ODOUR MANAGEMENT PLAN - EPR/FB3101HW

2, Yard Old Swan Road, Newton-le-Willows, Merseyside, WA12 0EZ

Gings Ltd

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1 Introduction

1.1 General

1.1.1 Oaktree Environmental Ltd has been instructed by Gings Ltd to prepare an Odour Management Plan ("OMP") for their site situated at 2, Yard Old Swan Road, Newton-le-Willows, Merseyside, WA12 0EZ.

1.1.2 In addition to this OMP, the site will be operated in accordance with an Environmental Management System (EMS) and Fire Prevention Plan (FPP) along with other documents targeted to specific environmental considerations. This OMP and all other site documents are stored within the site office and available for staff.

1.1.3 This OMP will allow Gings Ltd 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.

1.1.4 This document has been prepared in accordance with the Environment Agency's H4 Odour Management - how to comply with your environmental permit published on 04/04/2011.

1.2 Facility overview

1.2.1 The site currently operates under Environmental Permit (EP) EPR/FB3101HW which is an old-style bespoke EP allowing the manual sorting and transfer of household, commercial and industrial (HCI) wastes. This OMP has been produced to accompany a variation to the permit and it is considered the following proposals could lead to the risk of odour generation from the site to be increased:

i) Allow treatment of waste by manual sorting, separation, screening, shredding, crushing, or compacting waste
ii) Allow mixed waste to be accepted, stored and treated in external areas of the site as per information submitted in accompanying management plans

iii) Increase the permitted throughput from 5,000 tonnes per annum to <75,000 tonnes per annum.

iv) Add additional EWC codes which have the potential to cause odour, these are shown in Section 3.

1.2.2 All relevant operational staff will be suitably trained to ensure they understand the purpose of this OMP and understand what actions need to be taken in event of a complaint. Training will be taken by the site manager, technically competent manager/s (TCM/s) or third-party Consultant.

1.3 Site Location

1.3.1 The site is located on Land at 2, Yard Old Swan Road, Newton-le-Willows, Merseyside, WA12 0EZ. The national grid reference for the site is SJ 5582695593.

1.4 Hours of operation

1.4.1 The site is operated according to the hours specified below:

Monday to Friday	08:00 - 17:00
Saturday	08:00 - 13:00
Sundays, Bank/Public holidays	No operations

1.4.2 The only activities on site which will be permitted outside of these hours are onsite maintenance works, emergency deliveries of waste/plant/machinery and general office use. During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised vehicular and/or pedestrian access.

1.5 Waste Types and Quantities

1.5.1 The waste types handled on site considered to create an odour risk will comprise household, commercial and industrial wastes as defined in the Controlled Waste (England and Wales) Regulations 2012 and Section 75 of the Environmental Protection Act 1990.

1.5.2 The maximum amount of waste to be stored on site at any one time is shown on Drawing No. SWAN/3345/03 with residence times for each waste type.

1.5.3 If the maximum storage capacity is reached then no further waste will be accepted until waste can be removed from the site and taken to a suitably permitted or exempt site.

1.5.4 The table overleaf details a summary of the main wastes types which will be accepted and stored at the site which have the potential to generated odour.

