# ODOUR MANAGEMENT PLAN – PERMIT REF. RP3296CB

ADS Recycling, 63 Camsley Lane, Lymm, Warrington, Cheshire, WA13 9BY

#### **Neil Thomson T/A ADS Recycling**

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## 1 Introduction

#### 1.1 General

- 1.1.1 Oaktree Environmental Ltd have been instructed by Neil Thomson trading as ADS Recycling (the Operator) to prepare this Odour Management Plan (OMP).
- 1.1.2 This OMP assesses the risk of odour associated with the storage and treatment of waste at ADS Recycling, 63 Camsley Lane, Lymm, Warrington, Cheshire, WA13 9BY and provides mitigation and control measures implemented in relation to odour from waste operations undertaken at the site.
- 1.1.3 The permit boundary is illustrated in green on Drawing No. CAMS/461/02 Permit Boundary Plan. All reference to 'the site' in this OMP refers to the associated operations, infrastructure, plant, and equipment within this boundary.
- 1.1.4 The site is operated in accordance with Environmental Permit ref. EPR/RP3296CB (the Permit). This OMP has been produced to accompany a permit variation application.
- 1.1.5 The site is operated as a non-hazardous household, commercial and industrial (HCI) waste transfer station with treatment facility. The following threatment activities / operations are undertaken on site:
  - a) Sorting (with loading shovel/360° excavator or by hand).
  - b) Manual separation (by picking line).
  - c) Screening (by using appropriate mechanical screening plant and equipment).
  - d) Mechanical separation (by using appropriate density separator).
  - e) Baling (by using an appropriate handfed manual baler).
  - f) Storage (prior to removal).

- 1.1.6 It is considered some HCI wastes have the potential to emit odour, a small quantity of processed HCI waste is stored externally and therefore it is considered to have potential for detectable odour to be released from site beyond the permit boundary. This OMP has been developed with the specific aims of ensuring:
  - a) All potential odour sources are identified.
  - b) Odour impact is considered as part of routine inspection.
  - c) The minimisation of the risk of unplanned odour releasing incidents or accidents that could result in offsite annoyance / complaints.
  - d) Odour is primarily controlled at source by good operational practices, the correct use and maintenance of storage areas and operator training.
- 1.1.7 This OMP has been produced in accordance with the following guidance:
  - a) Environment Agency's guidance: Develop a management system: environmental permits (updated April 2023).
  - b) Environmental permitting: H4 odour management (published April 2011).
- 1.1.8 In addition to this OMP, an 'Environmental Risk Assessment' has been prepared which considers potential risks (including odour) from operations on site, see document ref. CAMS/461-D.
- 1.1.9 The site is also managed and operated in accordance with a fully comprehensive Environmental Management System (EMS).

### 1.2 Site Location & Infrastructure

- 1.2.1 The site is located at ADS Recycling, 63 Camsley Lane, Lymm, Warrington, Cheshire, WA139BY and can be accessed via Stockport Road.
- 1.2.2 The site is situated in a predominantly semi-urban area, the immediate land surrounding the site comprises of other commercial / industrial units, a handful of residential dwellings and open / agricultural fields.

- 1.2.3 The closest residential receptors are houses located 20m north of the permit boundary on Stockport Road. A full list of receptors within 1km of the site is provided in section 2.4, a sensitive receptor plan has also been included in Appendix I of this OMP illustrating the location of the site including surrounding receptors, see Drawing No. CAMS/461/04 Receptor Plan.
- 1.2.4 The infrastructure of the site comprises of a large waste transfer building where the acceptance, treatment and storage of wastes take place. The area of the building is approximately 2,156m² encompassing a large proportion of the site. The remainder of the site is made up of an impermeable concrete pad or free draining hardstanding (no waste operations are undertaken on hardstanding).

#### 1.3 Hours of Operation

1.3.1 The site will be open during the following hours for the delivery, receipt, and processing of waste:

Monday to Friday 08:00 – 17:00

Saturday 09:00 – 12:00

Sundays, Bank/Public holidays Closed

- 1.3.2 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.
- 1.3.3 During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised access.

#### 1.4 Reviewing and monitoring this OMP

- 1.4.1 This OMP will be reviewed bi-annually (once every two years) or in the event of the following:
  - a) If a change in operation is deemed to potentially increase risk of odour emissions.
  - b) Following a report or incident of odour.
- 1.4.2 It is the site managers responsibility for monitoring and implementing the requirements of this OMP.
- 1.4.3 Reference should be made to Section 4.10 which details procedures for staff training in the event of any changes in relations to the OMP.

#### 1.5 Waste Types and Quantities

- 1.5.1 The waste types handled on site will be 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 Table 1.2 with residence times for each waste type.
- 1.5.3 If the maximum storage capacity on site is reached or approaching 90% capacity, 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 majority of wastes that have the potential to produce odour will be accepted under the following EWC codes and stored in the following areas on site:
  - 17 08 02 Gypsum / plasterboard (AREA 1-5)
  - 20 03 01 Mixed municipal waste (AREA 6)
  - 20 01 39, 17 02 03 Mixed plastics (AREA 27A 27D)

- 1.5.5 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 that any of the below wastes with odour potential are accepted the operator can monitor for odour.
- 1.5.6 Table 1.1 below details the EWC codes for all potentially odorous wastes which could be accepted at the site. Each row is highlighted to indicate the level of risk associated with that waste type using a high, medium, low risk basis.

**Table 1.1 - Permitted Wastes with Odour Potential** 

Waste	Description
Code	
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
02 01 04	waste plastics (except packaging)
02 01 07	wastes from forestry
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS
02.04	AND FURNITURE PULP, PAPER, AND CARDBOARD
03 01	wastes from wood processing and the production of panels and furniture
03 01 01	waste bark and cork
03 01 05	Sawdust shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
03 03	wastes from pulp, paper and cardboard production and processing
03 03 01	waste bark and wood
15	WASTE PACKAGING: ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
15 01 07	Clean glass packaging
15 02	absorbents, filter materials, wiping cloths and protective clothing
15 02 03	absorbents, filter materials, wiping cloths, protective clothing other than
	those mentioned in 15 02 02
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED
	SOIL FROM CONTAMINATED SITES)
17 02	wood, glass and plastic
17 02 02	glass
17 02 03	plastic

17 08	gypsum-based construction materials
17 08 02	gypsum-based construction materials other than those mentioned in 17
	08 01
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition waste other than those mentioned in
	17 09 01, 17 09 02 and 17 09 03
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE
	WASTEWATER 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
19 12 04	plastic and rubber
19 12 05	glass
19 12 07	wood other than that mentioned in 19 12 06
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
20 01 02	glass
20 01 39	plastics
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste
20 03	other municipal wastes
20 03 01	mixed municipal waste

1.5.7 Table 1.2 overleaf details a summary of the main waste types which are accepted and stored on a daily basis at the site, the rows highlighted are considered to be those wastes which have the potential to cause odour. It is considered that odorous waste will not be stored for longer than the maximum durations shown.

