ENVIRONMENTAL MANAGEMENT SYSTEM

Odour Management Plan

Reference: EMS-OP-04

Version 1 Dated 14.3.2023

Weybeards Farm
Hill End Road
Harefield
Uxbridge
UB9 6LH

DOCUMENT CONTROL SHEET

Version Reference	Date	Reason for Change	Issued by
1	14.3.2023	Application for Environmental Permit	ARC

Contents

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1 INTRODUCTION

1.1 Purpose

The purpose of these procedures is to guide staff and contractors in the safe conduct of their duties in a manner which controls the environmental impacts of the company's operations, with specific reference to odour management.

With reference to Environment Agency guidance[1] "*you must prevent, or where that is not possible, minimise odour if you have a waste, mining waste or installation permit*." It requires an Odour Management Plan if "*your site causes odour pollution, or if you carry out any of the following activities:*

- *landfilling biodegradable waste*
- *household, commercial and industrial waste transfer station*
- *composting in open windrows*
- *composting in vessels*
- *mechanical biological treatment*
- *sewage sludge treatment*
- *clinical waste treatment*
- *animal carcass incineration*
- *pet cemetery*
- *mobile plant for landspreading, the treatment of land for land reclamation, restoration or improvement and landspreading of sewage sludge*
- *anaerobic digestion*
- *mobile plant for the treatment of waste soils and contaminated material, substances or products manufacture, use or recovery of compounds containing sulphur, ammonia, amines and amides, aromatic compounds, styrene, pyridine and esters*
- *abattoirs and renderers*
- *food production involving any form of cooking or heating and brewing*
- *refineries*
- *distilling or heating tar or bitumen*"

The site can meet the Standard Rules Permit SR2015 No6: 75kte household, commercial and industrial waste transfer station with treatment. The only exception to this, is the proximity to a Site of Special Scientific Interest (SSSI). The SSSI is Old Park Wood, it is designated for its differing woodland types. There are no other designations within 500m of the site.

Whilst the operation is listed as a household, commercial and industrial waste transfer station with treatment, the site will only receive skip waste from the operator's collection service. Skip waste is typically associated with refurbishment projects and construction work. The wastes being handled are not typically be odorous.

[1] https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#odour

The risk assessment has shown that the operations will not cause odour and will not cause harm or nuisance to receptors. An Odour Management Plan is considered unnecessary in this case but has been prepared to support an application to vary the Environmental Permit.

1.2 Roles and Responsibilities

The Technically Competent Manager has responsibility for ensuring these procedures are adhered to which includes communication with staff and contractors, and the provision of adequate training.

The Technically Competent Manager is responsible for updating and re-issuing these procedures as necessary and ensuring all staff are trained in new procedures.

1.3 The Operator

The operator has been involved with waste management for many years. The current permit specifically allows the receipt, storage and treatment of waste cooking oil, (EWC 200125 edible oil and fat). The permit allows the operator to manage up to 25,000 tonnes per annum. This operation had a higher risk of odour than the proposed variation. There were no complaints associated with the use due to the operator procedures and remoteness of the site.

This activity will be removed from the permit and the operations changed to allow the receipt, storage and treatment of waste collected from the skip collection service.

The current environmental permit was issued in November 2011 and permitted the receipt, storage and treatment of waste cooking oil. The operations continued without any significant compliance issues and no odour complaints.

1.4 Scope

These Operational Procedures cover:

- Operations involving non-hazardous waste
- Treatment of non-hazardous waste

The procedures relate to the permitted activities at Weybeards Farm, Hill End Road, Harefield, Uxbridge, UB9 6LH.

1.5 Management System

The Management System covers all aspects of operations and aims to effectively manage the impacts of the business on the environment. The key documents include:

a) Documents: Procedures to set out how to undertake operations and checking for any issues.
    - EMS-OP-01 Operational Procedures
    - EMS-OP-02 Noise Management Plan
    - EMS-OP-03 Dust Management Plan

- EMS-OP-04 Odour Management Plan
- EMS-FPP-01 Fire Prevention Plan

b) Forms on which to record information and provide evidence of the system functioning properly.

Cross referencing to specific aspects in the EMS has been made in this report.