Table 1.1 – Waste storage table for stored for potentially odorous wastes only

Plan Ref	Description	EWC code/s	Storage type	Height / width of firewall (m)	Max Width (m)	Max Length (m)	Height (m)	Max area (m2)	Conversion factor used	Volume (m3)	Tonnage (approx.)	Maximum storage durations	Storage type
AREAS 5 & 7A	>150mm light residual waste	19 12 12 (shredded waste sent as SRF)	Processed / shredded	4 / 0.8	8	7	3	56	0.75	126	42	<5 days	-1 **Medium** – May contain small amounts of putrescible material resulting in a slightly unpleasant / moderately offensive.
AREAS 6 & 7B	<10mm light residual fines	19 12 12 (trommel fines)	Processed / shredded / trommel	4 / 0.8	7	5	3	35	0.75	79	26	<5 days	-1 **Medium** – May contain small amounts of putrescible material resulting in a slightly unpleasant / moderately offensive.
AREA 8	>150mm light residual waste (pre-shred pile) - pile clear one hour before end of day	Mixture of 15 01 01, 15 01 02, 15 01 05, 15 01 09, 15 02 03, 19 12 01, 19 12 08, 19 12 10, 19 12 12, 20 01 01, 20 01 10, 20 01 11, 20 03 01	Hand sorted or by grab arising from tipping area (unprocessed)	N/A	15	13	4	135	0.333	180	59	<11 hours	-1 **Medium** – May contain small amounts of putrescible material resulting in a slightly unpleasant / moderately offensive.
AREA 12	Waste reception (tipping), inspection and sorting area	Mixture of 17 09 04, 20 03 01, 20 03 07	Free-standing / unprocessed	4 / 0.8	14	7	3	98	0.75	221	165	<72 hours	**Medium** – As delivered mixed wastes which may contain odorous substances/items Any potential odour likely to be unpleasant / offensive.
AREA 13	Sorted recyclables comprising wood, scrap metal, plasterboard, WEEE, uPVC, paper & card, plastic (loose >150mm) - pile based on each container size	02 01 04, 07 02 13, 12 01 05, 15 01 04, 17 02 03, 17 04 07, 17 08 02, 17 09 04, 19 12 04, 20 01 39, 19 12 01, 19 12 02, 19 12 03, 19 12 04, 19 12 05, 19 12 07 & 20 01 40	Hand sorted or pre-segregated	N/A	6.2	2.44	2.62	15.128	1	40	40	<5 days	-1 **Medium** – May contain small amounts of putrescible material resulting in a slightly unpleasant / moderately offensive.
AREAS 13 - 17 + non-conforming containers	Non-ferrous metal, WEEE, tyres and batteries (non-conforming) (pile size based on per bay)	11 02 03, 11 02 06, 11 05 01, 11 05 02, 12 01 01, 12 01 03, 16 01 03, 16 02 14, 16 02 16, 16 06 04, 16 06 05, 17 04 01 - 17 04 07, 17 04 11, 19 12 03, 20 01 34, 20 01 36 & 20 01 40	Hand sorted	4 / 0.8	5	4	3	20	0.75	45	40 - 50	<72 hours	-1 **Medium** – May contain small amounts of putrescible material resulting in a slightly unpleasant / moderately offensive.
AREAS 14 - 17	Sorted recyclables comprising wood, scrap metal, plasterboard, WEEE, uPVC, paper & card, plastic (loose >150mm) - pile based on each bay size	03 01 04, 07 02 13, 12 01 05, 15 01 04, 17 02 03, 17 04 07, 17 08 02, 17 09 04, 19 12 04, 20 01 39 19 12 01, 19 12 02, 19 12 03, 19 12 04, 19 12 05, 19 12 07 & 20 01 40	Hand sorted or pre-segregated	5	4	3	20	0.75	45	40 - 50	<72 hours	<5 days	-1 **Medium** – May contain small amounts of putrescible material resulting in a slightly unpleasant / moderately offensive.

1.5.5 The site could also accept other common waste types with odorous potential which have not been listed in the table. It is proposed if any of these wastes are discovered they would be stored in a segregated bay/container and removed from the site within 48 hours.

1.5.6 Prior to hiring out a skip to the customer, the operator will request confirmation of the contents to be placed in the skip so in the event the below wastes are accepted, they can be stored and removed as detailed below. The table below details the EWC codes for all odorous wastes which could be accepted into the site. The columns to the right indicate the level of risk associated to the waste type using a **high**, **medium**, **low** risk basis. As discussed, the site will only routinely store the wastes stored in the table on the previous page.

Table 1.2 – Accepted wastes with odour potential

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC		Odour potential -
CODE	**WASTE TYPE**	
02	**WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING**	
02 01	**wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing**	
02 01 03	plant-tissue waste	Medium
03	**WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD.**	
03 01	**packaging (including separately collected municipal packaging waste)**	
03 01 01	waste bark and cork	Low
03 03	**wastes from pulp, paper and cardboard production and processing**	
03 03 01	waste bark and wood	Low
07	**WASTES FROM ORGANIC CHEMICAL PROCESSES**	
07 02	**wastes from the MFSU of plastics, synthetic rubber and man-made fibres**	
07 02 13	waste plastic	Low
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	Medium
15 01 02	plastic packaging	High
15 01 05	composite packaging	Low
15 01 06	mixed packaging	High
15 01 07	glass packaging	Medium

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC		Odour potential -
CODE	**WASTE TYPE**	
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**	
17 02	**wood, glass and plastic**	
17 02 02	glass	Medium
17 02 03	plastic	Medium
17 08	**gypsum-based construction materials**	
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01	High
17 09	**other construction and demolition wastes**	
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	High
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE**	
19 12	**wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**	
19 12 01	paper and cardboard	Medium
19 12 04	plastic and rubber	Medium
19 12 05	glass	Medium
19 12 07	wood other than that mentioned in 19 12 06	Medium
19 12 10	combustible waste (refuse derived fuel)	High
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	High
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	Medium
20 01 02	glass	Medium
20 01 39	plastics	Medium
20 02	**garden and park wastes (including cemetery waste)**	
20 02 01	biodegradable waste	High
20 03	**other municipal wastes**	
20 03 01	mixed municipal waste	High

1.6 Site Management

1.6.1 The site will have a 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.

1.6.2 The company, through the TCM, 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 The table below highlights the intensity of the odour and provides a description by which to measure the intensity:

Table 2.1 – 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 The table below outlines the receptor sensitivity to odour which will be used when determining nearby odour sensitive receptors:

Table 2.2 – 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 in proximity to the site are shown on Drawing No. SWAN/3345/04. The nearest residential receptors are situated on Sandon Street which is approximately 360m north east of the site.

2.5 List of receptors

2.5.1 The receptors listed from the SRP are also shown in the table below with approximate distances to these properties.

