# ODOUR MANAGEMENT PLAN

Gerrard Place, Skelmersdale WN8 9SU

**W L Polymer Ltd**

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|---|---|---|---|---|---|
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# 1 Introduction

## 1.1 General

1.1.1 Oaktree Environmental Ltd has been instructed by W L Polymer Ltd to prepare an Odour Management Plan ("OMP") for their facility at Gerrard Place, Skelmersdale WN8 9SU. Environmental Permit No. will be EPR/AP3224SZ and site will be operated as a physical treatment facility comprising the acceptance storage and treatment of non-hazardous waste comprising predominantly plastic. Recycled product arising from the above treatment process will comprise plastic film and agglomerate which would be exported as a product for onward manufacturing; and, plastic pellet which will typically be sold domestically for re-use.

1.1.2 Other wastes such as metal, paper/card labels, sorted and mixed packaging, mixed co-mingled and dry mixed recyclables may also be accepted at the site but only for bulking and transfer and no physical treatment.

1.1.3 The site is also operated in accordance with an Environmental Management System (EMS) and Fire Prevention Plan (FPP) along with other documents targeted to specific environmental considerations including this OMP.

1.1.4 This OMP will be kept in the site office and all staff will be trained in the contents of the document which will allow W L Polymer Ltd and its employees 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.

1.1.5 This OMP has been prepared to meet the requirements of The Environmental Permitting (England and Wales) Regulations 2016 and the Environment Agency's Guidance: "*Develop a management system: environmental permits*" published 01/02/2016 (updated 04/08/2021 and "*H4 odour management*" published 04/04/2011.

## 1.2 Site Location

1.2.1 The site is located on Land at Gerrard Place, Skelmersdale WN8 9SU. The national grid reference for the site is SD 47733 05350.

## 1.3 Hours of operation

1.3.1 The site will operate on a 24/7 basis comprising two 12-hour shift patterns. A breakdown of the operating hours is as follows:

- Waste acceptance and removal = 24/7
- Waste processing = 24/7
- Plant maintenance and full site housekeeping comprising manually cleaning processing plant inside the Units = Continuous throughout operations

1.3.2 As the site is run on a 24/7 basis, there are two separate shift patterns which are 06:00 – 18:00 and 18:00 – 06:00.

## 1.4 Reviewing and monitoring this OMP

1.4.1 This document will be due for review two years from the date of approval, or, as a result of any incidents which may lead to the requirement for immediate review or the OMP guidance changing, whichever is the sooner. The circumstances which would warrant a review are the following:

- Experiencing an odour incident
- Additional odorous waste streams accepted on site.
- Increase waste volumes accepted and stored.
- Development of site infrastructure – new buildings.
- Installation of new equipment or plant – baler/loading shovel/sort-line/ etc.

1.4.2 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 Drawing No. GPL/3329/03 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 majority of wastes will be accepted under the following EWC codes and tipped into the following areas on site:

- 15 01 01 – plastic packaging (**ALL AREAS**)
- 19 12 04 – plastics **ALL AREAS**)
- 20 03 01 – co mingled dry mixed recyclables - (**AREAS 1 - 4**)
- Other wastes shown below would also be tipped and stored in external areas of the site awaiting processing.

1.5.5 The table overleaf details a summary of the main wastes types which are accepted on and stored on a daily basis at the site, the rows highlighted in in red are considered to be those wastes which have the potential to cause odour.

**Table 1.1 – Storage Table Details (Odorous wastes)**

| 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) | Maximum storage durations | Comments |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| AREAS 1 - 4 | Bays for unloading mixed waste streams for sorting and separation (waste may also contain as shown in AREAS 5-7) | Mixture of 15 01 01, 15 01 02, 15 01 06, 15 01 07, 19 12 02, 19 12 03, 19 12 04, 19 12 12, 20 01 01, 20 01 39, 20 03 01 | Waste could be baled or loose | Concrete panel & concrete interlocking block fire walls | 4 / 0.3 & 0.8 | 20 | 7 | 3 | 140 | 1 | 420 | <31 days | Any wastes which could give rise to odour would be removed within 48 hours |
| AREAS 4 - 7 | Bays for unloading mixed plastic prior to treatment (waste may also contain as shown in AREAS 1-4)) | The above codes | Waste could be baled or loose | As above | 4 | 20 | 7 | 3 | 140 | 1 | 420 | <8 weeks | Any wastes which could give rise to odour would be removed within 48 hours |
| AREA 8 | Pre-processing | 15 01 02, 19 12 04 | Waste could be baled or loose | As above | 4 | 8 | 6 | 3 | 48 | 1 | 144 | <24 hours | Area will continually load wastes into the pre-treatment area inside the building |
| AREA 9 | Mixture of baled material and product storage | 19 12 04 | Baled / processed | Concrete panel fire wall of building | 6 | 5 | 5 | 3 | 25 | 1 | 75 | <8 weeks | This area will only store waste in the event the baler is used because the wash & extrusion plants have been decommissioned |
| AREA 10 | Mixture of baled material and product storage | 19 12 04 | Baled / processed | Concrete panel fire wall of building | 6 | 5 | 8 | 3 | 40 | 1 | 120 | <8 weeks | As above |