Table 1.2 – Waste Storage Table

Waste storage area details												
Plan Ref	Description	EWC Code(s)	Processed / unprocessed	Containment	Max width of pile (m)	Max length of pile (m)	Max height of pile (m)	Approx. area (m2)	Conversion factor used	Approx. volume (m3)	Tonnage (approx.)	Storage duration
AREA 1-5	Sorted waste bays containing mixed waste, wood, green waste and plasterboard	17 09 04, 19 12 12, 20 03 01, 15 01 03, 17 02 01, 19 12 07, 20 01 38, 20 02 01	Hand sorted from the picking line	Free standing inside a three-sided concrete panel storage bays	5	6	3	30	0.75	68	34	<5 days
AREA 6	Mixed waste infeed pile	17 09 04, 20 03 01, 19 12 12	Hand sorted or using excavator	As above	10	10	3	100	0.75	225	113	<72 hours
AREA 7	Oversize non- recyclable waste	17 09 04, 20 03 01, 20 03 07	Partly hand sorted arising from tipping area	Free-standing bales inside sealed building	10	7	2	70	0.5	70	35	<72 hours
AREA 8A - 8B	WEEE skips	20 01 36	Source segregated or hand sorted	Open topped, moveable 40 cubic yard roll on roll off skips and wheelie bins	6.1	2.44	2.62	15	1	39	20 - 30	<5 days
AREA 8C	Cable bins	17 04 11	Source segregated or hand sorted	Sealed wheelie bins	0.5	0.72	1.1	0	1	0.40	0.20	<5 days
AREA 9	<75mm screened fines	19 12 12 (arising from AREA 16 and fed back into plant)	Mechanically sorted by flip flow screen and density separator	Free-standing inside a three-sided concrete wall	5	5	2	25	0.75	38	38	<72 hours
AREA 10	Residual lights (>75mm)	19 12 12 (non-qualifying fines)	Mechanically sorted by flip flow screen	Free-standing inside a three-sided concrete wall	7	7	2	49	0.75	74	37	<72 hours
AREA 11 - 14	Hand sorted recyclables i.e. wood, plastic, residual waste, cardboard etc	19 12 12, 19 12 07, 19 12 04	Hand sorted from the picking line after mechanical sorting from flip flow screen	Free standing inside a three-sided concrete panel storage bay	15	4	3	60	0.75	135	50 (per bay)	<72 hours
AREA 15	<25mm fines (inert)	19 12 12 (may be fed back through plant depending on moisture content)	Mechanically sorted by flip flow screen and density separator	Free standing inside a three-sided concrete panel storage bay	7	4	3	28	0.75	63	50 (per bay)	<72 hours
AREA 16	<25mm fines (non- inert/lights)	19 12 12 (tipped in AREA 6 and re-processed through plant or removed off site)	Mechanically sorted by flip flow screen and density separator	Open topped, moveable 20 cubic yard roll on roll off skip	6.1	2.44	1.4	15	1	21	25	<5 days
AREA 17	<25mm fines (inert/soil)	19 12 12 (qualifying fines and overspill from AREA 15)	Mechanically sorted by flip flow screen and density separator	Free standing inside a three-sided concrete panel storage bay	7	4	3	28	0.75	63	50 (per bay)	<72 hours
AREA 18	<25mm fines (inert/stone)	19 12 12 (qualifying stone and overspill from AREAS 15 & 24A)	Mechanically sorted by flip flow screen and density separator	Free standing inside a three-sided concrete panel storage bay	7	4	3	28	0.75	63	50 (per bay)	<72 hours
AREA 19 - 23	Hand sorted recyclables and source segregated wastes i.e. wood, plastic, metal, cardboard	15 01 03, 17 02 01, 19 12 07, 20 01 38, 17 02 03, 20 01 39, 19 12 04, 20 01 40, 17 04 07, 19 12 02, 19 12 03, 19 12 01	Hand sorted from the picking line or source segregated	Free standing inside a three-sided concrete panel storage bay	8	4	3	32	0.75	72	50 (per bay)	<72 hours

Waste storage area details												
Plan Ref	Description	EWC Code(s)	Processed / unprocessed	Containment	Max width of pile (m)	Max length of pile (m)	Max height of pile (m)	Approx. area (m2)	Conversion factor used	Approx. volume (m3)	Tonnage (approx.)	Storage duration
AREA 24A	Oversize concrete, hardcore and stone from the recycling plant	19 12 12	Sorted - end of mechanical treatment process	Free-standing against front of concrete panel wall	5	10	2	50	0.5	50	60	<72 hours
AREA 24B	Source segregated oversize concrete, hardcore and stone	17 01 01, 17 01 02, 17 01 03, 17 01 07	Unprocessed	Free-standing against front of concrete panel wall	5	12	2	60	0.5	60	72	<72 hours
AREA 25A	Non-ferrous metal (aluminium) - source segregated	15 01 04, 17 04 01, 17 04 02, 17 04 07, 20 01 40	Unprocessed	Pallet containers	1	1.2	0.85	1	1	1	1	<5 days
AREA 25B	Non-ferrous metal (aluminium) - source segregated	17 04 01, 17 04 02, 17 04 07, 19 12 03, 20 01 40	Baled	Free-standing on pallets	1	1.2	2.4	1	1	3	3	<5 days
AREA 26A - 26D	Sorted recyclable skips i.e. tyres, hard plastic, oversize scrap	16 01 03, 15 01 04, 17 04 05, 17 04 07, 20 01 40, 19 12 02	Hand sorted / unprocessed	Open topped, moveable 8 cubic yard skip	1.7	3.7	1.22	6	1	8	8	<5 days
AREA 27A - 27D	Sorted recyclable skips i.e. uPVC, oversize scrap metal, hard plastic, cardboard	17 09 04, 15 01 04, 17 04 05, 17 04 07, 20 01 40, 19 12 02, 17 02 03, 20 01 39, 15 01 01, 20 01 01	Hand sorted / unprocessed	Open topped, moveable 40 cubic yard roll on roll off skip	6.1	2.44	2.62	15	1	39	20 - 40	<5 days

#### 1.6 <u>Site Management</u>

- 1.6.1 Ultimately the site manager is responsible for the implementation of the OMP and for ensuring the mitigation strategies outlined are in place and adhered to. Where the site manager is unavailable to oversee the implementation of odour prevention and mitigation strategies, a suitably experienced site operative or the Technically Competent Manager (TCM) is delegated responsible and will act as the competent person.
- 1.6.2 The Operator, will ensure that all site operates are sufficiently trained and familiar with all site management documentation (which includes this OMP) in addition to all relevant company procedures.

# 2 Odour Risk Assessment

### 2.1 <u>Methodology</u>

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

#### 2.2 **Odour Intensity**

2.2.1 Table 2.1 – Odour IntensityTable 2.1 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 Table 2.2 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 <u>Sensitive Receptors</u>

- 2.4.1 Receptors will have a varying sensitivity to odour depending on the receptor type. It is considered human receptors will have the highest sensitivity to odour, this includes receptors within close proximity to the site <250m where people spend a significant amount of time i.e. residential dwellings, workplaces, hospitals, schools and care homes.
- 2.4.2 It is considered that receptors downwind of the site will be particularly sensitive to odour as the transfer of odours off-site occurs through the release of odour to air and subsequent atmospheric dispersal of the odour. Fugitive emissions of odour are likely to be affected by the local microclimatic conditions, in particular wind direction. Odour will be transported in the direction of the prevailing wind direction at the time of the odour occurring.
- 2.4.3 Wind speed and direction data has been obtained from Rostherne Mere weather station, located approximately 9.5km to the east of the site and are considered to be representative of the typical conditions at the site, see Figure 2.1.