Table 2.3 – Distances to Selected, Representative Sensitive Locations

Boundary	Receptor	Approximate distance from edge of site boundary (m)
North	Residential receptors in **R1** location	300 – 500
North	Residential receptors in **R2** location	675 – 1,000
South-east	Residential receptors in **R3** location	750 – 1,000
East – south-east	Residential receptors in **R4** location	500– 1,000
North-west	Grange Valley Primary School	785
South-west	Woodhouse Farm & Fishery	650
South-east	Ladybird Primary School	745

2.5.2 Other receptors not shown in the above table are illustrated on Drawing No. SWAN/3345/04.

2.6 Risk Matrix

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

Table 2.4 – 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 General waste - storage prior to processing

3.1.1 These wastes would be stored in the area shown as 'Waste reception area' (Area 1)' on Drawing No. SWAN/3345/03.

3.1.2 Whilst these wastes are not commonly associated with odorous emissions, they could contain some fine organic materials which can, in some cases, be attributed to a general "musty" odour. This smell is exacerbated following ingress of rainwater which occurs predominantly whilst the wastes are resident in skips/containers at the sites of production and prior to receipt at the site.

3.1.3 Whilst not common, these wastes have the potential to contain materials of a putrescible nature which are not identifiable until the load has been tipped at the site.

3.2 General waste - residual wastes for landfill

3.2.1 These wastes are essentially the lighter, non-recyclable fraction of the "general waste" input which is residual following sorting of wastes on site which are stored in dedicated holding bays (AREA 12) prior to sorting/treatment. Some of the finer organic materials are still likely to be present in the material, however, any putrescible materials (such as 'black bag' wastes) will have been identified, isolated and rejected during the sorting process. Therefore, these residual wastes for landfill have less potential to cause odour than the original mixed waste input described in Section 3.1 above.

3.3 Foul surface water

3.3.1 In the event of a rainfall incident, the external concreted area will drain by gravity to an to storage tanks as shown on Drawing No. SWAN/3345/03.

3.3.2 In the event of a rainfall incident which leads to a blockage of the drainage system, an emergency drainage consultant would be called to the site and water pooling in the external concreted areas of the site would be pumped from site.

3.3.3 Some skips which have stood on producer's sites for a long time often contain foul smelling water give rise to odour when tipped which will not be found until deposit in assuming the skip is sealed. The site infrastructure and drainage system would contain and remove any foul-smelling water.

3.4 Green wastes

3.4.1 Separated green wastes also have the potential to give rise to odorous emissions. It is important to note that the site is not a dedicated green waste handling facility – the green wastes produced at the site would comprise almost entirely of branches (with/without leaves) and tree trunks separated from skips of other mixed wastes. This means that the propensity for odour is much less than that of a dedicated green waste handling facility which accepts green waste consignments consisting of branches, tree trunks, leaves, tree clippings and grass cuttings. The leaves, tree clippings and grass cuttings (not routinely accepted at the site) harbour the greatest potential for odour due to their susceptibility to aerobic composting and decomposition whilst in storage, where branches and tree trunks are not susceptible.

3.5 Processing of waste

3.5.1 The processing of waste may result in odorous emissions; however, the risk of this occurring is considered to be low as generally the site will only comprise treatment and storage of wastes which have passed waste inspection thus will be free of any odour generating wastes.

3.6 Background Odour Sources in the Area

3.6.1 Due to the remote location of the site, it is considered that other odour generating sources would be fairly negligible. There are various agricultural and leisure facilities around surrounding areas which could potentially generate odour.

4 Odour control

4.1 Pre-acceptance checks

4.1.1 The driver collecting the skip will be trained (by site management) to identify any odorous loads in the skip and following an initial assessment, the driver will load the skip onto the wagon. If any odorous wastes are discovered, the driver would report back to site management who would contact the customer who would need to declare the contents inside the skip. Site management would then decide whether or not to accept the skip. This should prevent any odorous wastes being accepted at the site.

4.2 Waste acceptance procedure

4.2.1 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.

4.2.2 Any wastes identified during the incoming waste inspections which do not conform to site acceptance criteria will not be accepted. If the non-conforming waste is discovered following deposit, the waste will be loaded back onto the tipper vehicle and removed off

site or and quarantined immediately in a sealed/covered skip or container to await safe removal.

4.2.3 Drivers employed by Gings Ltd will be trained by site management (site manager, TCM or operations manager) to identify potentially odours within a load and provide instructions about odorous loads to site management to ensure the load can be visually inspected on arrival to the site or whether the load requires rejecting at source.

4.3 Site Operations

4.3.1 Limiting odour from the waste recycling 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.

4.3.2 This section addresses the general site management guidelines and identifies specific procedures to mitigate against odorous emissions.

4.4 Receiving Wastes

4.4.1 Rigorous control of wastes delivered to the site is required, with contaminated or odorous wastes (stored too long) rejected in line with the procedures in the EMS and EP. Trained competent staff are in place to recognize odorous material and to inspect incoming wastes as it is deposited at the site. Malodorous waste will be returned to the producer or sent to another authorised facility for treatment. Waste suppliers and HGV skip vehicle drivers are required to ensure that only acceptable material is brought to site to minimise the incidence of rejection. If staff continually bring odorous waste to the site, the operator will initiate their three-strike rule:

a) Additional waste type recognition training (see EMS)
b) A verbal and written warning
c) Refused entry into the site or potentially disciplinary.