1.5.6 Prior to arranging a waste delivery at the site, the operator will request confirmation of the contents to be placed in the delivery vehicle carrying the waste 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 wastes which have the potential to cause 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 04 | waste plastics | Medium |
| **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 03 | wooden packaging | Low |
| 15 01 04 | metallic packaging | Medium |
| 15 01 06 | mixed packaging | High |
| 15 01 07 | glass packaging | Medium |
| **15 02** | **absorbents, filter materials, wiping cloths and protective clothing** | |
| **17** | **CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)** | |
| **17 02** | **wood, glass and plastic** | |
| 17 02 03 | plastic | Medium |
| **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** | |

| EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC | | Odour potential - |
|---|---|---|
| **CODE** | **WASTE TYPE** | |
| 19 12 01 | paper and cardboard | Medium |
| 19 12 02 | ferrous metal (baled cans only) | |
| 19 12 03 | non-ferrous metal (baled cans only) | |
| 19 12 04 | plastic and rubber | Medium |
| 19 12 12 | co-mingled dry mixed recyclable wastes | 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 39 | plastics | Medium |
| **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 is responsible for the general management of the site including the acceptance and handling of any wastes with the potential to cause odour.

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. GPL/3329/04.

## 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 centre of site (m) |
|---|---|---|
| North | Residential and small retail properties including workplaces off Wolverton | 480 |
| East | Residential and small retail properties including workplaces off Glebe Road | 428 |

2.5.2 Other receptors not shown in the above table are illustrated on Drawing No. GPL/3329/04 but adjacent users of the industrial estate could be affected by any potential odour release.

## 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 This waste would be stored within AREA**S 1 - 8** on Drawing No. GPL/3329/03 comprising waste which has just been tipped.

3.1.2 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 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 arising from the waste treatment process. This material is likely to contain the waste wash water with residual items. This would be stored in containers adjacent to the exit points of the plant. The site will not look to accept any householder/black bin bag items so the residual wastes on site 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 areas are separately sealed.

3.3.2 In the event of a rainfall incident which leads to flooding, 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. It is important to note the site would not look to accept this material onto the site.

## 3.4 Green wastes

3.4.1 The site will not be accepting any green waste.

## 3.5 Plasterboard/gypsum

3.5.1 The site will not be accepting any plasterboard.

## 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 as the site will only be processing plastic packaging waste which is suitable for claiming package recovery notes (PRNs). This waste has very little odour potential given the waste accepted is usually pre-arranged and an audit will have taken place at the site of production so they are aware of the standards of the input material required.

3.6.2 The site will not to look to process any other types of waste at the site.

## 3.7 Background Odour Sources in the Area

3.7.1 Other potentially odour emitting operators, sites or areas are tabulated below in the table below.

**Table 3.1 - Other Odour Generating Operators**

| Company | Address | Type of Business | Approximate distance & location from site boundary (m) |
|---|---|---|---|
| Hills Salvage & Recycling Ltd | Gerrard Place, Skelmersdale WN8 9SU | Waste Recycling Facility | Adjacent / west |
| White Moss Landfill Ltd | White Moss Rd S, Skelmersdale WN8 9TH | Waste landfill Facility | 465 / west |

3.7.2 There are also several industry and commercial premises situated on the surrounding industrial estate 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.

3.7.3 Odour release could also be the result of abnormal weather conditions, machinery breakdowns and human error.

3.7.4 In order to determine whether complaints are the result of activities from the site or from other nearby sites an odour complaints form will need to be completed in line with the company's complaints procedure which is attached in Appendix II.

