Should the situation occur where a load with wastes that could cause an odour problem is delivered to site, the waste will be immediately placed in an area within the main building and will be prioritised for removal.

removed by the end of the working day. Recording of such information will allow the site to identify any sources of waste which persistently do not meet acceptance requirements enabling remedial action to be taken.

5.3 Waste Storage and Building Enclosure

5.3.1 The primary control of odour on site is that all potentially odourous wastes (as detailed in Table 1) will be discharged and stored within the main building that is equipped with fast acting roller shutter doors. In addition, an odour suppression system will be utilised in the transfer station area.

5.3.2 The majority of contracted wastes received at site will be a maximum of 2 weeks old arrival at site as the waste is collected on a fortnightly basis (this will only be influenced by the frequency of which a resident places their waste kerbside for collection). The only exception to this is food waste which is collected on a weekly basis and therefore will be a maximum of 1 week old.

5.3.3 The majority of the potentially odorous wastes on site will be stored for a maximum of 48 hours (72 hours during bank holiday and over weekends). The maximum storage time for street sweepings is 2 weeks due to the small quantity received at any one time. Offensive waste will be stored for a maximum of 48 hours (72 hours during bank holiday and over weekends) and clinical waste for a maximum of 1 week. The short turnaround time of potentially odorous wastes stored on site will minimise the likelihood of odour to develop.

5.3.4 The monitoring of incoming waste will be recorded as vehicles weigh on and off at the weighbridge. This data will be used to track all inputs and outputs of waste to ensure that the first in first out policy is adhered to and therefore ensure the turnaround period of potentially odorous waste is met. The data will also be used to monitor waste volumes on site and ensure that the amount of potentially odorous waste that is accepted at the site does not exceed the maximum storage limits.

5.3.5 Visual inspections of the waste storage areas will also be undertaken by the Site Manager to ensure that the volume of waste is not exceeded.

5.4 Waste Handling

5.4.1 Material will be delivered and removed from the site as described in Section 2.3 above.

5.4.2 Waste material will be moved in a regular and consistent manner and the site will operate a first in and first out policy on all waste streams to ensure that waste is removed from site as quickly as possible to prevent further degradation and minimise potential generation of odour.

5.5 Housekeeping

5.5.1 The site will be subjected to a good housekeeping regime which assists with the aim of proactive management and associated environmental compliance. Daily inspections will be undertaken at the site via the Daily/Weekly Checklist (Appendix A) or the Vision App. The checklist will be completed by the Site Manager or designated staff and signed off at least weekly by the Technical Competent Manager (TCM) for the site.

5.5.2 As described in more details in Section 5.3 all potentially odorous waste will be unloaded on the floor of the storage bays or stored in wheelie bins. Any possible spillage will be clean at the earliest opportunity. This will reduce the potential for odour. This will contribute to maintain a clean and organised site. Regular cleaning will be undertaken in the waste storage areas, including floors and bays to ensure the removal of any residues or debris.

5.5.3 In addition, any equipment on site that has been in contact with potential Odorous materials will be cleaned as and when deemed necessary.

5.5.4 Potentially odorous waste are stored within impermeable surface bays. The Transfer Station building benefits with a fully sealed foul drainage system.

5.5.5 In addition to operating a first in and first out policy the waste storage areas will be regularly emptied to allow it to be cleaned thoroughly.

5.6 Odour Checks

5.6.1 Regular odour checks are carried out to identify any potential odours as detailed in Section 6.2 below. Should any odour be identified, then contingency action shall be followed.

6 ASSESSMENT, REPORTING AND CONTINGENCIES

6.1 Overview

6.1.1 Prevention is viewed as the most effective means of controlling odour before an impact occurs. The Source → Pathway → Receptor model allows for the identification of the critical control points where odour can arise, how it can travel to a receptor and the likely impact.

6.1.2 It is intended that the odour management system will mitigate any potential odour impacts of the activity on the identified receptors. Should complaints be received, procedures will be in place to effectively deal with the issue in a sensitive, efficient and auditable manner.

6.1.3 The controls for each source term are detailed in previous sections of this report. The management of those controls will be based on the on-going monitoring regime at site. The monitoring regime can work as an early warning system to potential problems (e.g. meteorological monitoring) or a diagnostic tool to establish the cause of an odour event (e.g. perimeter monitoring).

6.2 Assessment

Odour checks

6.2.1 The Site Manager will be responsible for ensuring that daily odour inspections are made of the site and its perimeter boundary in order to identify any sources of odour and to establish whether any odours are discernible. Odour checks are recorded on the daily and weekly IMS Checklist or Vision App detailed within the Operations Management Plan and included in Appendix A.

6.2.2 However, the site management do not solely rely on the odour checks and odour is continually assessed by all staff present on site and any odours identified outside the regular inspections are reported to site management for investigation.

6.2.3 Generally, the site supervisor will carry out the daily odour checks. Any odours identified must be clearly marked on the Checklist or Vision App.

6.2.4 Should a distinct odour be identified during a routine odour check then an investigation on the source of the odour will be undertaken.

6.2.5 Upon identification of an incident or failure of a control measure, then in consultation with the EIR Manager the odour check frequency might be increased to twice daily if necessary.

6.2.6 Should an odour be attributed to the site and the odour sources cannot be resolved within a timely manner then an odour inspection shall be undertaken at key sensitive receptors and recorded on the external odour assessment survey which will clearly indicate whether or not odour was detected.

6.2.7 Should an odour attributed to the site be recorded external to the site as detailed above then an investigation shall be carried out and recorded on the odour assessment form included in Appendix B.