All documents will be kept in the site office.

1.6 Site Location

The procedures relate to the permitted activities at Weybeards Farm, Hill End Road, Harefield, Uxbridge, UB9 6LH.

The site is in a rural setting, within the former agricultural buildings at Weybeards Farm.

The nearest residential properties are within the ownership of the operator and are lived in by family members. The nearest other residential property is Primrose Cottage.

Old Park Wood SSSI surrounds the site to the west and south. Beyond which, there are residential houses on Bellevue Terrace, which is some 320m south west of the site.

Maple Lodge Sewage Treatment Works located 570m north west of the site. This is a large Thames Water works.

2 Operations

2.1 Waste Deliveries to Site

At the time of booking, all customers will be notified about the waste acceptance procedures and will be provided a list of wastes that are not permitted at the site. The prohibitive list includes asbestos, fluorescent tubes, paint and aerosols, clinical and medical waste, oils, and hazardous waste. No food waste will be permitted (EWC 200108) and no edible oil and fat waste will be permitted (EWC 200125).

If a customer requires mattresses, tyres and fridge freezers to be collected, separate arrangements are made for these items to be collected separately and taken to an appropriate facility.

The customer will be informed that the following wastes will be permitted, paper, cardboard, garden waste, wood, plastic, metal, hardcore, rubble, bricks, tiles and oils. Any plasterboard must be bagged and placed on the top of the skip.

The operator will request details about the nature of the waste to be collected.

The site will predominantly accept mixed construction waste (EWC170904). Skip waste is a mixture of waste generated through construction and refurbishment projects. It can contain cardboard, light plastic, rigid plastic, wood, metal, textiles (carpets, curtains), furniture, bricks, concrete, soils and garden waste.

On rare occasions, a skip could contain single waste streams, for example wood, or garden waste, or furniture. Therefore, additional codes will be included to cover those scenarios.

At the point of collection, an initial visual inspection of the waste will be undertaken by the driver to check for conformance. This will ensure that only acceptable waste will be loaded on to the vehicle. Any of the prohibited items identified above will be removed at the customer's property.

Table 1 provides the list of wastes that will be typically handled at the site on a day to day basis.

If the operator decides to routinely accept other wastes listed in the future, this Odour Management Plan and associated documents will be amended.

2.2 On Site Waste Acceptance

The driver will arrive at the site and provide Waste Transfer Notes to the site office. The driver will then be directed to the building. The vehicle will be unsheeted once inside the building. The waste will be visually checked as it is unloaded to ensure that the waste is acceptable.

The driver will check the vehicle wheels before existing the building and will use the hose and brush if required.

Any incidents of non-conformance will be recorded in the Non-Permitted Waste Form EMS-FR-01 and corrective action taken.

2.3 Overview of Waste Processing

The site layout is shown on Drawing No HEP-WEF-LAY-01. The waste codes set out in Table 1

provide the main list of waste to be accepted and assigns a risk category for odour.

The waste processing activities will be straightforward sorting and separation.

Table 1 –Wastes Typically Accepted at the Site

EWC Code	Description	Comments	Risk of Odour
15 01 01	Paper and Cardboard	Not routinely accepted. Any such waste would be placed in the designated container for off-site transfer.	Low
15 01 02	Plastic packaging		Low-Medium
15 01 03	Wooden packaging		Low
15 01 04	Metallic packaging		Low-Medium
15 01 05	Composite packaging		Low-Medium
15 01 06	Mixed packaging		Low-Medium
15 01 07	Glass packaging		Low-Medium
15 01 09	Textile packaging		Low
16 01 03	End of Life Tyres		Low
17 01 01	Concrete	Not odorous	Negligible
17 01 02	Bricks		Negligible
17 01 03	Tiles and ceramics		Negligible
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06		Negligible
17 02 01	Wood	These wastes are not likely to be accepted as single waste streams. There may be occasions when a project will require a separate container for some wastes. These codes would be used for those scenarios.	Low
17 02 02	Glass		Low
17 02 03	Plastic		Low
17 04 01	Copper, bronze, brass		Negligible
17 04 02	Aluminium		
17 04 03	Lead		
17 04 04	Zinc		
17 04 05	Iron and Steel		
17 04 06	Tin		