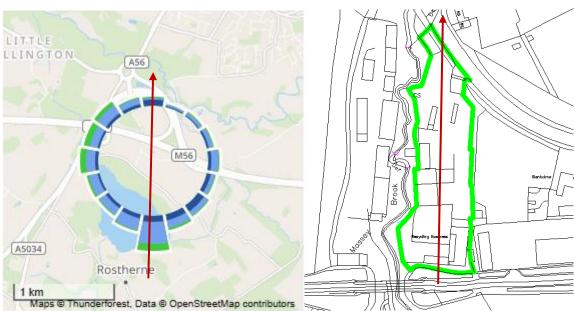


Figure 2.1 - Wind rose from Rostherne Mere weather station

2.4.4 In accordance with the wind rose data recorded daily for the period between July 2015 – October 2024, it indicates the predominant wind direction is from the south / southeast to the north / northwest.

2.4.5 A list of receptors within 1km of the site that are considered to be sensitive to odour are outlined in Table 2.3 below. A Receptor Plan has been prepared illustrating the location of all receptors within 1km of the site, see Appendix I, Drawing No. CAMS/461/04.

**Table 2.3 - Sensitive Receptors** 

Receptor	Direction from Site	Approx distance from the site boundary to the receptor boundary (m)		
Commercial / Industrial				
NRP Motor Solutions	West	15		
Scrap My Car Lymm	West	20		
Vernon Auto Repairs Lymm	West	30		
KCH Auto Repairs	West	30		
Residential				
Residential property (Stockport Road)	North	20		
Residential Property (Stockport Road)	East	70		
Care homes / hospitals				
Barchester – Cheshire Grange Care Home	East	940		
Schools				
Bright Futures School	Southeast	560		
Chaigeley School	Northwest	640		
Statham Community Primary School	Northeast	890		

- 2.4.6 It is considered the further the distance of the receptor from the site boundary the lower the risk of odour detection.
- 2.4.7 It is important to note the site has been operating in excess of 15 years and has had no history of previous complaints relating to odour.

## 2.5 Risk Matrix

2.5.1 The odour risk in any particular event can be established using the risk assessment matrix given in Table 2.4 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 Waste will be deposited in the waste transfer building to undergo sorting and separation.

  The location of the mixed waste tipping area is shown on Drawing No. CAMS/461/03.
- 3.1.2 Waste accepted consists of mixed HCI and construction and demolition waste (soil, concrete hardcore etc). Whilst these wastes are not commonly associated with odorous emissions, they can 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 Although its not frequent, 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.
- 3.1.4 The residence time of wastes stored in the tipping area mentioned above is typically less than 12 hours, no waste is stored in the tipping area outside of operational hours it is either sorted the same day or transferred to a bay or freestanding stockpile for further sorting / processing. The residence time is such that the risk of odour will be low.

### 3.2 **General Waste - Residual Wastes**

- 3.2.1 These wastes are essentially the lighter, non-recyclable fraction of the "general waste" input which is residual following treatment of wastes on site. Residual wastes will be initially stored in a bay beneath the picking line (AREA 11-14), once the bay is approaching maximum capacity, the waste is removed from site to a permitted facility.
- 3.2.2 The finer organic material will have been separated via the blower and is deposited into a dedicated bay (AREA 10) any putrescible materials (such as 'black bag' wastes) will have been identified, isolated, and rejected during the tipping and sorting process. Therefore,

these residual wastes 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 Drainage on site can be separated into the north and south, each having its own separate system. The location of the drainage divide is illustrated on Drawing No. CAMS/461/03.
- 3.3.2 Both areas of site comprise of an impermeable pad.

#### North Drainage

- 3.3.3 Drainage in the north of the site comprises of three full retention interceptors with a silt trap which is discharged to surface water (Thelwell Brook). All waste stored externally in the northern area of the site is stored in sealed containers which can have lids / covers placed over them in the event of a heavy rainfall incident to prevent water coming into contact with the waste.
- 3.3.4 All waste in the northern area of the site has been processed and separated and does not contain any mixed loads, this significantly reduces the risk of a storage area containing putrescible material all potentially odorous waste will have been removed or separated during processing.
- 3.3.5 Storage bays in the northern area are sloped towards the back of the bay so if any rainwater was to enter the bay and come into contact with the waste it would be contained in the bay.

#### **South Drainage**

3.3.6 Surface water in the south of the site is laid to fall towards a 3,000 litre underground sealed storage tank beneath the waste transfer building, comprising of a sealed drainage system.

- 3.3.7 In the event of a rainfall incident which leads to flooding on either the north or south of the site, an emergency drainage consultant would be called to the site and water pooling in the external concreted areas would be pumped from site.
- 3.3.8 Skips are provided to customers for a maximum of 14 days unless otherwise agreed with the operator. Skips which have stood on producer's sites for the maximum time may contain foul smelling water give rise to odour when tipped which will not be found until deposit in assuming the skip is sealed. It is important to note the operator does not further store these skips on site and are directly tipped into the mixed waste reception area.
- 3.3.9 Skips supplied to customers by the operator have drainage holes at the bottom to drain excess water from being held in the skip while stood at the customers property. This will reduce the amount of water when the skip is being tipped and minimise the risk of odour developing.

#### 3.4 Plasterboard/gypsum

- 3.4.1 Due to the nature of gypsum, it can react with water to produce an odorous/toxic gas, hydrogen sulphide. Also, under the waste hierarchy it is incumbent on producers/holders of controlled waste to recycle, the reaction of water with plasterboard will impact the recovery of the waste. Plasterboard arrives at the site already segregated from mixed wastes and is stored in a segregated bay within the waste transfer building between **AREA 1-5**.
- 3.4.2 Storing plasterboard within the waste transfer building significantly reduces the potential for the waste to come into contact with water producing hydrogen sulphide.
- 3.4.3 Plasterboard will typically be removed from site within 2-3 working days but will be stored for a maximum of five working days (this accounts for any delays in collections etc), minimising the potential for hydrogen sulphide developing.

#### 3.5 Wood / Green Wastes

- 3.5.1 Separated wood / green waste 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 green waste produced at the site comprises predominantly of either clean or potentially contaminated wood i.e. branches with or without leaves, tree trunks, internal doors etc. No grass cuttings, or green waste which is considered to be malodorous is accepted for treatment or processing on site.
- 3.5.2 As mentioned above in section 3.5.1 above grass cuttings harbour the greatest potential for odour due to their susceptibility to aerobic compositing and decomposition while in storage (particularly if wet). Any loads containing grass cuttings or other malodorous green or food waste would be rejected from the site or the unauthorised waste picked out and put in the quarantine area for removal to a suitably permitted site.
- 3.5.3 Separated wood considered clean as any potential contaminants will have been removed is stored in a bay within **AREA 1-5**, once the bay is full the wood is moved and temporarily stockpiled in the external yard adjacent to the 5-bay picking station while being loaded onto vehicles for collection / removal off site. This area will remain clear outside of operational hours.