6.2.8 The Site Manager will be informed immediately of any findings of odour attributed to the site and will authorise remedial measures to be taken. Remedial actions may include but be not limited to:

- Checking storage areas to identify the source of the odour to a particular waste.
- Removal of the odorous waste at the earliest opportunity and within 24 hours.
- Cleaning of storage area.

  Use of an odour suppression system for the dispersal of odour-neutralising agents if required.

Odour Assessment

6.2.9 In the event of an odour issue, due to the potential for desensitisation to odours, odour assessment will be carried out by site personnel who do not work closely with handling waste e.g. office or weighbridge staff. These personnel will be the most suitable to detect any fugitive odour outside the site. Routine odour assessment shall be undertaken, where possible, during hours of waste acceptance and prior to those assessing the odour having entered operational areas where they may be likely to be exposed to odours.

6.2.10 Those undertaking odour assessment should try to avoid where possible strong food or drinks, including coffee, for at least half an hour beforehand and strong scented toiletries and deodorisers in any vehicle used during the assessment. Where possible the use of perfume sprays, cleaning products etc are avoided within the offices to prevent exposure.

6.2.11 Should staff have been exposed to odours within the facility or any scented products, food or drinks prior to undertaking odour assessment then they may request that the assessment is undertaken by someone else. If this is not possible then the assessor may leave site for a period of time (approximately 15 mins or more) or complete the assessment but ensure that a follow up assessment is carried out after half an hour.

6.2.12 Routine odour assessment should, where possible, be undertaken by staff who have undergone odour acuity assessment to ensure a suitable detection threshold for odours.

6.2.13 Odour assessment is carried out using sniff testing to check ambient air on or off site.

6.2.14 Off-site olfactory assessment will be carried out with reference to the H4 Odour Management Guidance, with an odour assessment form being completed. All site personnel will be responsible for reporting any odour problems immediately to the site manager or the next level of management if the manager is not available.

6.2.15 The form used for odour inspections and assessments is included within Appendix B.

6.2.16 All odour assessments are undertaken using the intensity scale detailed below which is in line with the H4 Odour Management Guidance. This ensures consistency and enables odour assessments taken by Site Management to be compared with odour assessments taken in conjunction with or independently by the Environment Agency.

0. None
1. Very Faint
2. Faint
3. Distinct
4. Strong
5. Very Strong
6. Extremely Strong

6.3 Complaints Management and Reporting

Investigation and Records

6.3.1 All complaints and queries received at the facility or via the regulatory bodies including the Environment Agency and Local Authority will be logged in accordance with the integrated management system as soon as practicably possible. Where possible, as much information and detail about the complaint will be recorded, whether this is from the relevant authority or complaint direct to site. All complaints logged will be subject to investigation and complainants responded to as necessary following completion of the investigation. All responses will be through trained and experienced staff.

6.3.2 Complaints management will be undertaken in line with IMS – Amenity Complaints. The first stage of complaints investigations is to complete a basic screening exercise to determine if the site is the likely cause and if further, more detailed investigations are required. Once determined that further investigations are needed an off site and on site odour investigations are carried out using the Amenity Complaint Investigation Form included within Appendix C.

6.3.3 Complaints investigations are carried out by site management that are not regularly exposed to the odours and therefore are able to assess the level of odour objectively.

6.3.4 Should a complaint be received out of operational hours of a current / ongoing issue then site management shall try to attend site as soon as possible to carry out an investigation, dependent upon availability.

6.3.5 Where necessary, the Environment Agency shall be informed of the investigation findings so they can relay this back to the complainant.

6.3.6 SUEZ will ensure that the complainant has relevant contact details for the site (i.e. the Site Manager). SUEZ will be in regular contact with the complainant and / or the EA where necessary, whilst any odour issue is being investigated or remediated.

6.3.7 An evaluation of the effectiveness of the techniques used will be carried out on completion of any remedial measures or if the complaints persist. Records of the above will be retained by site for future reference.

Non-Conformances and Complaints

6.3.8 The investigation will determine the source of the complaint and then the cause of the odour.

6.3.9 If an odour can be directly related to the site, corrective actions will be identified and programmed for remediation. Actions taken in response to any odour complaint will be recorded on the Amenity Complaint Investigation form.

6.3.10 Corrective action procedures are documented in IMS – Non-conformance, Corrective and Preventive Actions. A list of all policies and procedures is included in the Operations Management Plan, which forms part of the Environmental Permit.

6.3.11 If remediation cannot be completed within 24 hours then the non-conformance and remedial actions shall be raised on the SUEZ Compliance and Audit System (COMPAS).

6.3.12 SUEZ operates an open communication policy with residents and businesses surrounding its sites and will engage with them if deemed necessary.

6.3.13 If necessary following received complaints, SUEZ will engage and communicate with its neighbours to improve understanding of possible odour issues. This will include detailing the efforts being undertaken to control odour; and importantly the actions being taken in response to their complaints.

6.3.14 Should any problems associated with odour be identified (either by SUEZ or through external sources), SUEZ would engage with those surrounding the site to ensure that they are kept up to date and have means of communicating with SUEZ through an appropriate communications strategy established by the communications team and in agreement with the client. This may include letter drops, visits to the site, open community meetings, social media updates and if appropriate and in agreement with the local residents and political representatives, and if necessary, the establishment of a Community Liaison Group (CLG).

Odour Complaints and Management Review

6.3.15 All complaints will be investigated by the Site Management including but not limited to a review of the number of complaints, weather conditions, investigations and remediation works. If required, the

Operations Management Plan (Document reference 1.2) and OMP shall be updated to reflect any changes made to the management procedures on site following the review.