4.4.2 The site may accept was from other transfer stations so it is difficult to provide an average age of waste but upon reception of waste after visual checks, any loads which contain significant amounts of odorous waste will be rejected as above.

4.4.3 **Age of wastes** - Gings Ltd hire out skips to customers for a maximum of 2 weeks meaning that the waste received is unlikely to generate significant odorous emissions unless upon tipping. If unauthorised waste is discovered by trained staff following tipping, then actions shown in sections 6.1 and 6.2 will be followed.

4.4.4 All deliveries of mixed waste are directed to **AREA 12** and removed from this pile within 11 hours as a worst-case scenario to await processing therefore receiving wastes will not present an odour nuisance due to their low residence times. The waste in this bay will also undergo a full deep clean every 3 months.

4.4.5 Incoming mixed waste will be processed as soon as practicably possible to ensure that any other malodorous (or potentially malodorous) wastes contained within the incoming mixed waste which were not identified during deposit.

4.5 Storage of Wastes

4.5.1 The site will store the following odorous wastes the site on a daily basis, other odorous wastes may be accepted but will be infrequent i.e. once per week/month:

i) Incoming mixed waste – (20 03 01, 17 09 04) **Refer to AREA 12**
ii) Residual landfill waste – (19 12 12) – **Refer to AREAS 13 - 17**
iii) Plastic and wood waste– (15 01 02, 17 02 01, 17 02 03, 19 12 04, 19 12 06, 20 01 39 and 20 02 01) **Refer to AREAS 11 - 17**
iv) Plasterboard (17 08 02) – **Refer to AREA 13**
v) Processed mixed waste – (19 12 12) **Refer to AREAS 5 - 7**

4.5.2 Low storage volumes and strict turnaround of biodegradable wastes on site in accordance with the table on Drawing No. SWAN/3345/03 will be observed. Stock rotation procedures

as detailed in the site's FPP will be observed to ensure the maximum duration of storage times are not exceeded. The table below details how they will be handled and stored on site:

Table 4.1 - Waste storage / monitoring for odorous wastes on site

AREA 12 WASTE RECEPTION AND SORTING AREA	• The waste in this stockpile is the main reception for skip waste received at the site. • Any waste identified after tipping which has the potential to cause odours i.e. a black bin bag, food waste, green waste, packaging with residues will be removed from the pile and stored in a mobile rejected waste container. The container would be removed off site within 48 hours. • Within this area, operatives will remove the light materials into **AREA 8** and the heavier materials into **AREA 9**. It is considered the wastes in **AREA 9** will not cause odour as they comprise 95% inert and in terms of **AREA 8**, this will continually move and be processed inside the building. • The stockpile is dynamic and staff can sort a skip in less than 1 hour meaning this area will not technically store any waste. • The site will not tip any further skips 1 hour prior to shutdown ensuring the area is clear out-of-hours. • If odorous waste is identified during monitoring, the site will investigate, find the root cause and quarantine the odorous load in sealed containers which will be removed from site as soon as practicable.
AREAS 5 – 7 SORTED & SHREDDED REFUSE DERIVED FUEL MATERIAL	• This waste will have been sorted from **AREA 12 following** a visual inspection, the sorted waste is transferred to **AREA 8** to await processing. • The waste from **AREA 8** is fed into a shredder, the shredder them feeds into a trommel, the trommel discharges the fines below and the larger items pass through the trommel and off the end conveyor. • These wastes are all stored inside the building and usually store waste <48 hours (based on experience), but 72 hours has been provided in the event of any extenuating circumstances i.e. breakdowns, transport failures. If the wastes exceed a period of 48 hours, the site will increase monitoring to three times a day every 12 hours.
AREAS 13 - 17 SORTED & PROCESSED WOOD, PLASTIC & OTHER WASTES	• These bays or containers will be for holding the specified materials until the bay reaches capacity, usually <72 hours (based on experience), possibly 5 days in the event of any extenuating circumstances i.e. breakdowns, transport failures. If the wastes exceed a period of 72 hours, the site will increase monitoring to three times a day every 12 hours. • All wastes are stored allowing a 1m freeboard between each bay to ensure the pile does become one large pile. • Due to the strict waste acceptance procedures, it is considered the waste in these piles will present a very low risk of odour as they comprise only sorted wastes.
AREA 13 PLASTERBOARD SKIP	• This area comprises plasterboard which has been sorted from **AREA 12** or arriving at the site pre-segregated. • The plasterboard will be stored inside a sealed skip. • The plasterboard skip will be covered, other than when loading meaning it should not become wet and degrade. • The same procedures apply as the above.

4.5.3 If any other odorous wastes shown in section 1.4.4 are accepted, they will be tipped, sorted, stored and removed from the site within 48 hours.