## 3.6 **Processing of Waste**

- 3.6.1 The processing of waste may result in odorous emissions; however, the risk of this occurring is low due to the duration of the stored material. Table lists the main treatment operations which take place at the site and outlines the risk of odour associated with each.
- 3.6.2 Should non-conforming and potentially odorous wastes be discovered during the sorting of waste, these will be rejected in accordance with the waste rejection procedure included in the EMS.

**Table 3.1 - Waste Treatment Activities Odour Potential** 

Activity	Level of Risk	Remedial Action / Comments
Sorting (with loading shovel / 360° excavator or by hand)	Low	Waste is initially tipped within the waste transfer building prior to undergoing any mechanical treatment. The sorting of waste with a loading shovel, 360° excavator or by hand has the potential to disturb waste and release odour.  Waste is stored in the mixed waste reception area for less than 12 hours; it is considered due to the short storage time odour is unlikely to develop following tipping meaning the manual sorting of waste has a low risk of causing odour release.
Manual separation (by picking line)	Low	As above.
Screening (by using appropriate mechanical screening plant and equipment).	Low	As above.

#### 3.7 <u>Background Odour Sources in the Area</u>

- 3.7.1 There are several industrial and commercial premises situated in close proximity to the site which will all have wheelie bins and/or skips stored externally which could generate a smell if not emptied regularly. There are also numerous agricultural fields in the vicinity which may release odour due to certain fertilisers being used.
- 3.7.2 Odour release could also be the result of abnormal weather conditions, machinery breakdowns and human error.
- 3.7.3 In order to determine whether complaints are the result of activities from the site or from other nearby sites an odour complaints form will need to be completed in line with the company's complaints procedure which is attached in Appendix II.

## 4 Odour Control

#### 4.1 <u>Pre-acceptance checks</u>

- 4.1.1 Rigorous control of wastes accepted for collection to the site is required. Wastes are thoroughly inspected upon collection from a customer site.
- 4.1.2 The drivers collecting skips will be trained to identify any odorous loads in the skip. If the waste is deemed acceptable following an initial assessment, the driver will load the skip onto the wagon.
- 4.1.3 If any odorous wastes are discovered, the driver would report back to site management who would contact the customer 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 implemented on site as detailed below.
- 4.2.2 Every load will have the following details recorded at pre-acceptance:
  - a) Vehicle Registration and drivers name and signature.
  - b) Waste haulier name and valid waste carriers' registration number.
  - c) Name address (of source site) and signature of transferor.
  - d) Name, address (of destination site) and signature of the person receiving the waste (transferee).
  - e) Permit number or exemption reference of person receiving the waste (if applicable).
  - f) Description of waste including waste type, waste source, waste containment and waste quantity.
  - g) List of Waste (LoW) code.
  - h) SIC code of the waste holder.
  - i) Date and time of waste transfer and waste transfer note number.

- j) Confirmation that the waste hierarchy has been considered.
- 4.2.3 The operator predominantly uses their own vehicles to collect skips from customer sites.

  Upon collection of a load pre-acceptance checks will be undertaken (see section 4.1) the skips content will undergo an initial visual inspection to ensure that the load is acceptable.

  Following the initial inspection, if the load is deemed acceptable by the driver it will be brought to the site.
- 4.2.4 Loads will undergo a further inspection upon arrival and when being tipped at the site. Any wastes identified during these inspections which do not conform to site acceptance criteria will be rejected and removed/quarantined from loads immediately to await safe removal from site. The EA will be contacted (where necessary) if the non-conforming waste discovered is likely to lead to a breach of permit conditions.
- 4.2.5 If loads are heavily contaminated with non-conforming or malodorous waste the load will be rejected.
- 4.2.6 If small levels of contamination are noted, the waste would still be tipped, and the small amount of odorous material would be handpicked and placed in a quarantine skip. Waste is stored in the quarantine area for a maximum of five working days.
- 4.2.7 In terms of plasterboard, the operator only intends this waste as source separated material.

  If a skip is tipped with contrary items of plasterboard present, it will be subject to a more rigorous sort to pick out further items. The operator would inform the customer of a potential penalty charge to prevent a reoccurrence.

#### 4.3 Site Operations

- 4.3.1 Limiting odour release from the site can best be achieved through employing effective site management and good general housekeeping practice. It is much easier to minimise odours in the first instance rather than dealing with problems when they develop.
- 4.3.2 The next 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 rejected in line with the procedures in the EMS and Permit.
- 4.4.2 Staff undergo training to recognise 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 permitted 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.
- 4.4.3 Age of wastes the operator hires out skips to customers for a maximum of 14 days meaning that the waste received is unlikely to generate significant odorous emissions. 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 or directed to the relevant tipping area where they will be tipped immediately to prevent over storing therefore receiving wastes will not present an odour nuisance due to their storage duration.

- 4.4.5 Incoming mixed waste will then be processed sorted and processed on arrival and the site will never store more than the what the plant can process. The waste is immediately sorted to ensure that any malodorous (or potentially malodorous) wastes contained within the incoming mixed waste can be sorted and disposed of in sealed rejected waste containers. This waste would be black bin bag waste or putrescible waste left inside a skip which would not generate a lot of recyclable material.
- 4.4.6 Following deposit of a load, skips will be checked to ensure all waste has been removed from the skip. If there is any evidence of malodorous material left within the skip this will be removed to ensure there is no residual waste build up within the skip prior to storage / issue to another customer.
- 4.4.7 If residues are left within the skip that cannot be handpicked out, the skip will be manually cleaned using brushes and or hoses. It is not considered feasible to clean / wash all skips following deposit, nor will all skips be required to be cleaned.
- 4.4.8 Skips have drainage holes in the bottom, therefore any rainwater to enter the skip while on a customer site will drain out to minimise the risk of odour developing from waste sitting in stagnant water. This also applies for water used to clean skips, water will drain out the bottom into the underground storage tank in the waste transfer building.

## 4.5 **Storage of Wastes**

4.5.1 Table 4.1 below highlights the wastes accepted / stored on site with the highest potential to produce odour and the mitigation measures implemented.