6.3.16 Site Management and the EIR Manager will review all procedures for the facility as necessary against other SUEZ operations and management procedures as well as industry practice, guidance and legislation to ensure continued best practice is carried out at the facility. Any amendments to practices on site will be reflected in updates of the Operations Management Plan and the OMP.

6.3.17 All complaints received by the site are recorded on Richmond. All odour complaints are reported to the EIR Manager and communicated to relevant parties within SUEZ as part of the EIR Department's monthly review.

6.4 Means of Contact

6.4.1 The site will be readily contactable to outside organisations and to members of the public. The site signage board (placed in a readily visible location) contains the necessary contact details for both the site operations and Environment Agency.

6.5 Contingency and Emergency Plans

6.5.1 In the event that odour is proven to be from the site and found to be causing a problem, as determined by the investigation of off-site complaints or during routine on-site monitoring, action will be taken to determine the source.

6.6 Abnormal Events

6.6.1 The OMP assumes that the site will be running under expected operational conditions. There are however a number of circumstances which could result in an odorous emission from the site if not appropriately considered in advance.

Temperature Inversions

6.6.2 The conditions that can facilitate a temperature inversion (warm odorous air trapped beneath a layer of cold air under still conditions) can be predicted by simple regard to local and regional weather forecasts. If such conditions look possible olfactory monitoring will focus on the down-flow boundaries of the site to monitor for the early signs of low-level odour movement.

Storm Conditions

6.6.3 Severe storms may result in disruption to the removal of materials from site. However severe storm conditions are unlikely to be prolonged. Therefore, it is considered unlikely that this will cause a major odour issue on site as potentially odorous waste will unlikely be stored for more than 48 hours (72 hours during bank holiday).

Hot Conditions

6.6.4 There is a greater potential to generate odour during warm weather and therefore an increase in ambient air temperature may result in increased odour. During prolonged periods of hot weather olfactory monitoring frequency will be increased and any wastes identified as generating an odour will be prioritised for removal from site.

Implementation of the Contingency Plan and/or Emergency Plan

6.6.5 Wastes that are believed to cause an odour problem will not be accepted at the site. Should the situation occur where a load with wastes that could cause an odour problem is delivered to site, the waste will be immediately placed in a designated bay/s and removed by the end of the working day if received prior to 12noon, or, if received after 12 noon, removed by 12 noon the following morning (excluding Sunday where it will be removed the next permitted day, Monday). A load rejection form will be completed, and a copy of this form will be kept on site.

6.6.6 Should site maintenance be required that would significantly disrupt normal operations and could have the potential to cause an environmental impact (for example during emergency situations), staff will initially inform the site manager who will in turn inform the Environment Agency. Site staff will implement measures to store or divert waste as required.

6.6.7 The contingency plan in place at the site is discussed in more details in Table 3 below.

Table 3 - Contingency Plan

ISSUE	POTENTIAL IMPACT ON SITE OPERATIONS	PERIOD	MITIGATION PLAN
Storage capacity full. Site not available as a storage place	This could potentially mean that the site does not have capacity to accept waste for deliveries	1 day	Direct waste to alternative storage area.
		Up to 72 hours	As above Risk assess odour generation and impact by increasing Odour Assessment
Storage capacity full due to plant	This could potentially mean that the site does not have capacity to accept waste for	1 day	Address mechanical failure and/or issues Plant can be hired at short notice from preferred contractor or brought from one of SUEZ's other facilities.

ISSUE	POTENTIAL IMPACT ON SITE OPERATIONS	PERIOD	MITIGATION PLAN
mechanical failure	deliveries and to transfer waste off site	Up to 48 hours	As above Risk assess odour generation and impact by increasing Odour Assessment
		Up to 72 hours	Direct deliver to alternative storage area Address mechanical failure and/or issues Plant can be hired at short notice from preferred contractor or brought from one of SUEZ's other facilities. Identify alternative long-term storage area
Waste removal halted storm conditions / power plant shut down.	Difficulties in removing waste could lead to waste accumulating on site.	1 day	Receive waste and store up to the permit capacity limit and for no-longer than the maximum duration.
		Up to 72 hours	Risk assess odour generation and impact by increasing Odour Assessment Implement medium term solution i.e. transfer to alternative site.

Experience with Contingency/Emergency Situations

6.6.8 SUEZ is experienced in developing contingency plans for other long-term contracts which have worked effectively on previous occasions.

6.6.9 SUEZ has a policy of continuous review of emergency and contingency procedures and this has allowed experience from these incidents to be used to improve procedures across the operations.

6.6.10 SUEZ experience in operating a significant number of waste facilities, together with managing complex long-term contracts offering similar services, means that SUEZ is able to offer the benefit of experience in and knowledge of logistical planning to ensure that service continues effectively with minimal disruption.

Review and Update of Contingency and Emergency Plans

6.6.11 The Contingency Plan and Emergency Plan will be reviewed following any incident where they have had to be followed. They will be updated as necessary incorporating the outcome of any lessons learned.