17 04 07	Mixed metals		
17 04 11	Cables		
17 05 04	Soils and Stones	Waste would be typically transferred direct to a site that can process this waste. Unlikely to be received as a routine single source waste stream at the site.	Negligible
17 08 02	Gypsum based construction materials	Wherever possible, this waste will be segregated at source.	Low (waste will be segregated and stored in separate container)
17 09 04	Mixed construction and demolition wastes other than those mentioned in 170901, 170902 and 170903	This will be used for most of the waste arriving at the site. Skips containing a mixture of wood, metal, plastic (packaging, UPVC, rigid), glass and textiles (carpets, floor tiles).	Low
19 12 01	Paper and cardboard	Not routinely accepted. This provides some flexibility if it provides an efficient service for transferring waste.	Low-Medium
19 12 02	Ferrous metal		Low-Medium
19 12 03	Non ferrous metal		Low-Medium
19 12 04	Plastic and rubber		Low-Medium
19 12 05	Glass		Low-Medium
19 12 07	Wood		Low-Medium
19 12 08	Textiles		Low-Medium
19 12 09	Minerals		Low-Medium
19 12 10	Combustibles		High
20 01 01	Paper and cardboard	Unlikely to be accepted as single waste stream. These wastes would be mixed with general waste and separated through the process.	Low
20 01 02	Glass		Low-Medium
20 01 10	Clothes		Low
20 01 11	Textiles		Low
20 01 34	Batteries	Any batteries encountered would be removed for secured storage.	Negligible
20 01 36	Discarded electrical items	Any WEEE encountered would be removed for storage.	Low
20 01 38	Wood	Unlikely to be accepted as single waste stream. These wastes would be mixed with general	Low

		waste and separated through the process.	
20 01 39	Plastics		Low
20 01 40	Metals		Low
20 02 01	Biodegradable waste	This would include green waste.	High risk if accepted waste is wet and aged.
20 02 02	Soil and stones	Waste would be typically transferred direct to a site that can process this waste. Unlikely to be received as a routine waste stream at the site.	Low
20 02 03	Other non-biodegradable waste	This could include garden waste – tree prunings, leaves, grass)	Low
20 03 01	Mixed Municipal Waste – for example waste from office clearance and refurbishment	This could include general and refurbishment waste.	Medium risk of odour (if includes black bag waste)
20 03 02	Waste from Markets	(this would not include food waste)	Medium risk of odour (if includes black bag waste)
20 03 07	Bulky Waste	This would include collections from houses or businesses as whole items. For example, furniture. The furniture would be dismantled into component parts and stored as separate items for example wood and metal. Waste would be unloaded in reception area and separated into components and stored. This also includes soft furnishings that may contain POPs.	Low

The entire operational area is concreted.

The incoming mixed waste will be deposited within the building.

The waste processing building is 15m x 30m. It is a steel portal framed construction that is open on the eastern and northern elevations, which both face into the site. The roof is steel clad, with occasion roof lights.

The western and southern elevations comprise of a 3m high concrete panel wall, topped with wood cladding.

The building floor is approximately 0.5m below the surrounding ground level.

The second building is approximately 9m x 18m. This is a fully enclosed building with approximately 3m high concrete wall surround, topped with steel profiled cladding sheets, with a steel clad roof. It has three roller shutter doors on the northern elevation. This building will be used for baling recyclable waste.

All separated wastes, wood, plastic, plasterboard, cardboard and metal will be stored separately for onward processing at authorised facilities.

Waste Treatment

The waste will be unloaded into the main processing building. There will be an initial sort to remove large items such as concrete, wood and metal. Plasterboard will also be removed at this stage. It will be placed into a container. Large cardboard items will also be placed in a separate container.

Most of the sorting will be carried out manually or using a machine. The remaining waste will then be transferred into a trommel. The trommel will remove fines which will be stored beneath the trommel. There will be a small picking station separating cardboard and wood into containers beneath the conveyor belt. There will be two blowers, transferring lightweight waste into a caged bay. A magnet will remove metal, with the remining hardcore discharging into a bay at the end of the process.