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

Tuble 4.1 Waste s	
AREA 1-5	Waste stored in these bays has been processed and any potential
	contaminants removed.
Sorted wasted	Waste will be stored for less than <5 days in these bays minimising the
bays	potential for odour to develop. In the event of any extenuating
containing	circumstances i.e. breakdowns, transport failures causing the waste to
mixed waste,	exceed the 5-day storage time, the operator will increase odour monitoring
wood, green	to three times a day.
waste and	Wastes are stored within a building, providing protection from waste coming
plasterboard	into contact with water which may have the potential to produce or
	exacerbate odour release i.e. from green waste or plasterboard.
	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.
	Site operatives will all be trained to recognise odour.
	Due to the above it is considered the waste in these piles will present a very
	low risk of odour as they comprise only sorted wastes.
AREA 6	AREA 6 is used to stockpile waste prior to processing adjacent to the feed
	hopper. Waste deposited in this area will comprise of partially handpicked
Mixed waste	waste having any potential contaminants removed.
infeed pile	No food wastes are accepted at the site which are considered to be
eed pe	particularly malodorous.
	The operator implements strict waste acceptance procedures on site
	including pre-acceptance checks at a customer premises, any waste
	considered to be malodorous will not be accepted. Further information on
	the waste acceptance procedure can be found in sections 4.1 and 4.2.
	Skips are only stored at customer premises for a maximum of 14 days, the
	age of waste is considered to not be susceptible to developing odour. Waste
	is then only stored on site in <b>AREA 6</b> for a maximum of five days.
	<ul> <li>If odorous waste is identified during monitoring, the site will investigate,</li> </ul>
	find the root cause, and quarantine the odorous load in sealed containers
	which will be removed from site as soon as practicable.
	Site operatives will all be trained to recognise odour.
	<ul> <li>Due to the strict waste acceptance procedures, it is considered the waste in</li> </ul>
	this pile will present a relatively low risk of odour.
AREA 7	AREA 7 is used to store oversize non-recyclable items of waste i.e. sofas,
,,	mattresses etc.
Oversize non-	<ul> <li>Items of waste will only be stored in AREA 7 for a maximum of &lt;5 days. This</li> </ul>
recyclables	area is situated within the waste transfer building minimising the potential
recyclables	for odour development from external weather and climatic conditions.
	·
	Site operatives will all be trained to recognise odour.      Due to the strict waste assentance procedures and short storage times, it is
	Due to the strict waste acceptance procedures and short storage times, it is
	considered the waste in this pile will present a relatively low risk of odour.

bays in the waste transfer building minimising the potential for odour development from external weather and climatic conditions.  Site operatives will all be trained to recognise odour.  Due to the strict waste acceptance procedures and short storage times, it is considered the waste in this pile will present a relatively low risk of odour.  Waste in AREA 16 has been processed meaning any potentially odorous waste would have been removed or separated during treatment.  Site operatives will all be trained to recognise odour.  Due to the strict waste acceptance procedures and short storage times, it is considered the waste in this pile will present a relatively low risk of odour.  AREA 11 – 14  These bays are beneath the picking line used to store processed wastes.  Waste will be stored in the bays for less than <72 hours prior to removal or further bulking elsewhere on site.  Bays are positioned beneath an open fronted structure providing protection from external weather i.e. rain or heating from direct sunlight which will lower the risk of odour production.  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.  Site operatives will all be trained to recognise odour.  Due to the strict waste acceptance procedures and short storage times, it is considered the waste in this pile will present a relatively low risk of odour.  These bays are beneath the picking line used to store processed wastes.  Bays are positioned beneath an open fronted structure providing protection from external weather i.e. rain or heating from direct sunlight which will lower the risk of odour production.  Site operatives will all be trained to recognise odour.  Due to the fact that wastes in these bays have been processed and will not contain any contaminated material, the short storage time and the secure	AREA 9 & 10	Waste is stored in these areas for <72 hours. Both areas are situated within
<ul> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the strict waste acceptance procedures and short storage times, it is considered the waste in this pile will present a relatively low risk of odour.</li> <li>AREA 16</li> <li>Waste in AREA 16 has been processed meaning any potentially odorous waste would have been removed or separated during treatment.</li> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the strict waste acceptance procedures and short storage times, it is considered the waste in this pile will present a relatively low risk of odour.</li> <li>AREA 11 – 14</li> <li>These bays are beneath the picking line used to store processed wastes.</li> <li>Waste will be stored in the bays for less than &lt;72 hours prior to removal or further bulking elsewhere on site.</li> <li>Bays are positioned beneath an open fronted structure providing protection from external weather i.e. rain or heating from direct sunlight which will lower the risk of odour production.</li> <li>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.</li> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the fact that wastes in these bays have been processed and will not contain any contaminated material, the short storage time and the secure storage in a covered bay the risk of odour from these piles is relatively low.</li> </ul>		bays in the waste transfer building minimising the potential for odour
and residual lights (<75mm)  AREA 16  Waste in AREA 16 has been processed meaning any potentially odorous waste would have been removed or separated during treatment.  Site operatives will all be trained to recognise odour.  Due to the strict waste acceptance procedures and short storage times, it is considered the waste in this pile will present a relatively low risk of odour.  Due to the strict waste acceptance procedures and short storage times, it is considered the waste in this pile will present a relatively low risk of odour.  AREA 11 – 14  These bays are beneath the picking line used to store processed wastes.  Waste will be stored in the bays for less than <72 hours prior to removal or further bulking elsewhere on site.  Bays are positioned beneath an open fronted structure providing protection from external weather i.e. rain or heating from direct sunlight which will lower the risk of odour production.  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.  Site operatives will all be trained to recognise odour.  Due to the fact that wastes in these bays have been processed and will not contain any contaminated material, the short storage time and the secure storage in a covered bay the risk of odour from these piles is relatively low.	<75mm	development from external weather and climatic conditions.
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<ul> <li>Waste in AREA 16 has been processed meaning any potentially odorous waste would have been removed or separated during treatment.</li> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the strict waste acceptance procedures and short storage times, it is considered the waste in this pile will present a relatively low risk of odour.</li> <li>AREA 11 – 14</li> <li>These bays are beneath the picking line used to store processed wastes.</li> <li>Waste will be stored in the bays for less than &lt;72 hours prior to removal or further bulking elsewhere on site.</li> <li>Bays are positioned beneath an open fronted structure providing protection from external weather i.e. rain or heating from direct sunlight which will lower the risk of odour production.</li> <li>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.</li> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the fact that wastes in these bays have been processed and will not contain any contaminated material, the short storage time and the secure storage in a covered bay the risk of odour from these piles is relatively low.</li> </ul>	and residual	Due to the strict waste acceptance procedures and short storage times, it is
<ul> <li>waste would have been removed or separated during treatment.</li> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the strict waste acceptance procedures and short storage times, it is considered the waste in this pile will present a relatively low risk of odour.</li> <li>AREA 11 – 14</li> <li>These bays are beneath the picking line used to store processed wastes.</li> <li>Waste will be stored in the bays for less than &lt;72 hours prior to removal or further bulking elsewhere on site.</li> <li>Bays are positioned beneath an open fronted structure providing protection from external weather i.e. rain or heating from direct sunlight which will lower the risk of odour production.</li> <li>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.</li> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the fact that wastes in these bays have been processed and will not contain any contaminated material, the short storage time and the secure storage in a covered bay the risk of odour from these piles is relatively low.</li> </ul>	lights (<75mm)	considered the waste in this pile will present a relatively low risk of odour.
<ul> <li>&lt;25mm fines (non-inert/lights)</li> <li>Due to the strict waste acceptance procedures and short storage times, it is considered the waste in this pile will present a relatively low risk of odour.</li> <li>AREA 11 – 14</li> <li>These bays are beneath the picking line used to store processed wastes.</li> <li>Waste will be stored in the bays for less than &lt;72 hours prior to removal or further bulking elsewhere on site.</li> <li>Bays are positioned beneath an open fronted structure providing protection from external weather i.e. rain or heating from direct sunlight which will lower the risk of odour production.</li> <li>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.</li> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the fact that wastes in these bays have been processed and will not contain any contaminated material, the short storage time and the secure storage in a covered bay the risk of odour from these piles is relatively low.</li> </ul>	AREA 16	Waste in AREA 16 has been processed meaning any potentially odorous
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<ul> <li>AREA 11 – 14</li> <li>These bays are beneath the picking line used to store processed wastes.</li> <li>Waste will be stored in the bays for less than &lt;72 hours prior to removal or further bulking elsewhere on site.</li> <li>Bays are positioned beneath an open fronted structure providing protection from external weather i.e. rain or heating from direct sunlight which will lower the risk of odour production.</li> <li>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.</li> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the fact that wastes in these bays have been processed and will not contain any contaminated material, the short storage time and the secure storage in a covered bay the risk of odour from these piles is relatively low.</li> </ul>	(non-	Due to the strict waste acceptance procedures and short storage times, it is
<ul> <li>Waste will be stored in the bays for less than &lt;72 hours prior to removal or further bulking elsewhere on site.</li> <li>Bays are positioned beneath an open fronted structure providing protection from external weather i.e. rain or heating from direct sunlight which will lower the risk of odour production.</li> <li>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.</li> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the fact that wastes in these bays have been processed and will not contain any contaminated material, the short storage time and the secure storage in a covered bay the risk of odour from these piles is relatively low.</li> </ul>	inert/lights)	considered the waste in this pile will present a relatively low risk of odour.
<ul> <li>Hand sorted recyclables i.e. wood, plastic, residual waste, cardboard etc.</li> <li>Hand sorted recyclables i.e. wood, plastic, residual waste, cardboard etc.</li> <li>Hand sorted recyclables and source segregated wastes i.e. wood, plastic, metal, cardboard</li> </ul>	AREA 11 – 14	These bays are beneath the picking line used to store processed wastes.
<ul> <li>Bays are positioned beneath an open fronted structure providing protection from external weather i.e. rain or heating from direct sunlight which will lower the risk of odour production.</li> <li>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.</li> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the fact that wastes in these bays have been processed and will not contain any contaminated material, the short storage time and the secure storage in a covered bay the risk of odour from these piles is relatively low.</li> </ul>		Waste will be stored in the bays for less than <72 hours prior to removal or
<ul> <li>wood, plastic, residual waste, cardboard etc.</li> <li>AREA 19 – 23</li> <li>Hand sorted recyclables and source segregated wastes i.e. wood, plastic, metal, cardboard</li> <li>from external weather i.e. rain or heating from direct sunlight which will lower the risk of odour production.</li> <li>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.</li> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the fact that wastes in these bays have been processed and will not contain any contaminated material, the short storage time and the secure storage in a covered bay the risk of odour from these piles is relatively low.</li> </ul>	Hand sorted	further bulking elsewhere on site.
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<ul> <li>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.</li> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the fact that wastes in these bays have been processed and will not contain any contaminated material, the short storage time and the secure storage in a covered bay the risk of odour from these piles is relatively low.</li> </ul>	•	9
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<ul> <li>which will be removed from site as soon as practicable.</li> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the fact that wastes in these bays have been processed and will not contain any contaminated material, the short storage time and the secure storage in a covered bay the risk of odour from these piles is relatively low.</li> <li>wood, plastic, metal, cardboard</li> </ul>	cardboard etc.	
<ul> <li>Site operatives will all be trained to recognise odour.</li> <li>Due to the fact that wastes in these bays have been processed and will not contain any contaminated material, the short storage time and the secure storage in a covered bay the risk of odour from these piles is relatively low.</li> <li>wood, plastic, metal, cardboard</li> </ul>		
<ul> <li>Due to the fact that wastes in these bays have been processed and will not contain any contaminated material, the short storage time and the secure storage in a covered bay the risk of odour from these piles is relatively low.</li> <li>wood, plastic, metal, cardboard</li> </ul>	AREA 19 – 23	
recyclables and source segregated wastes i.e. wood, plastic, metal, cardboard  contain any contaminated material, the short storage time and the secure storage in a covered bay the risk of odour from these piles is relatively low.	Hand corted	,
and source segregated wastes i.e. wood, plastic, metal, cardboard		· · · · · · · · · · · · · · · · · · ·
segregated wastes i.e. wood, plastic, metal, cardboard	-	,
wastes i.e. wood, plastic, metal, cardboard		storage in a covered day the risk of odour from these piles is relatively low.
wood, plastic, metal, cardboard		
metal, cardboard		
cardboard	•	
•		
		•