4.5.4 Waste will be stored to ensure compliance with the EP and as detailed in the EMS, FPP and this OMP document.

4.6 Loading and Transport of General Wastes

4.6.1 In all cases, the drop heights of mixed waste will be kept to an absolute minimum. All waste vehicles entering/leaving the site containing light and/or potentially malodorous wastes will be securely sheeted or enclosed at all times to ensure that odour pollution is not caused beyond the site boundary via queuing collection/delivery vehicles.

4.7 Housekeeping

4.7.1 Regular cleaning of operational areas (i.e. minimum once daily) such as impermeable surfaces and drainage channels will be carried out using mobile plant and water supplies to discourage odour generation from old degrading materials. The site may install other items of housekeeping plant such as a road sweeper to clear up smaller particles of waste if odour is found to be present. The odorous materials will then be placed in a sealed rejected waste skip which will be removed every 48 hours or sooner if staff detect odorous emissions following daily inspections. Site management will delegate these tasks to operational staff and seek radio or written confirmation that the tasks have been complete and whether any odours have been detected.

4.7.2 In addition to daily visual monitoring of the site; site management will monitor the integrity of onsite building on a quarterly basis. In the event that there are any issues resulting in odour escaping then maintenance works will be carried out within 48 hours.

4.7.3 **Housekeeping schedule** - 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
- Suppress storage bays during dry and hot weather conditions
- Jet spray and disinfect storage bays once per quarter
- Clean equipment that has been in contact with odorous materials
- Carry out a deep clean of the reception area once a quarter and record this in the site diary
- The sealed drainage system is functioning.
- Concrete surface is sealed to prevent absorption and adsorption of odour producing residues.
- Solid waste storage containers shall be robust, easily cleanable, designed for safe handling, and constructed to prevent loss of wastes from the equipment 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.
- Periodically treat drainage systems with bacteria-inhibiting solution.

4.8 Site Infrastructure

4.8.1 The site will install the following measures to ensure odours do not escape beyond the boundary.

- **Monitoring** – The site carries out Olfactory/Sniff assessments which have been outlined further in Section 5 of this OMP. The monitoring points may vary on/off site depending on the location and speed of the wind so are therefore not included on the site plan. The EA can request where inspection points have taken place following a review of paperwork.
- **Stock rotation** – All potentially odorous wastes will be contained within 3-sided bays or containers that undergo continuous monitoring. The site follows the first in, first out principle which ensures that the oldest wastes are removed from the site first and aren't left to stand for a long period of time.

- **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. The site has a housekeeping schedule shown in section 4.7.
- **Storage procedures** – All odour wastes are contained within bays or containers. Odorous wastes will not be stored for longer than 1 week ensuring that wastes are not left to stagnate; in most cases potential odour generating wastes will be cleared from the site by the end of the working day.

4.8.2 In the event that there are any issues the building maintenance/repair works will be carried out within 48 hours.

4.9 Liaison with Neighbours

4.9.1 In the event of an odour release due to unforeseen extenuating circumstances, residential receptors within will be contacted by face to face to advise them of the situation and the action being taken. The EA will also be notified.

4.9.2 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.

4.9.3 If any odour complaints are received, the complaint will be assigned to an operative familiar with the sites operation who will complete a 'complaints and events log' and 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.

4.9.4 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 continuing.

4.10 Training

4.10.1 All employees and sub-contractors of Gings Ltd involved with potentially odorous materials and their handling will receive training in Sniff testing (including office/admin workers allocated to undertake the Sniff test) and complaint reporting (management and operations staff).

4.10.2 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 and reporting of odours can be carried out.

4.10.3 Training will be carried our by the site manager, operations manager or TCM and will be carried out every 6 months or sooner in the event of an odour complaint, changes to site operations, additional potentially odourous EWC codes being accepted at the site or an update to this OMP.

5 Monitoring

5.1 Monitoring Odorous Releases

5.1.1 Gings Ltd 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 The site supervisor will monitor odour around the entire site perimeter daily and an Odour Diary will be completed (Appendix II). The monitoring will be carried at intervals out while the site is operational, additional monitoring may be carried should there be reason to suspect a potential odour problem (potentially malodorous waste onsite, foul surface water issues etc.).

5.2.2 The results of monitoring exercises and any remedial action taken will be entered into the log book 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 offsite, steps will be made to reduce the impact of this activity, which may include, but not limited to; removal of the odour source to a suitably permitted site, 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. Further information regarding training and technical competence is provided within the site's EMS.

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

5.3 Odour Monitoring Procedure

5.3.1 Sniff testing will be carried out by trained; competent staff daily (minimum once) should the management have reason to suspect odorous emissions from the site or complaints received. Assessments will be carried out both routinely and in response to specific complaints.

5.3.2 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.

5.3.3 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 e.g. remove odorous materials off site as soon as reasonably possible. 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)

b) If on site:

i) Report incidence to the site 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 actions taken if odour is being produced on site will be:

a) **Normal Operations**: 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.

b) **Abnormal Conditions**: 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 odour causing operations will cease until more favourable meteorological conditions return.