Appendices

Appendix A – Indicative IMS Daily/Weekly Site Inspection Checklist

DAILY INSPECTION (GENERAL)

Facility Name:

Week Commencing:

Recycling and recovery UK

Performance Standard	Hours to Rectify	Inspected Item	Mon	Tue	Wed	Thur	Fri	Sat	Sun	TCM	CAR Ref.
		Inspected By (Initial):									
A1	1	Have there been any Health and Safety issues on site?									
A3	3	Have all open top vehicles leaving the site been netted or sheeted before leaving the loading area?									
A5	72	Have all containers and Suez vehicles which carry Contract Waste got the correct logos in a clean and visible condition?									
A6	3	Has the site closed? If so, was the Contingency Plan followed?									
A9	None	**RTS and MRF only**: Have there been any occaisions when the volume of trade waste on site has prevented Contract Waste being accepted or stored?									
A10/D12	24	Is there enough capacity in all containers, cages and storage bays for Contract Waste until your next collection?									
A10/D12	24	At any point in the last 24 hours has there been insufficient capacity for Contract Waste?									
A11	24	Are all permanent staff wearing uniform with a Suez logo?									
B1/B2/B3/B5/B6/D15	1	Did the Weighbrige Operator complete the Weighbridge Inspection Checklist at the end of the last operational day? If so, were all non-conformances reported to helpdesk?									
C3/C4	3	Have there been any accidents involving a member of the public or any accident classed as 'RIDDOR' of which the helpdesk have not been informed?									
D3	24	Are there sufficient working lights on site to provide the Service? Are those lights fully operable with no flickering and in good condition?									
N/A	N/A	Are all handrails on bays/steps undamaged? Are all containers in good condition?									
D4	24	Does the Site Diary contain the printed name of the person responsible for the site today?									
D6	1	Are all perimeter fences and gates in good condition and is the site secure?									
D8	24	Are all signs in place and in a clean and legible condition? Are all signs presented in accordance with the Traffic and Signage Plan?									
D9	72	Is the Site Diary in place, completed and filled in correctly?									
D11	1	Has there been any failure to follow the HWRC Contract Waste Checking Procedure?									
D13 (1)	1	Have any spillages of Contract Waste presenting a health or safety hazard been cleared promptly?									
D13 (2)	3	Have any spillages of Contract Waste been cleared in accordance with the SOP?									
D14	3	Are fridges and freezers stored in compliance with the SOP and is there adequate capacity until the next collection?									
D16	72	Has there been any unauthorised access to the site, if so, have the consequence been dealt with in accordance with the SOP?									
D17	72	Have all required checks and maintenance for plant and equipment on site been completed?									
D18	24	Are all welfare and toilet facilities available and maintained to the standards required by the SOP?									
D19	24	Has Contract Waste waste been removed or treated in accordance with the Environmental Permit for the site?									
D21	72	Is the facility reasonably free of pests and vermin?									
D22	24	Has any fly tipping or litter within the site or 5m of its boundary been removed?									
D23	24	Has any graffiti or unauthorised notice been removed and the area cleaned/repaired?									
D24	24	Have all Authorised Users been made aware of site rules?									
D25	24	Is all Household Hazardous Waste stored safely and securely and in line with the Environmental Permit?									
D26	3	Are there sufficient staff on site?									
E1	None	Has their been any breach of policies and procedures or Good Industry Practice of which you are aware?									

N/A	N/A	Has there been any attempted private trade entry?									
N/A	N/A	Has the site infrastructure (buildings, fencing, yard, tipping floor walls etc) been inspected and found to be satisfactory?									
N/A	N/A	Are all interceptors in good working condition, free from blockage and with adequate capacity until the next scheduled maitenance?									
N/A	N/A	Has there been any breach of waste acceptance procedures, waste transfer or duty of care procedures?									
N/A	N/A	Are all fuel tanks or other bunded storage vessels in good working order, free of visible leakage and damage?									
N/A	N/A	Is the spill kit available and complete?									
N/A	N/A	Is all emergency and fire fighting equipment available, complete and operable?									
N/A	N/A	**RTS and Landfill only**: Is the odour supression system operating satisfactorily?									
N/A	N/A	Are all systems and procedures for controlling dust, noise and odour in place, operable and complied with?									
N/A	N/A	Are there any issues with fixed or freestanding structures?									

Key: ✓ **Satisfactory; X = Action required; NI = Not Inspected; NA = Not Applicable**

Note: Inspection should be completed daily on days when the facility is operational
If non-compliance is minor and resolved the same day, comments to be recorded on this form, in the Site Diary and Helpdesk.
Otherwise a Corrective Action Request (CAR) can be raised with CAR reference recorded in right hand column.

TCM Attendance (hours):

TCM Signature:

Comments:

Monday	
Tuesday	
Wednesday	
Thursday	
Friday	
Saturday	
Sunday	
Other	

Appendix B – Odour Inspection Form

Odour Investigation - Detailed Assesment Form

To be completed after odour is detected on external assessment form, or following a complaint

ODOUR ASSESSMENT REPORT CAR Ref

Installation Location

Date

Weather

Wind (strength & direction)

Temperature

Bar Pressure (mbar) if known

Ground Condition

General Air Stability (if known)

General Air Quality

Cloud cover

Time Start

Time Finish

Plan attached showing location and extent of odour **Yes / No** (delete as appropriate)

Complaint Received **Yes / No**

Date/Time complaint received

Location of Complaint Area

Number of complaints (related to the same source)

Grid reference (where location is not a property)

Time odour noticed and duration

Test Location	Intensity (0-6)	Extent (0-6)	Severity (0-6)	Offensiveness (0-6)	Sources within facility	External sources

0 - None, 1 -Very Faint, 2 - Faint, 3 - Distinct, 4 - Strong, 5 - Very Strong, 6 - Extremely Strong

Additional Comments

Signed

Persons Contacted Regarding Process

Action Required

Appendix C - Amenity Complaint Investigation Form

THIS FORM MUST BE COMPLETED FOR ALL AMENITY COMPLAINTS THAT REQUIRE AN INVESTIGATION IN LINE WITH IMS 3.36B. IF MORE THAN ONE OF THE SAME TYPE OF COMPLAINT IS RECEIVED IN ANY ONE DAY, THEN ONE INVESTIGATION FORM CAN BE USED TO COVER ALL COMPLAINTS OF THE SAME NATURE.