#### 4.6 Loading and Transport of General Wastes

4.6.1 In all cases, the drop heights of mixed waste will be kept to a 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) will be carried out using mobile plant and water supplies to discourage odour generation from residual wastes. Other than the use of a road sweeper which may be used to remove finer particles, all mobile plant is available to the site. Additional plant can be sourced instantaneously from the surrounding industrial estate. The odorous materials will then be placed in a sealed rejected waste skip. This skip will be removed/emptied 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 the impermeable pad. In the event that there are any issues such as cracks in the pad causing waste to become trapped and odour developing, maintenance works will be carried out within 48 hours.
- 4.7.3 A housekeeping schedule has been produced overleaf 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.
  - a) Avoid fugitive odorous emissions through good housekeeping.
  - b) Maintain a clean, well-organised site.
  - c) Jet spray and disinfect storage bays once per week.
  - d) Clean equipment that has been in contact with odorous materials.

- e) Carry out a deep clean of the waste transfer building including the waste reception area and storage containers / bays once a quarter and record this in the site diary.
- f) Concrete floors draining appropriately, and slopes / catchments pits are functioning.
- g) Floors are sealed to prevent absorption and adsorption of odour producing residues.
- h) 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.
- i) Periodically treat drainage systems with bacteria-inhibiting solution

#### 4.8 Site Infrastructure

- 4.8.1 The site deploys the following measures ensuring odours do not escape beyond the site boundary.
  - Monitoring The site will carry out Olfactory/Sniff assessments which have been outlined further in Section 5 of this OMP.
  - Stock rotation All potentially odorous wastes stored on site are within skips or storage
    bays which 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 odorous wastes are contained within skips or storage bays. Any
    wastes with the potential to cause odour will not be stored for longer than usually 48
    hours and 5 days only in extenuating circumstances ensuring that wastes are not left to
    stagnate.

#### 4.9 Liaison with Neighbours

- 4.9.1 In the event of significant but temporary odour releases outside normal operations, immediate neighbours within 200m will be contacted via phone call or face to face to advise them of the situation and the action being taken. The EA will also be notified by a telephone call or email to the inspecting officer, or this person is on leave, the local area team.
- 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 the operator who are involved with storage and handling of potentially odorous materials will receive sniff test training (including office/admin workers allocated to undertake the Sniff test) and complaint reporting (management and operations staff). Site management comprising the director/TCM/site manager will be responsible for delivering the training to employees within the company.
- 4.10.2 A full test (drill) of the procedures in this document will be carried out every 12 months to test that the plan works. The first test will take place within one month of the agreement of this document with the EA. The outcome and any follow up training for staff will be documented in the site diary and relevant forms in the EMS and this OMP. The OMP checklist will also be used during the drill. Site management will be responsible for completing the drill.