Any black bags will be placed in the residual waste bin for off-site removal.

All separated wastes, wood, cardboard, plasterboard, and metal will be stored separately for onward processing at authorised facilities. Dry recyclables may be baled in the Baling Building. The waste will be transferred in a container to the other building. The door will be opened, and the waste unloaded into a bay. It will be baled, with the bales stored inside this building. When loading, a curtain sided trailer will park alongside the building and a fork lift truck will load the bales directly into the trailer.

The annual permitted throughput of the facility will be 25,000 tonnes.

The process capacity of the trommel will be 50 tonnes per day.

The maximum amount of mixed waste that will be on site at any one time will be 500 tonnes.

3 Odour Management

3.1 Responsibility for Implementation of the Odour Management Plan

The Technically Competent Manager (TCM) has responsibility for ensuring these procedures are adhered to which includes communication with staff and contractors, and the provision of adequate training.

The Technically Competent Manager is responsible for updating and re-issuing these procedures as necessary and ensuring all staff are trained in new procedures. The TCM will be the main point of contact for ensuring implementation of this plan. In their absence, the Site Supervisor will be responsible for implementation.

All staff will be trained in these procedures. Staff training is set out in EMS-OP-01. All staff will be trained to a standard which enables them to perform the responsibilities. The TCM is responsible for delivering training and maintaining records. Training is reviewed on an annual basis.

A record of staff training will be kept for each staff member which includes inductions to new processes and procedures as needed. EMS-FR-03.

If there are any changes to the operation which affect the odour management at the site, the TCM will carry out revised training and update the Management Plan accordingly.

The OMP will be reviewed on an annual basis or sooner if requested by the EA. It will also be updated if the operator changes the operation.

The operator is a family run business. The waste collected will be from their own waste collection business and therefore the operator will have full control over the waste inputs and treatment. The operator's family live at the site and have been part of the local community for many years.

The Odour Management Plan identifies the potential sources, pathways and receptors that may be sensitive to odour.

3.2 Source

The waste to be managed at this site will typically include mixed construction waste (wood, plastic, hardcore, metal, cardboard, textiles). These wastes are not typically odorous. The site will treat waste from office refurbishment projects, household clearances and local building projects.

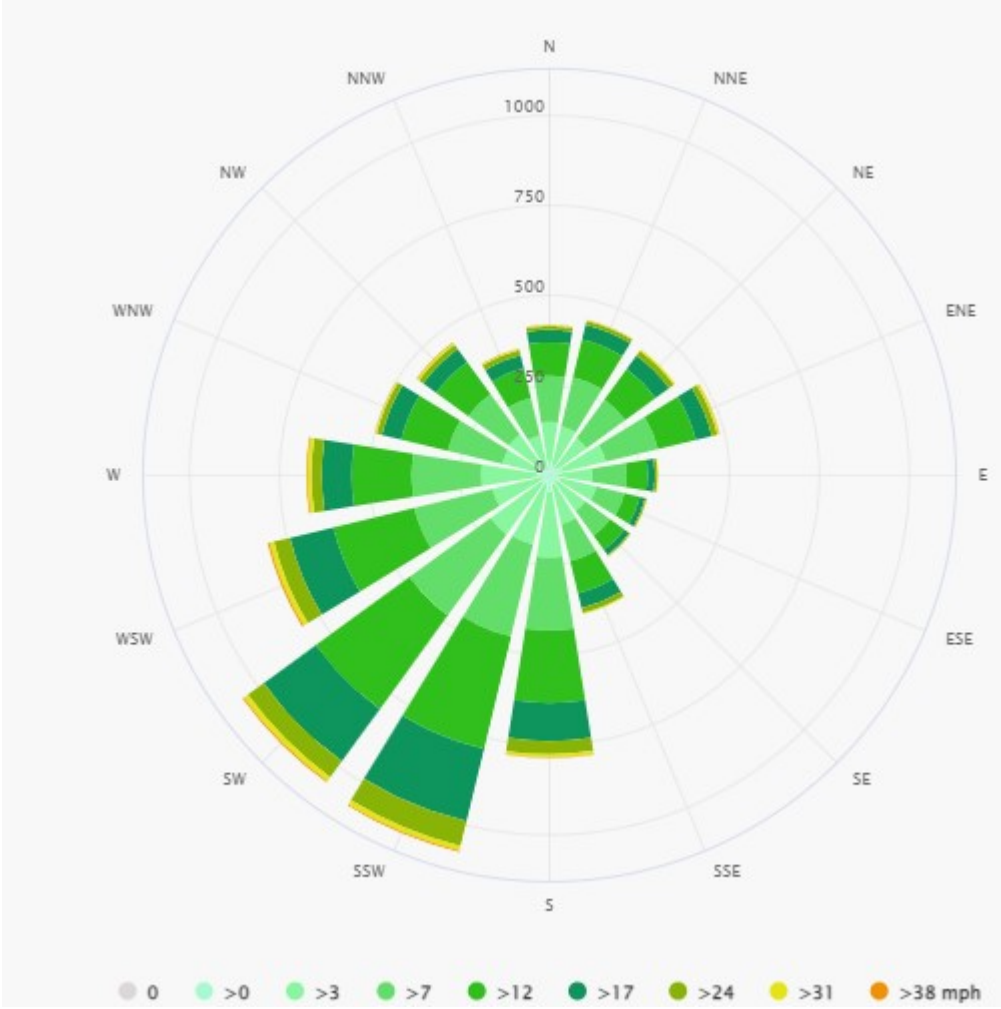
The main waste code to be accepted at the site will be EWC 170904 – mixed construction waste. Table 1 provides the list of wastes to be included on the permit, that may be delivered occasionally as single sourced waste streams.