1. Investigating Manager/Supervisor

A) Name		**B) Position**	
C) Location*	**Note: this is the SUEZ location the complaint relates to*		

2. Complaint Type/Location

This section looks at the type of complaint that has been received, as well as the location it was made from.

A) <u>When</u> did the complaint and investigation occur? **Note: the issue may have been experienced by the complainant before they made the complaint*	**Alleged issue:** Date:_____ Time:_____	**Complaint made:** Date:_____ Time:_____	**Investigation:** Date:_____ From (time):_____ To (time):_____
	Have any other related complaints been received within the last 7 days? Yes ☐ No ☐ If yes, provide basic detail:		
B) <u>What</u> type of amenity complaint has been made? **Note: tick all that relate*	Odour ☐ Dust ☐ Noise ☐ Litter ☐	Mud or Debris ☐ Pests ☐ Light ☐ Other ☐ If other, please detail:_____	
	Basic description of amenity issue: _____ (e.g. type of odour)		
C) <u>Where</u> was the complaint made from? **Note: this is the complainant's location. The exact location may not be provided if the complaint has been received via the environmental regulator or local authority*	Full address (if known): Postcode (if known): If the above are unknown, then provide the approximate area of the complaint:		

3. Weather Conditions

Weather conditions at the time of the alleged issue and during the investigation are important. Some weather conditions can cause amenity issues to be worse, so it is important to provide details where they are known.

A) <u>What</u> were the weather conditions like at the time the complainant experienced the issue? **Note: you may only be able to accurately identify this if you have a weather station on site*	General Description: Wind (speed and direction):_____ Temperature (ºC):_____ Raining? Yes ☐ No ☐ Ground conditions: Wet ☐ Damp ☐ Dry ☐
B) <u>What</u> were the weather conditions like at the time of the investigation? **Note: you can use weather data from a weather station, the Met Office and your own observations*	General Description: Wind (speed and direction):_____ Temperature (ºC):_____ Raining? Yes ☐ No ☐ Ground conditions: Wet ☐ Damp ☐ Dry ☐

4. Off-Site Investigation

It is important to attend the complainant's location to assess whether an impact is occurring. Guidance on what to look for is available in IMS 3.36b.

A) What is the amenity impact at the complainant's location? **Note: identify whether there is any impact being caused and indicate the severity*	Amenity impact? Yes ☐ No ☐ If yes, detail the severity. For odour, refer to the odour intensity and extent details in Appendix A. For other amenity issues, provide a basic written description:
B) Note any other sensitive receptors in the complainant's location	**Note: refer to housing, parks, pubs etc*
C) Are there any other actual or potential sources of amenity impact in the local area?	

*Note: if another source is identified causing an amenity impact, then ensure this is detailed	

5. On-Site Investigation

Following the off-site investigation, it is essential to assess what was occurring on site. If a complaint is received or investigated after the alleged issue, then it may be difficult. If this is the case, then provide an overview of the operations that were occurring at the time of the alleged issue. Guidance on what to look for is available in IMS 3.36b.

A) Site activities *Note: CCTV footage may be useful in determining site conditions at the time of the alleged issue. If an amenity issue has not been traced back to site, then it is still useful to provide detail of site conditions at the time.	If an amenity impact was noted in section 4A, then state whether this has been traced back to site operations. Focus on the following areas: Waste inputs/outputs Waste storage Waste treatment processes Condition of infrastructure
B) Non-conformance	If the amenity impact can be traced back to site, state whether this was as a result of a non-conformance: Yes ☐ No ☐ If yes, provide detail: *Note: you may need to refer to the Permit and site-specific management plans*
C) Corrective action *Note: provide COMPAS CAR reference number if the required action has been raised as a CAR*	If a non-conformance has been identified, then state what has been done to remediate this:

6. Supporting Information & Evidence

Supporting information can be useful in building a picture of the incident.