# 4 Odour control

## 4.1 Pre-acceptance checks

4.1.1 The driver collecting the waste being delivered to the site will be trained (by site management) to identify any loads which have the potential to cause odour. If any odour release is present during the collection, the driver would report back to site management who would contact the customer who would need to declare the contents of the wastes being removed from their site. Site management would then take the decision to reject the waste depending on the outcome of the enquiry with the producer 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 Once a load has been tipped, it will undergo a further visual inspection and if the load is found to have contained levels of odour which are likely to escape off site, the load will be loaded back onto the delivery vehicle and and returned to source. As mentione din the

section above, the likelihood of this occurring from the operator's own drivers would be low but could apply to third party loads being delivered. If small levels of contamination are present, these would be noted in the site diary so feedback could be provided to the producer site and the waste would still be tipped. The waste giving rise to the odour would be handpicked placed in a sealed, covered quarantine skip and removed from site within 48 hours.

## 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 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 (stored too long) rejected in line with the procedures in the EMS and EP. Trained competent staff are in place 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 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 **Age of wastes** - W L Polymer Ltd maybe receiving waste from third party waste facilities so waste could have stored at the producer for longer than necessary. The procedures shown

in the above would however limit any wastes with significant odour potential being accepted. Significant meaning odour being realised from the site which could lead to complaints or from following inspections for odour potential.

## 4.5 Storage of Wastes

4.5.1 The site may store the following wastes shown in Section 1.5 which could be regarded as those which could present odour issues at the site .The table below details how accepting and storing these wastes would reduce any potential odour release from the site.

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

| | |
|---|---|
| AREAS 1 - 4<br><br>Bays for unloading mixed waste streams for sorting and separation (waste may also contain as shown in AREAS 5-7)<br><br>AREAS 5 -7<br><br>Bays for unloading mixed plastic prior to treatment (waste may also contain as shown in AREAS 1-4) | • In terms of AREAS 1 – 4, these are external storage bays which store wastes which will have been delivered to the site pre-separated or as a mixture of waste types which the site can accept on the permit. AREAS 5 -8 will be feedstock for the plastic treatment plants inside the building. The contents in the bays may vary depending on demand for material i.e. all bays could store plastic and AREAS 1 -6 may have other wastes stored in them.<br>• The waste in these stockpiles will be removed from the curtain sided trailer or HGV into the bay where they will be sorted in the relevant waste stream. The waste will then be bulked and removed from site.<br>• The waste will be placed at right hand side of the stockpile and extracted from the left in an anti-clockwise formation ensuring the first in first out principle will applies. The stockpiles are therefore dynamic<br>• The site will not aim to store these wastes for longer than a couple of weeks but 8 weeks has been provided to cover a worst-case scenario in the event of a breakdown, plant malfunction or let down of collection/removal by third party.<br>• 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.<br>• Within this area, operatives would separate the waste into streams and place them in individual bays allowing for easier onward transportation. will continue to be stored and processed inside the building.<br>• If odour is detected in the waste during daily monitoring, the site will investigate, find the root cause and quarantine the wastes giving rise to odour in sealed, covered containers which will be removed from site within 48 hours. |

4.5.2 In summary, the wastes being accepted have the potential to cause given their EWC code but strict acceptance procedures proposed by the operator would eliminate loads with significant odour potential being accepted initially.

4.5.3 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. On most occasions, the waste in these stockpiles will be removed from the curtain sided trailer or HGV into the bay where they will be sorted in the relevant waste stream therefore reducing any drop height. 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 roads, drainage channels and holding tank will be carried out using mobile plant and water supplies to discourage odour generation from old degrading materials. Additional plant can be sourced instantaneously from the surrounding industrial estate or a contract set up to with other sites to clean the site more thoroughly if required i.e. by using a road sweeper. The odorous materials collected will then be placed in a sealed, covered skip, stored in the quarataine area and 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 building on a quarterly basis. In the event that there are any issues resulting in odour escaping from the building then 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.

- Avoid fugitive odorous emissions through good housekeeping
- Maintain a clean, well-organised site
- Jet spray storage bays daily
- Jet spray and disinfect storage bays once per week
- Clean equipment that has been in contact with odorous materials
- Carry out a deep clean of the reception / processing building and storage bays once a quarter and record this in the site diary
- Concrete floors draining appropriately and slopes / catchments pits are functioning
- Floors are 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 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 giving rise to odour will not be stored for longer than usually 48 hours.