# 5 Monitoring

#### 5.1 Monitoring Odorous Releases

- 5.1.1 The operator has identified the following process trigger levels which could result in an odour release at the site:
  - The waste reception and sorting area being at capacity resulting in skips not being tipped and stored for longer than necessary.
  - ii) The storage bays / skips being full or no 1.0m freeboard being present on bays.
  - iii) Plant/machinery breakdowns resulting in the inability to sort/process waste efficiently and being stored longer than necessary. This could also lead to excessive fumes or leakages of diesel / oil.
  - iv) Standing surface water caused by either a blockage in the drainage system or arising from a heavy rainfall event.
  - v) High winds i.e. >35mph in the direction to the nearest residential receptors
  - vi) Staff illness, negligence or no shows meaning waste acceptance is failing, waste is not being processed as it should be, and housekeeping/daily checks may reduce or not taking place.
  - vii) Transport failures leading to excessive storage of waste and for longer than necessary.
  - viii) Drought/warm periods which causes the waste to stagnate and produce odour.
- 5.1.2 If any of the above trigger levels are experienced on site, the site manager can choose to cease operations until operations / odour is under control.
- 5.1.3 On-site –It is considered at least one staff member would be able to detect if any odour is present on site, this would be usually office staff who are not continually exposed. If a non-operational staff member identifies an odour, they will report this to site management and then the procedure shown in section 5.5 will be followed. This would ensure the odour problem can be investigated on site prior to a potential odour complaint.

- 5.1.4 In the event of one of the scenarios in shown in Section 5.1.1 occurs on site, site management will carry out odour management monitoring immediately using the procedures shown in the next sections of this OMP.
- 5.1.5 The operator 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 Odour Monitoring

- 5.2.1 Sniff testing will be carried out weekly or as necessary (i.e., increased regularity should the management have reason to suspect odorous emissions from the site). Sniff testing will be carried out both routinely, to ensure odour is under control, and in response to specific complaints.
- 5.2.2 Continuous monitoring will be undertaken by site operatives while undertaking their regular duties on site. This continuous monitoring is not recorded unless in the event of an odour emission being detected.
- 5.2.3 It is not considered necessary to have fixed odour monitoring points due to infrequent weather conditions. Monitoring will be completed with due regard of meteorological conditions on the day, forecasted conditions, potential odour sources and the location of sensitive receptors. Extreme weather conditions (high winds, increased temperatures etc) may affect potential odour pathways and increase odour emissions. Therefore, weather conditions will also be recorded as part of the monitoring.
- 5.2.4 The results of monitoring exercises and any remedial action taken will be entered into the site diary or daily inspection form, see EMS Appendix II, 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.

- 5.2.5 Should the monitoring conclude that a certain activity/waste is giving rise to odour, which is migrating offsite, steps will be made to reduce the impact of this activity, which may include, but is not limited to; removal offsite to a suitably permitted facility, faster processing/lower storage rates, pumping and removal of standing surface water, removal of waste to a more suitable area of the site etc.
- 5.2.6 Should odour controls fail, the site manager may make the decision to cease the acceptance of further wastes until the odorous material is taken off site for disposal at a suitably permitted facility.
- 5.2.7 Should the failure be identified due to a procedure failure, the OMP will be reviewed and updated to account for any necessary changes.

### **5.3** Monitoring Procedure

- 5.3.1 To prevent odour adoption (or odour 'fatigue'), a suitably trained member of staff will undertake monitoring at the beginning of the working day. Monitoring will be carried out immediately upon arrival to the site at locations dependent on the climatic conditions and receptor locations.
- 5.3.2 The assessor will ensure they do 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 If multiple monitoring is required to be undertaken within the middle of the working day. Prior to carrying out the odour check, the relevant member of staff will vacate the site for a period of 30 minutes (in addition to 5.3.2 above) and then carry out the assessment on their return to ensure they are not desensitised to the odour.

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

# 5.4 Process Monitoring

- 5.4.1 Process monitoring will be undertaken by site operatives to ensure procedures are being carried out effectively.
- 5.4.2 Following removal of waste from a bay a visual inspection of the bay will be undertaken to ensure all material has been removed before refilling. This ensures no residual material is left behind that could develop odour from being stored in excess of the limits stated in Table 1.2.
- 5.4.3 To ensure the site doesn't reach capacity and is unable to accept further waste loads, visual monitoring will be undertaken of storage bays. If it is evident multiple bays are full or near full and have not been emptied this indicates the site is nearing full capacity and the operator will arrange for waste to be removed or delay acceptance of loads until there is sufficient capacity available.

# 5.5 <u>Complaints Monitoring/Procedure</u>

- 5.5.1 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.
- 5.5.2 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.

# **5.6** Odour Diaries

5.6.1 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 <u>Contingencies and Emergency Plans</u>

- 6.1.1 In accordance with the EA's guidance on OMPs, the operator will develop contingency plans 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'. Odours will be based on a 1 5 scoring scheme as shown below and also in the odour diary shown in Appendix II:
  - 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)
- 6.1.2 If odours based on 3-5 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.
  - 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 Table 6.1 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.

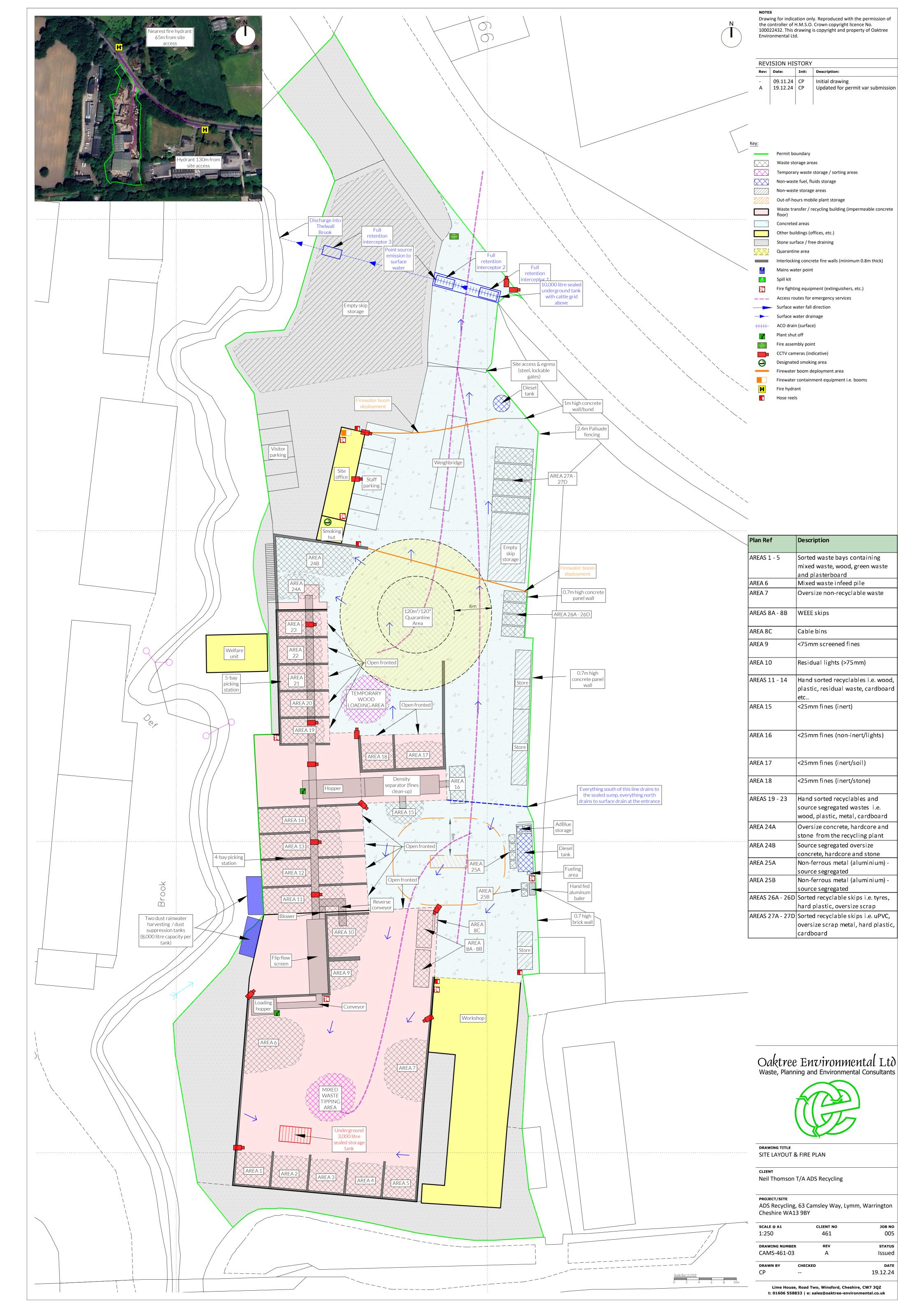
# 6.4 Weather Conditions / Emergency Situations