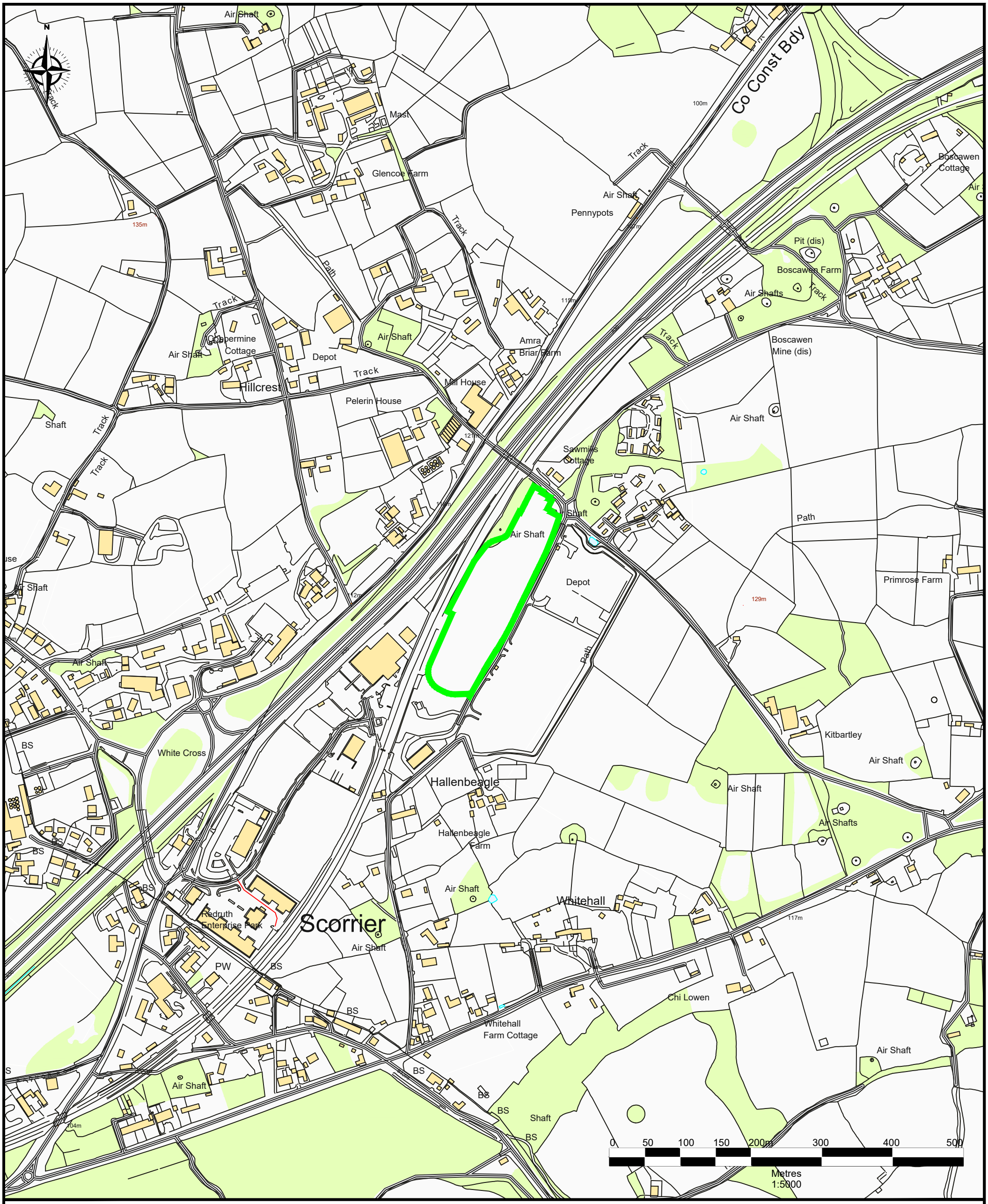
A) Attach any photos or videos	

11. Appendix A

Odour Intensity	Odour Extent (assuming odour is detectable)
0: No detectable odour	1: Local and impersistent (only detected during brief periods (wind drops/blows
1: Very Faint Odour (barely detectable, need to stand still and inhale facing into the wind)	2: Impersistent as above, but detected away from site boundary
2: Faint Odour (odour easily detected while walking and breathing normally, possibly offensive)	3: Persistent, but fairly localised
3: Distinct Odour	4: Persistent and pervasive up to 50 m from site boundary
4: Strong Odour	5: Persistent and widespread (odour detected >50 m from site boundary)
5: Very Strong Odour	
6: Extremely Strong Odour	

Figures

Figure 1 – Site Location Plan



Notes

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Hallenbeagle TS and MRF permit boundary