4.8.2 Site management will visually monitor the baler and covered area on a daily basis and will carry out quarterly monitoring of the storage bays to ensure their integrity is suitable. In the event that there are any issues, the bays and covered structure will undergo maintenance/repair works within 48 hours.

## 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 of W L Polymer Ltd 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 foreman/site manager will be responsible for delivering the training to employees within the company.

4.10.2 Training will be given to employees of W L Polymer Ltd by site management i.e. director/TCM/site foreman/site manager ensuring all employees 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 A full test (drill) of the procedures in this document will be carried out every 6 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 responsible for completing the drill.

# 5 Monitoring

## 5.1 Monitoring Odorous Releases

5.1.1 The site has identified the following process trigger levels which could result in an odour release at the site

i) AREAS 1 – 8 being at capacity resulting in skips not being tipped and stored for longer than necessary
ii) The storage bays being full or no 0.5m- 1.0m freeboard being present
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. exceeding 7 on the Beaufort scale (over 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 smell

5.1.2 **On-site** – There will be up to 15 members of staff working at the site, it is considered at least one of these staff members would be able to detect if any odour is present on site, this would be usually office staff who are not continually exposed. If a non-operational staff member identifies an odour, they will report this to site management and then the procedure shown in section 5.2.3 will be followed. This would ensure the odour problem can be investigated on site prior to a potential odour complaint.

5.1.3 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.

5.1.4 W L Polymer 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 at least twice 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.). It is not considered necessary to have fixed odour monitoring points due to infrequent weather conditions. If there is an easterly or westerly wind, the staff member carrying out the monitoring will observe the area from the north or south so dust can be easily identified. The site staff member will complete the monitoring and form in Appendix II at least once every 12 hours or in the event of the circumstances shown in Section 5.1.1 immediately then every 3 hours afterwards. The monitoring will be carried out will while the site is operational and should it be observed if odour is being released, the staff member will radio site management who will find the odour release and rectify the problem immediately.

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 which is migrating offsite, steps will be made to reduce the impact of this activity, which may include, but is not limited to; removal offsite to a suitably permitted facility, faster processing/lower storage rates, pumping and removal of standing surface water, removal of waste to a more suitable area of the site etc.

5.2.4 The site supervisor will be suitably trained to carry out these duties. 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 (at least twice) 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, 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.

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 >45mph 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 may be covered with tarpaulin in the event ongoing procedures are not considered effective.
- 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.

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 WLP/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 EA for approval before implementation. It may also be revised upon request from EA, should the permit be varied, transferred etc.

# Appendix I

# Drawings


**NOTES**

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.

## REVISION HISTORY

| Rev: | Date: | Init: | Description: |
|---|---|---|---|
| - | 17.11.23 | CP | initial drawing |
| A | 21.11.23 | CP | Operator comments |

Key:

- Permit boundary
- Combustible waste storage areas
- Temporary storage/loading areas
- Product storage non-waste
- Waste recycling buildings
- Concreted areas
- Other buildings (offices, etc.)
- Stone surface / free draining
- Landscaped/grass areas
- Location of fixed plant (indicative)
- Mains water point & hoses
- Spill kit
- Fire fighting equipment (extinguishers, etc.)
- Fire water containment equipment i.e. booms, drain mats, drain plugs etc..
- Access routes for emergency vehicles and site plant manoeuvring areas
- Fire alarm
- Surface water fall direction
- Foul water drainage (potentially contaminated)
- Surface water drainage (clean)
- Surface gullies
- Foul/surface manholes
- Plant / electrical shut off
- Fire assembly point
- Fire door
- CCTV cameras (indicative locations)
- Infrared/heat detection cameras (indicative locations)
- 0.8m wide concrete interlocking block fire wall
- 0.3m - 0.6m wide concrete panel fire wall
- Fire suppression system sprinklers (indicative locations)

## EREMA Extrusion plant references

| Ref: | Description: |
|---|---|
| 1 | Bag fill unit |
| 2 | Pellet drying centrifuge |
| 3 | Pellet transport system |
| 4 | Pellet dewatering system |
| 5 | Water pump station |
| 6 | Hot die face pelletiser |
| 7 | EREMA Backflush filter |
| 8 | Water system for vacuum pump |
| 9 | EREMA Laserfilter |
| 10 | Powered exhaust sytem |
| 11 | Control cabinet |
| 12 | INTAREME process combination |
| 13 | Belt conveyor |
| 14 | Maintenance platform |