6.2 Corrective Actions for Various Situations

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

Table 6.1 –Corrective actions

Process	Problem	Corrective Action
Waste Delivery (Tipping)	Deposit of odorous load	Isolate material. Reject material giving rise to odour.
Stored wastes (general)	Odorous emissions detected	Olfactory/SNIFF test required to pinpoint source. Ensure procedures outlined in Section 5 are adhered to in full. Remove malodorous waste to a suitably permitted facility. Implement liaison programme if risk deemed HIGH or VERY HIGH i.e. strong or severe as shown in Table 2.1.

6.3 Staff shortages/human error

6.3.1 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 further employment within a timely manner to ensure the site can continue to operate at its required capacity.

6.3.2 All staff are 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 to 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.

6.4 Weather conditions / emergency situations

6.4.1 The site will set up a notification alert system with the Met Office to receive updated weather information for the following weather conditions which could cause a potential on or off-site odour issue:

- High winds >30mph which could exaggerate an odour
- Droughts or periods of hot weather exceeding 3 major dry days which could lead to water shortages, hosepipe bans and excessive odour
- Flooding

6.4.2 The site would install the following preventative/contingency measures (in addition to control measures in Section 4) to avoid serious odour issues as a result of the above weather conditions or fire incident:

- Stockpiles containing any odorous waste will be removed into containers or removed off site to a suitably permitted site as soon as practicable.
- Contact an additional haulier to help remove the waste on site.
- Suspend any further waste deliveries to the site.
- Contact the EA to agree a suitable course of action
- Contact members of the public or any other persons who could be affected by the odour and advise of the contingency measures the site has employed and timescales when the odour is likely to be reduced.

6.5 Operational failure

6.5.1 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 and the EA will be contacted. It is considered an operational failure could also result in the potential risk of increased storage volumes and duration for odorous wastes. Staff would be trained

by site management to identify this risk and site management would take the decision whether or not to divert incoming waste to alternative facility until the waste can be stored and managed as shown in Table 1.1.

6.5.2 All repairs to site security will be made within on the discovery of the damage if possible and the site will be made secure until the repair has been carried out.

6.5.3 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.

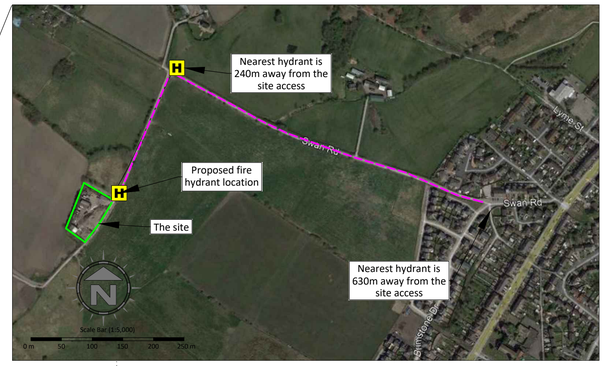
6.5.4 All defects and problems likely to give rise to odour will be recorded on the form 003/RF/4 or the operators own recording procedures with repairs/solutions being carried out immediately; neighbours will be alerted if the problem cannot be rectified immediately and provided a timescale when the problem will cease.

6.6 OMP Management

6.6.1 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 within 7 days and a copy forwarded to the Environment Agency for approval before implementation. It may also be revised upon request from EA, should the permit be varied, transferred etc.

Appendix I

Drawings



NOTES

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	29.02.24	CP	Initial drawing

Key:

- Permit boundary
- Waste storage areas
- Non-waste fuel, fluids, gas and cylinder storage
- Temporary storage/sorting areas
- Non-waste storage areas
- Concreted areas
- Waste recycling / storage buildings (impermeable concrete floor)
- Office/welfare
- Out-of-hours plant storage
- 300mm thick solid concrete wall
- Quarantine area
- Fire fighting equipment / extinguishers (indicative locations)
- Fire alarms (indicative location)
- Spill kits (indicative location)
- Plant shut off
- Hose reel
- Mains water
- Designated smoking area
- Access route for emergency services
- Fire hydrants
- Fire assembly points
- Pan, tilt and zone cameras with 360° 50m coverage
- Gully
- Surface water fall direction
- Contaminated drainage

Waste Storage Area Details - PILE SIZES BASED ON AREA OF STOCKPILE ON SITE PLAN NOT LENGTH X WIDTH