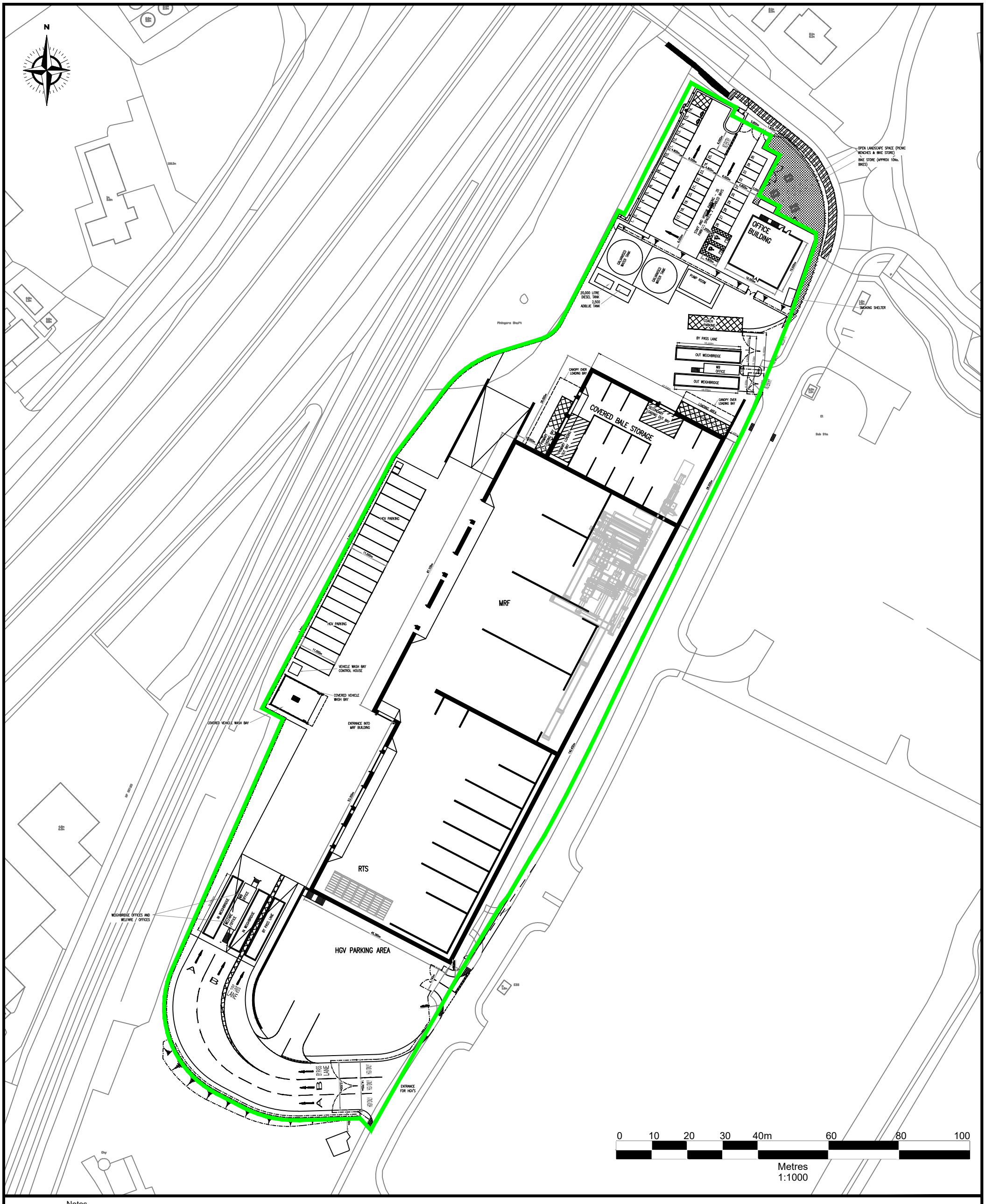
suez

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@sita.co.uk

Site	Hallenbeagle Transfer Station and Material Recycling Facility
Title	Site Location Plan
Scale	1:5000 @ A3
Date	November 2023
Drawing Ref	Hbg-LOC-1123-01
Drawn by	JA
Checked by	GGD

Rev	subject	date

Figure 2 – Site Permit Boundary



Notes

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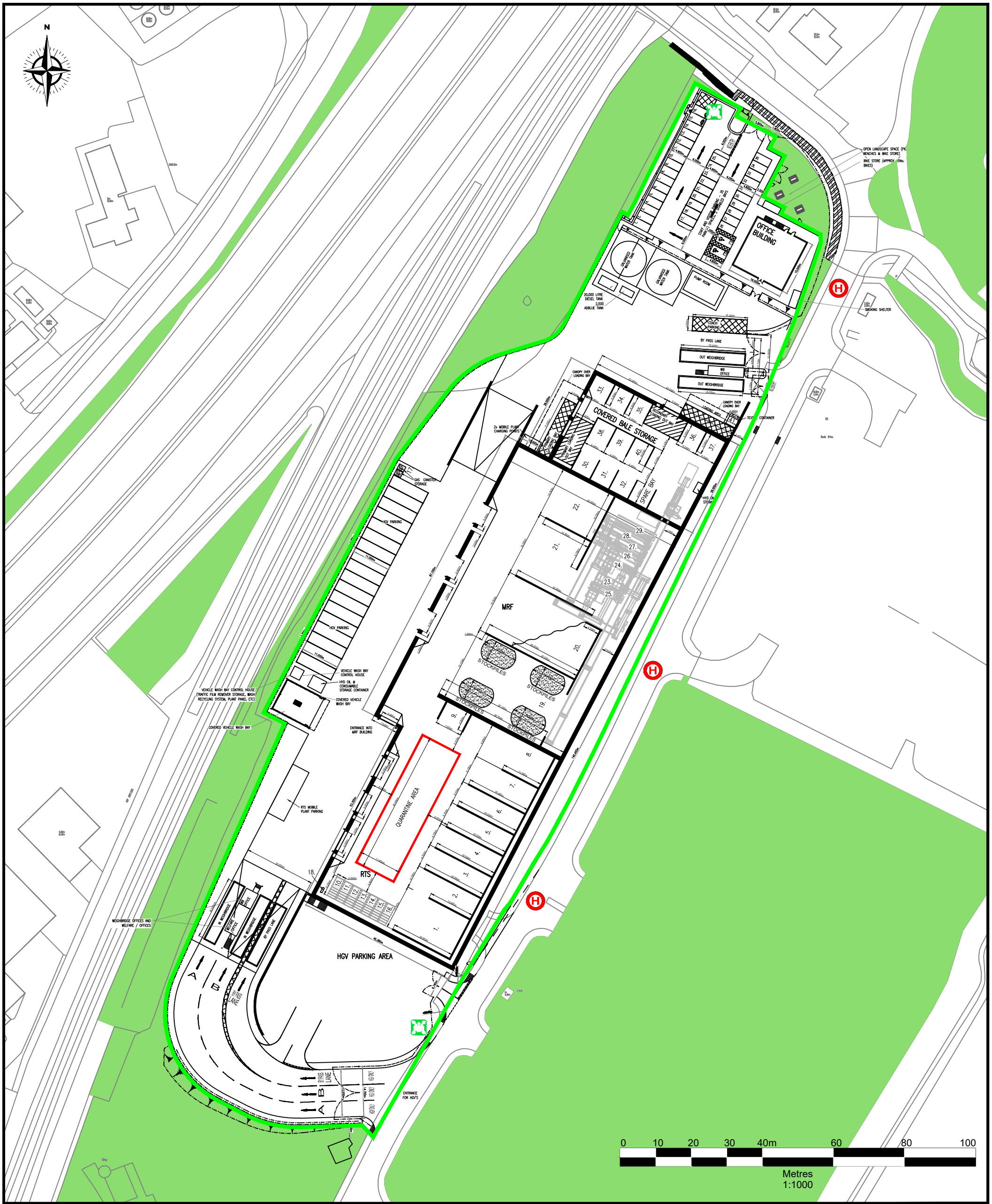
Hallenbeagle TS and MRF permit boundary