## Wash Plant references

| Ref: | Description: |
|---|---|
| 1 | Twin rotor shredder |
| 2 | Conveyor |
| 3 | Float sink tank |
| 4 | Centrifuge / dewater & clean |
| 5 | Granulator |
| 6 | Auger feed |
| 7 & 8 | Flat sink tanks |
| 9 | Centrifuge / dewater & clean |
| 10 | Float sink tank |
| 11 | Centrifuge / dewater & clean |
| 12 | Manifold & conveyors x 3 |
| 13 | 3 x screw press mechanical driers |
| 14 | Frames x 3 for holding jumbo sacks - Packing of finished agglomerate |

**Storage Area Details**

| Plan Ref | Description | Storage type | Containment / type | Height of firewall (m) | Max width (m) | Max length (m) | Max height (m) | Max area (m) | Conversion factor used | Approx. volume (m3) - out-of-hours | Max storage time | Comments |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| AREAS 1 - 4 | Bays for unloading mixed waste streams for sorting and separation (waste may also contain as shown in AREAS 5-7) | Waste could be baled or loose | Concrete panel & concrete interlocking block fire walls | 4 | 20 | 7 | 3 | 140 | 1 | 420 | <8 weeks | Any wastes which could give rise to odour would be removed within 48 hours |
| AREAS 4 - 7 | Bays for unloading mixed plastic prior to treatment (waste may also contain as shown in AREAS 1-4) | Waste could be baled or loose | As above | 4 | 20 | 7 | 3 | 140 | 1 | 420 | <8 weeks | Any wastes which could give rise to odour would be removed within 48 hours |
| AREA 8 | Pre-processing bay containing plastic film prior to loading into the treatment plant | Waste could be baled or loose | As above | 4 | 8 | 6 | 3 | 48 | 1 | 144 | <24 hours | Area will continually load wastes into the pre-treatment area inside the building |
| AREA 9 | Mixture of baled material and product storage | Baled / processed | Concrete panel fire wall of building | 6 | 5 | 5 | 3 | 25 | 1 | 75 | <8 weeks | These areas will only store waste in the event the baler is used because the wash & extrusion plants have been decommissioned |
| AREA 10 | Mixture of baled material and product storage | Baled / processed | Concrete panel fire wall of building | 6 | 5 | 8 | 3 | 40 | 1 | 120 | <8 weeks | As above |


Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants


DRAWING TITLE: SITE LAYOUT & PLAN

CLIENT: W L Polymer Ltd

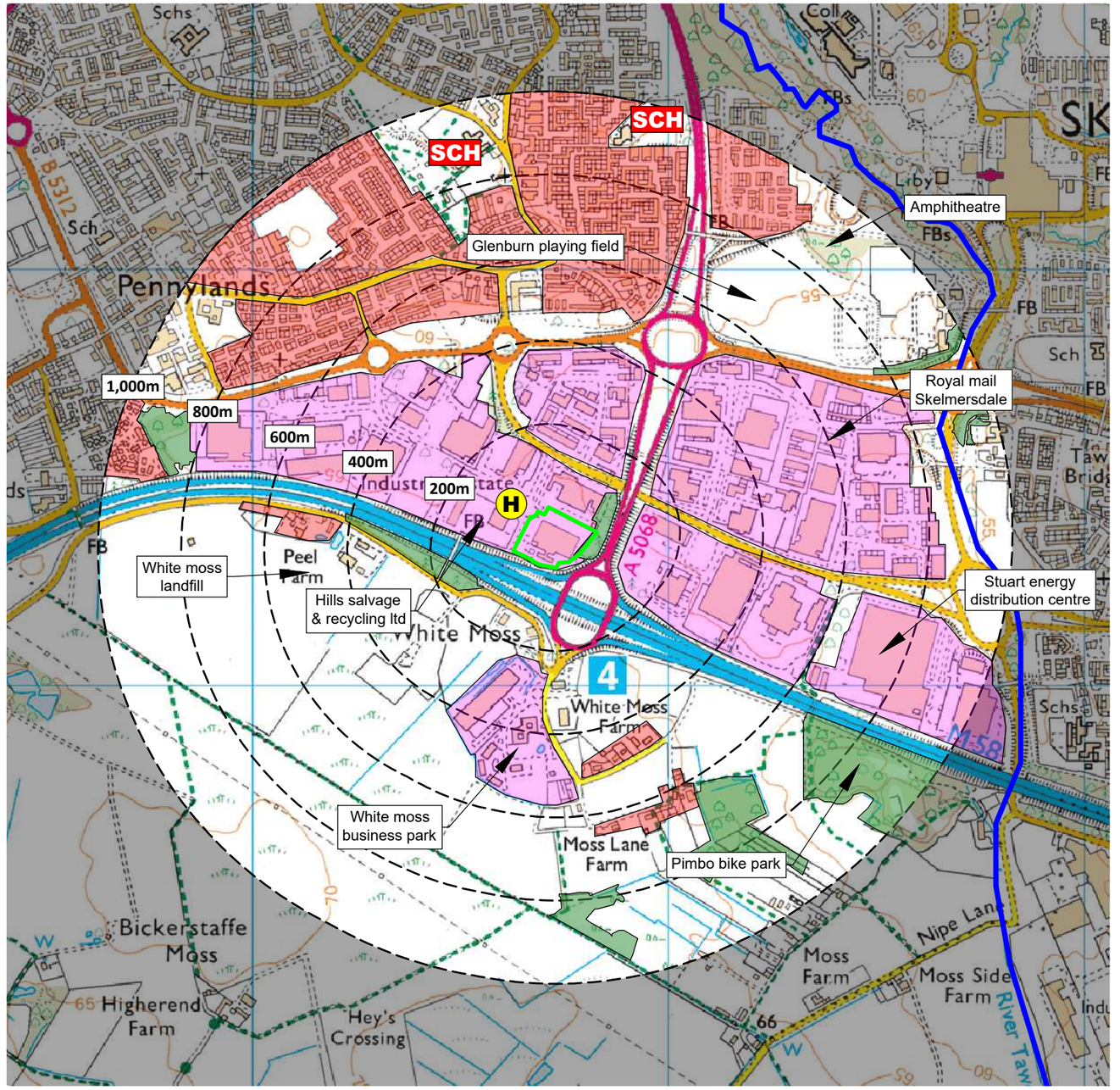
PROJECT/SITE: Gerrard Place, Skelmersdale WN8 9SU

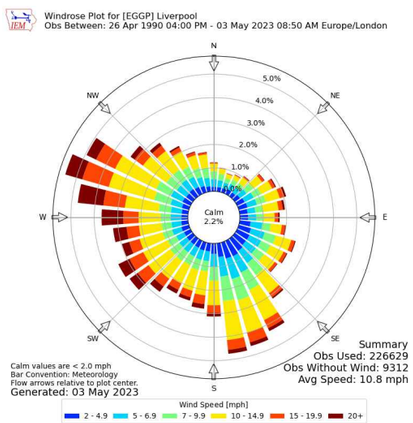
| SCALE @ A0 | CLIENT NO | JOB NO |
|---|---|---|
| 1:200 | 3329 | 001 |
| DRAWING NUMBER | REV | STATUS |
| GPL/3329/03 | A | Issued |
| DRAWN BY | CHECKED | DATE |
| CP | SK | 17.11.23 |


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: |
|---|---|---|---|
| - | 28.09.23 | JH | Initial drawing |

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

**DRAWING TITLE**
RECEPTOR PLAN

**CLIENT**
WL Polymer Ltd

**PROJECT/SITE**
Gerrard Place, Skelmersdale WN8 9SF

| SCALE @ A3 | CLIENT NO | JOB NO |
|---|---|---|
| 1:12,500 | 3329 | 001 |

| DRAWING NUMBER | REV | STATUS |
|---|---|---|
| GPL/3329/04 | - | Issued |

| DRAWN BY | CHECKED | DATE |
|---|---|---|
| JH | RS | 28.09.23 |

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

# Appendix II

# Record Forms

| **Odour Diary** | | | | **Sheet No** |
|---|---|---|---|---|
| **Name:**<br><br>**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?<br>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)

**W L POLYMER LTD**
**COMPLAINTS REPORT FORM (WLP/RF/7)**

| **Date Recorded:** | **Reference Number:** |
|---|---|
| Name and address of caller | |
| Telephone number of caller | |
| Time and Date of call | |
| Nature of complaint<br>(noise, odour, dust, other)<br>(date, time, duration) | |
| Weather at the time of complaint<br>(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 WLP/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.