Plan Ref	Description	EWC code/s	Storage type	Containment	Height / width of firewall (m)	Max Width (m)	Max Length (m)	Height (m)	Max area (m2)	Conversion factor used	Volume (m3)	Tonnage (approx.)	Maximum storage durations
AREAS 1 - 4	Bulky inert i.e. hardcore, stone including crushed material	19 12 12 (aggregates)	As above	Free standing inside a three-sided concrete interlocking block storage bay	4 / 0.8	5	4	3	20	0.75	45	54	<4 weeks
AREAS 1 - 4	<40mm screened (inert) fines soils, stones	19 12 12 (qualifying fines / screened soils) - received from AREA 9	Sorted (by screen)	Free standing inside a three-sided concrete interlocking block storage bay	4 / 0.8	5	4	3	20	0.75	45	54	<4 weeks
AREAS 5 & 7A	>150mm light residual waste	19 12 12 (shredded waste sent as SRF)	Processed / shredded	Free standing inside a three-sided concrete interlocking block storage bay	4 / 0.8	8	7	3	56	0.75	126	42	<5 days
AREAS 6 & 7B	<10mm light residual fines	19 12 12 (trommel fines)	Processed / shredded / trommel	Free standing inside a three-sided concrete interlocking block storage bay	4 / 0.8	7	5	3	35	0.75	79	26	<5 days
AREA 8	>150mm light residual waste (pre-shred pile) - pile clear one hour before end of day	Mixture of 15 01 01, 15 01 02, 15 01 05, 15 01 09, 15 02 03, 19 12 01, 19 12 08, 19 12 10, 19 12 12, 20 01 01, 20 01 10, 20 01 11, 20 03 01	Hand sorted or by grab arising from tipping area (unprocessed)	Free standing inside a three-sided concrete interlocking block storage bay	N/A	15	12	4	135	0.333	180	59	<11 hours
AREA 9	Mixed C&D waste (95% inert)	15 01 07, 17 02 02, 17 06 04, 17 09 04, 19 12 05, 20 01 02 (inert waste only with minor constituents)	Hand sorted or by grab arising from tipping area above (unprocessed)	Free standing inside a three-sided concrete interlocking block storage bay	4 / 0.8	7.2	6	3	43.2	0.75	97	117	<5 days
AREA 10	Bulky waste i.e. mattresses	20 03 07	Hand sorted or by grab arising from tipping area above (unprocessed)	Free standing inside a three-sided concrete interlocking block storage bay	4 / 0.8	7.2	6	3	43.2	0.75	97	117	<5 days
AREA 11	Wood	17 02 01, 19 12 07, 20 01 38	Hand sorted or by grab arising from tipping area above (unprocessed)	Free standing inside a three-sided concrete interlocking block storage bay	4 / 0.8	7.2	6	3	43.2	0.75	97	117	<72 hours
AREA 12	Waste reception (tipping), inspection and sorting area	Mixture of 17 09 04, 20 03 01, 20 03 07	Free-standing / unprocessed	Free standing inside a three-sided concrete interlocking block storage bay	4 / 0.8	14	7	3	98	0.75	221	165	<72 hours
AREA 13	Sorted recyclables comprising wood, scrap metal, plasterboard, WEEE, uPVC, paper & card, plastic (loose >150mm) - pile based on each container size	02 01 04, 07 02 13, 12 01 05, 15 01 04, 17 02 03, 17 04 07, 17 08 02, 17 09 04, 19 12 04, 20 01 39 19 12 01, 19 12 02, 19 12 03, 19 12 04, 19 12 05, 19 12 07 & 20 01 40	Hand sorted or pre-segregated	Sealed containers	N/A	6.2	2.44	2.62	15.128	1	40	40	<5 days
AREAS 13 - 17 + non-conforming containers	Non-ferrous metal, WEEE, tyres and batteries (non-conforming) (pile size based on per bay)	11 02 03, 11 02 06, 11 05 01, 11 05 02, 12 01 01, 12 01 03, 16 01 03, 16 02 14, 16 02 16, 16 06 04, 16 06 05, 17 04 01 - 17 04 07, 17 04 11, 19 12 03, 20 01 34, 20 01 36 & 20 01 40	Hand sorted	Free standing inside a three-sided concrete interlocking block storage bay	4 / 0.8	5	4	3	20	0.75	45	40 - 50	<72 hours
AREAS 14 - 17	Sorted recyclables comprising wood, scrap metal, plasterboard, WEEE, uPVC, paper & card, plastic (loose >150mm) - pile based on each bay size	03 01 04, 07 02 13, 12 01 05, 15 01 04, 17 02 03, 17 04 07, 17 08 02, 17 09 04, 19 12 04, 20 01 39 19 12 01, 19 12 02, 19 12 03, 19 12 04, 19 12 05, 19 12 07 & 20 01 40	Hand sorted or pre-segregated	Free standing inside a three-sided concrete interlocking block storage bay	5	4	3	20	0.75	45	40 - 50	<72 hours	<5 days