The proposed list of wastes includes wastes the same in nature to those found in a mixed load. The wastes would be accepted with the same controls and same mitigation measures. None of the wastes listed significantly change the odour risk associated with the facility.

3.3 Pathway

The pathway for odour will be the atmosphere. The prevailing wind in this location is the south westerly. Figure 1 provides the wind rose for the locality.

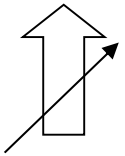
Figure 1 – Wind Rose Data (for London Heathrow)



3.4 Receptors

Figure 2 shows the site and broad location of the main receptors within 1km. Table 2 provides a description of those receptors and the distance and direction from the site. The distance has been measured from the permit boundary, at the closest point.

Figure 2 - Site Setting and Receptors (The permitted site is shown with a green boundary) Blue shows 1km radius from centre point of site.



South Westerly
Wind Direction

Table 2 – Receptors

Receptor	Legend	Type	Sensitivity	Distance and Direction from Permitted site
House (unnamed and Farmside Cottage)	R1	Residential	High	60m - 80m North (both with operator's control and occupied by family members)
Primrose Cottage (within farm holding)	R2	Residential	High	108m North West
Hill End Road	R3	Residential	High	300m North East
Canal Way	R4	Residential	High	340m West
Bellevue Terrace	R5	Residential	High	200m South West
Barrington Drive	R6	Residential	High	400m South West
Springwell Lane	R7	Residential	High	540m North East
The Harefield Care Home	C1	Care Home	High	250m East
Deep Contractors	C2	Commercial	Low	250m West
Maple Lodge Water Treatment Works	C3	Commercial	Low	580m North West
Harefield Hospital	H	Hospital	High	760m South East
Old Park Wood Nature Reserve/Old Park Wood SSSI	NR1	Nature Reserve	Low	<5m West
Tumbling Bay Lake	SW1	Surface Water	Low	520m West
River Colne	SW2	Surface Water	Low	450m West
Hillingdon Trail	FP1	Public Right of Way	Low-Medium	100m South

The ecological designations, roads, and surface water are not sensitive receptors to odour. Footpath users are transient receptors.

3.5 Assessment

All waste will be received, treated and stored in a building. The building is contained on the western and southern facades. The building opens towards the east, in front of which is a large agricultural shed.

The site will not routinely accept biodegradable waste such as food or other waste which are typically odorous. However, such waste could be received at the site within other loads. Such waste would be segregated and placed in a container for off-site removal. This will be a close lidded bin and arrangements made to remove the waste within 1-2 days. This will be recorded in the site diary and the Site Manager notified.