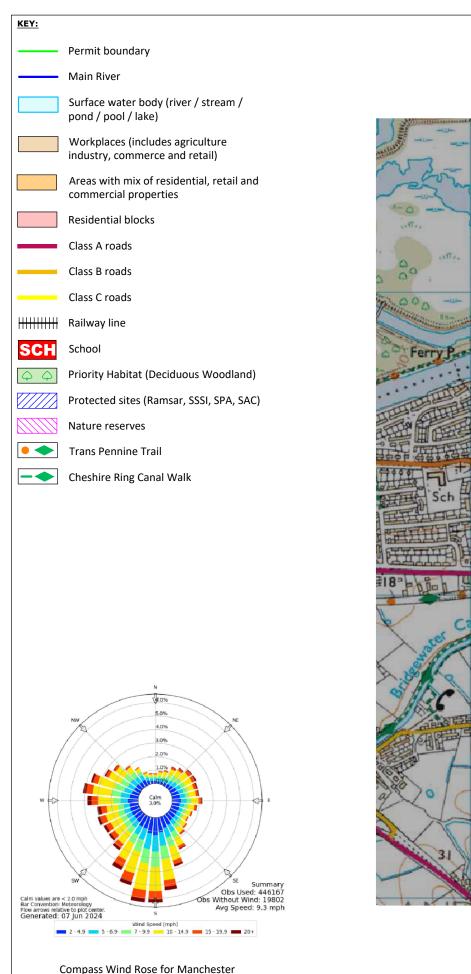
- 6.4.1 The operator will set up a notification alert system with the Met Office to receive updated weather information for the following weather conditions which could cause a potential on or off-site odour issue:
  - a) High winds >45mph which could exaggerate an odour.
  - b) Droughts or periods of hot weather exceeding 3 major dry days which could lead to water shortages, hosepipe bans and excessive odour.
  - c) Flooding.
- 6.4.2 The operator would install the following preventative/contingency measures at the site (in addition to control measures in Section 4) to avoid serious odour issues as a result of the above weather conditions or fire incident:
  - a) Stockpiles or containers containing any odorous waste may be covered with tarpaulin in the event ongoing procedures are not considered effective.
  - b) Contact an additional haulier to help remove the waste on site.
  - c) Suspend any further waste deliveries to the site.
  - d) Contact the EA to agree a suitable course of action
  - e) 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

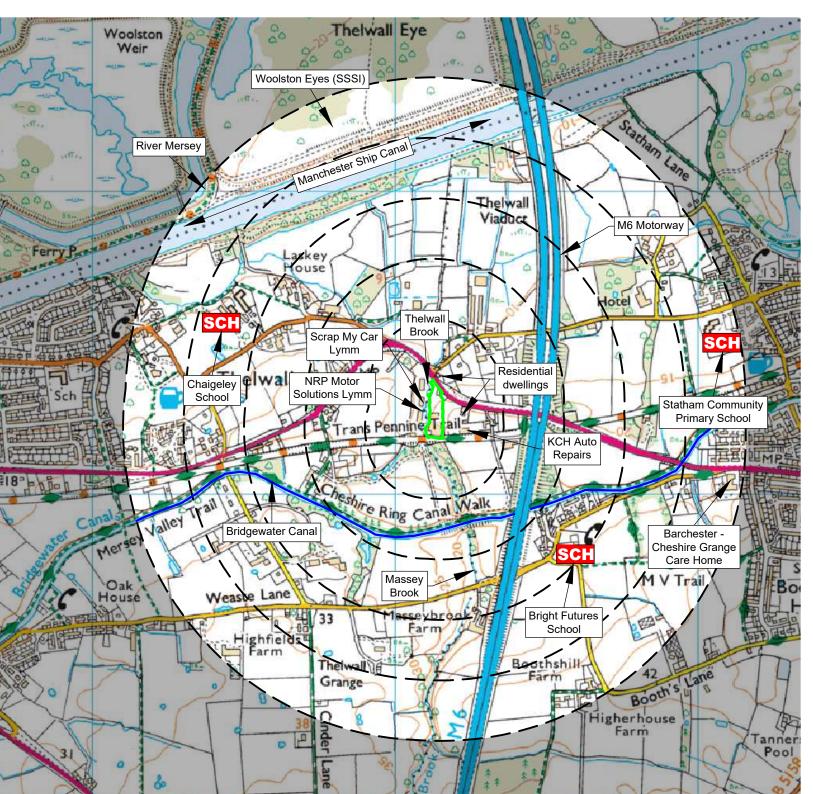
- 6.5.1 The site manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures, which result in the closure of the site, will be recorded in the site diary.
- 6.5.2 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 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.

# Appendix I Drawings





International Airport (EGCC) Period 1973-2024
- source: Iowa State University



NOTES

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

Drawing for indication only. Reproduced with the permission of the controller of H.M.S.O. Crown copyright licence No. 100022432. This drawing is copyright and property of Oaktree Environmental Ltd.

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TREVISION THIS TOTAL				
	Rev:	Date:	Init:	Description:
	-	19.12.24	EG	Initial drawing

TITLE:

RECEPTOR PLAN

CLIENT:

Neil Thomson T/A ADS Recycling

ROJECT/SITE

ADS Recycling, 63 Camsley Way, Lymm, Warrington, Cheshire, WA13 9BY

SCALE @ A3:	CLIENT NO:	JOB NO:
1:12,500	461	005
,		
DRAWING NO:	REV:	STATUS:
CAMS-461-04	-	Issued
DATE:	DRAWN:	CHECKED:
19.12.24	EG	CP



# Appendix II Record Forms

Odour Diary				
Address:				
	Address:	Address:		

#### **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)

# NEIL THOMSON T/A ADS RECYCLING COMPLAINTS REPORT FORM

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 the complaints form. 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.