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bissel@sita.co.uk

Site	Hallenbeagle Transfer Station and Material Recycling Facility
Title	Permit Boundary Plan
Scale	1:1000 @ A3
Date	November 2023
Drawing Ref	Hbg-PER-1123-01
Drawn by	JA
Checked by	GGD

Rev	subject	date

Figure 3 – Indicative Proposed Site Layout Plan



Notes

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Hallenbeagle TS and MRF permit boundary

Assembly points

Quarantine area

Unmade Ground

Fire Hydrant

suez

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@sita.co.uk

Site: Hallenbeagle Transfer Station and Material Recycling Facility

Title: Indicative Site Layout Plan

Scale: 1:1000 @ A3

Date: November 2023

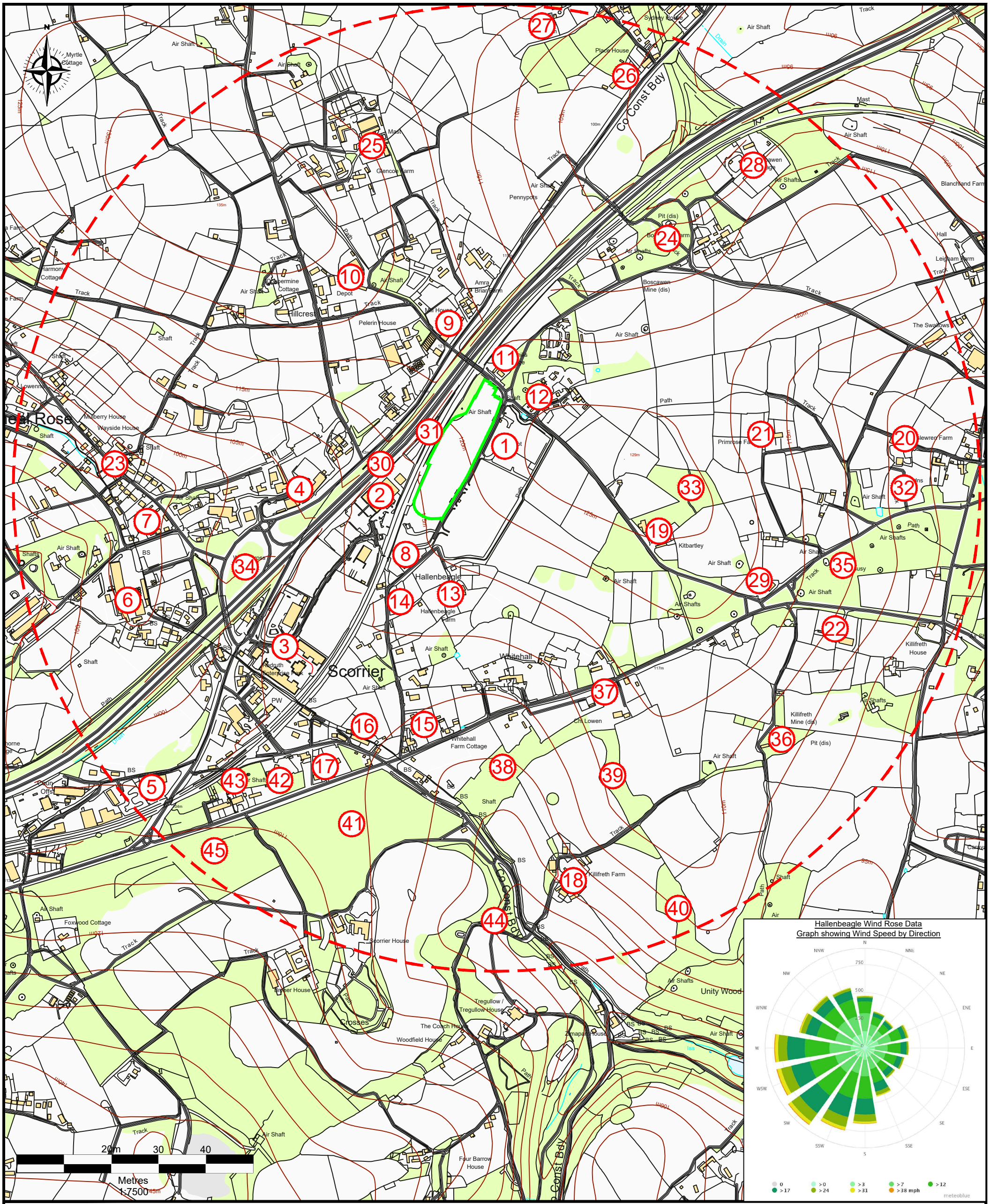
Drawing Ref: Hbg-LAY-1123-01

Drawn by: JA

Checked by: GGD

Rev	subject	date

Figure 4 – Site Receptor Plan



Notes

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Hallenbeagle TS and MRF permit boundary

1km Offset

① Receptors

Darwen Resource Recovey Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel:(01254)819700, Fax:(01254)819749, Email: richard.bisset@sita.co.uk

Site	Hallenbeagle Transfer Station and Material Recycling Facility
Title	Receptor Plan
Scale	1:7,500 @ A3
Date	November 2023
Drawing Ref	Hbg-REC-1123-01
Drawn by	JA
Checked by	GGD

Rev	subject	date