The waste will be received and treated on a first in – first out principle. During normal working conditions, the skip waste will be unloaded and sorted the same day. If for any reason, the waste remains overnight, it will be sorted the next working day.

As part of good housekeeping the receiving waste bay will be cleaned each time it is empty.

In the absence of a likely source of odour, the nature of the operations combined with the distance and direction of the nearest receptors, the risk associated with odour is low.

3.6 Mitigation

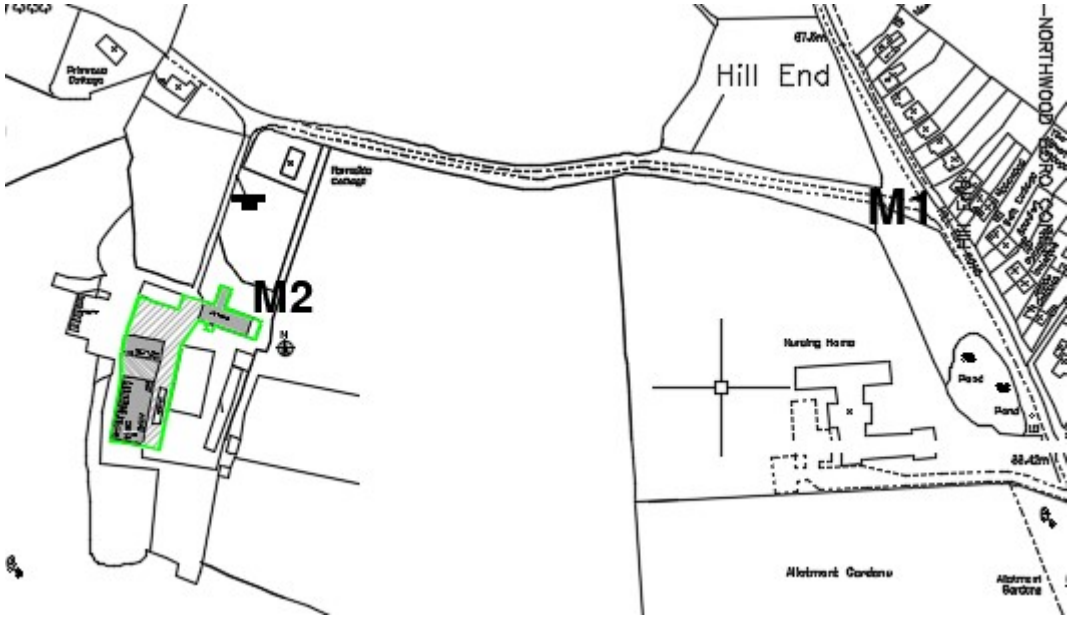
The following procedures will reduce odour emissions at the site.

- Vehicles will only be unsheeted when ready to discharge.
- Regular cleaning of the site to prevent any waste accumulating at the site.
- Any odorous waste will be segregated and placed in the residual bay for off-site removal.

3.7 Monitoring

As part of the daily checks, the Site Manager will check the condition of the road and check if odour is being generated and leaving the site (M1). This exercise will identify whether odour is being generated from other sources in the area. Within the site boundary, M2 will be used to assess if odour is leaving the building and being transferred to the north east of the site (downwind of prevailing wind). These are shown on Figure 3 and on Drawing No. HEP-WEY-MON-02.

Figure 3 – Location of Monitoring Points



If the Site Manager detects odour, a record will be made in the site diary with the following information:

- Date/Time
- Location
- Nature of Odour

If the nature of the odour has been caused by a staff action, the Site Manager will carry out further training to prevent a repeat incident. If the odour is being caused by an external source, this will be noted in the site diary.

A record will be made of any incident, complaint and corrective action.

The complaint procedure set out in the EMS will be implemented in the event of an odour complaint being received.

The controls set out are sufficiently robust to manage any odorous waste and prevent any harm to the local amenity.

A review of this Plan will be carried within 12 months as this will allow the operator to fully commission the treatment process and identify whether further controls are required.

In addition, if odour complaints are received, this plan will be reviewed. Additional mitigation measures can be implemented. Such measures could include providing a deodoriser.