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

DRAWING TITLE
SITE LAYOUT & FIRE PLAN

CLIENT
Gings Ltd

PROJECT/SITE
2, Old Swan Road, Newton-le-Willows, Merseyside WA12 9YU

SCALE @ A1	CLIENT NO	JOB NO
1:200	3345	003

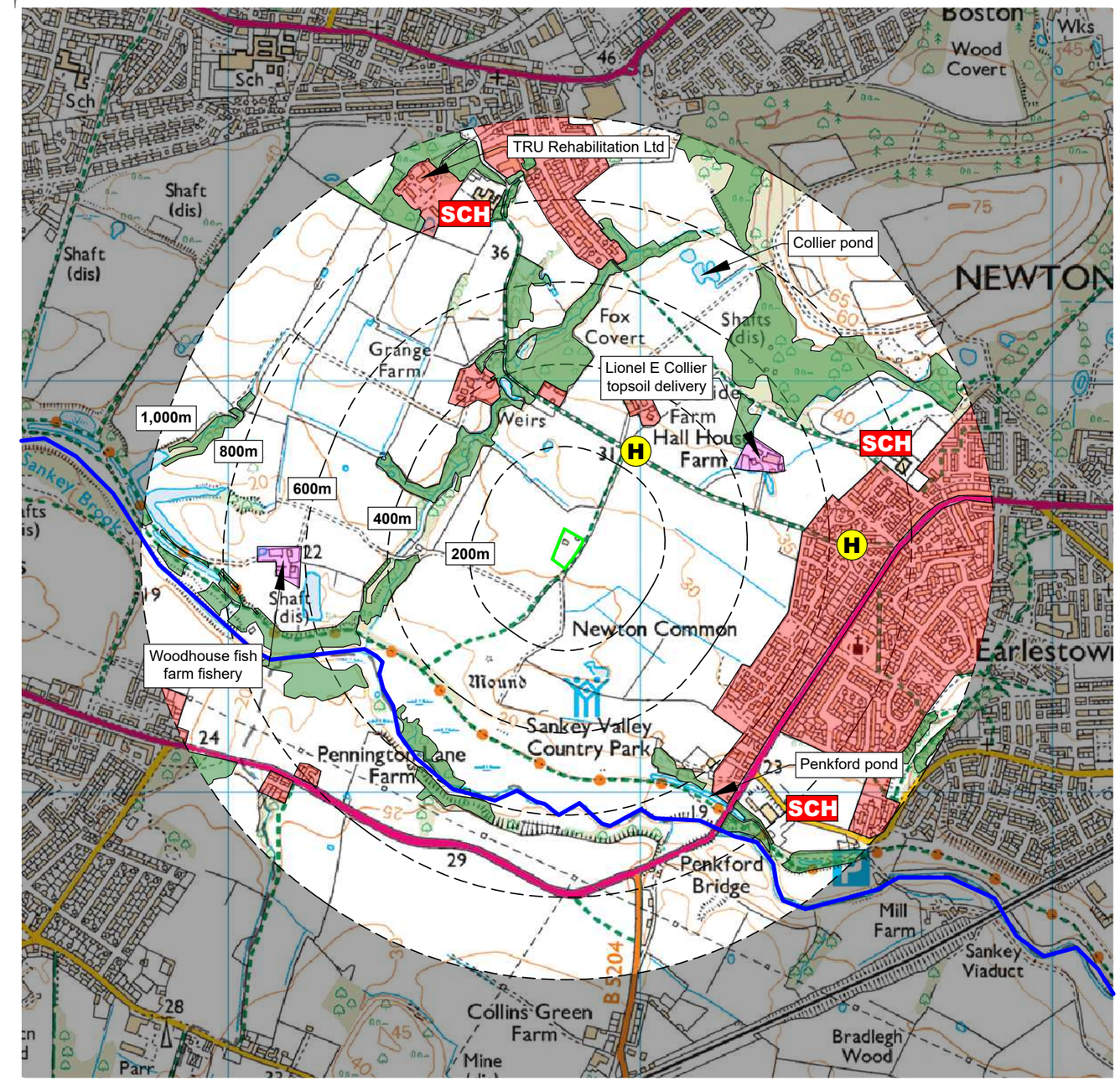
DRAWING NUMBER	REV	STATUS
SWAN/3345/03	-	Issued

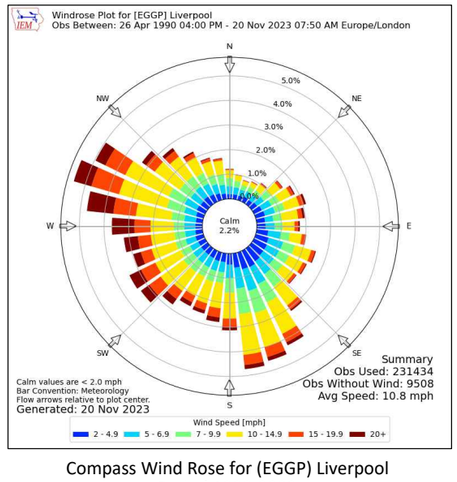
DRAWN BY	CHECKED	DATE
CP	--	29.02.24

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

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)





Compass Wind Rose for (EGGP) Liverpool
Period 1990-2023
- source: Iowa State University

Scale Bar (1:12,500)

0 km 500 m 1 km

NOTES

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

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	29.02.24	CP	Initial drawing

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

DRAWING TITLE
RECEPTOR PLAN

CLIENT
Gings Ltd

PROJECT/SITE
Old Swan Road, Newton-le-Willows, Merseyside WA12 9YU

SCALE @ A3	CLIENT NO	JOB NO
1:12,500	3345	003

DRAWING NUMBER	REV	STATUS
SWAN/3345/04	-	Issued

DRAWN BY	CHECKED	DATE
CP	--	29.02.24

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

Appendix II

Record Forms

GINGS LTD
ODOUR DIARY

Complaints Report Form (003/RF/7)

Odour Diary				**Sheet No**
Name: **Telephone Number:**	**Address:**			
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)

GINGS LTD
COMPLAINTS REPORT FORM (003/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 003/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.