Odour Management Plan

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Customer:		S L Recycling Ltd
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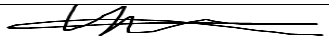
Signature:		Gareth Danter-Hill
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1 INTRODUCTION

1.1 Odour Management Plan - Objectives

1.1.1 This document outlines the methods by which SL Recycling Limited ***("the Operator")*** will systematically assess, reduce and prevent potentially odorous emissions from Unit 1, Pontyfelin Industrial Estate, New Inn, Pontypool, Torfaen, NP4 0DQ ***("the Site")***.

1.1.2 The Operator seeks to apply for a variation to the current Standard Rules Environmental Permit (reference: EPR/BB32299FN,) to a Tier 3 bespoke Environmental Permit. The Site accepts non-hazardous household, commercial and industrial wastes and comprises of a purpose-built enclosure which has been constructed on the Site to serve for the receipt of dry mixed recycling. Wastes are not burnt on Site at any time.

1.1.3 Metal recycling, now to include external shredding, also takes place on the Site in addition to the recovery and storage of end of life vehicles in a designated bay with treatment only involving depollution and dismantling.

1.1.4 This Odour Management Plan is submitted in support of the application and provides the explicit list of 'appropriate measures' required for effective odour management and control and serves to aid the decision-making process on the choice of controls, general Site design and operational practice in line with current industry best practice.

1.1.5 The Odour Management Plan (OMP) is a working document with the specific aim of ensuring that:

- All potential odour sources are identified;
- Odour impact is considered as part of routine inspections;
- Odour is primarily controlled at source by good operational practices, the correct use and maintenance of plant, and operator training;
- All appropriate measures are taken to prevent or, where that is not reasonably practicable, to minimise odorous emissions to air from the Site that may be considered offensive at locations outside of the Site boundary;
- People outside of the Site are not exposed to levels of odour that would result in annoyance;
- The risk of unplanned odour releasing incidents or accidents that would result in annoyance is minimised; and
- Site developments take into account odour potential and potential impacts from work carried out.

1.1.6 Once approved by National Resources Wales (NRW), this document will form part of the facility's Environmental Permit.

1.2 Site responsibility overview

1.2.1 The Site Manager will have responsibility for ensuring that potentially odorous emissions arising from the Site are minimised and that all process controls designed to reduce or treat odours are

managed / maintained.

1.3 Reference documents

1.3.1 The methodologies presented take full account of NRW's and other guidance documentation, as detailed below:

- H4 Odour Management: How to comply with your Environmental Permit (NRW, October 2014);

2 SITE ENVIRONMENTAL SETTING

2.1 Site details

2.1.1 The Site is located on the Pont-y-Felin Industrial Estate approximately 3km south of Pontypool Town centre. The Site neighbours are mixed industrial use land to the north, the A4042 dual carriageway to the west, the Newport Road to the south and the River Afon Lwyd valley to the east. The nearest residential properties are on the eastern side of the Afon Lwyd valley circa 60 m east of the Site.

2.1.2 A Site of Importance for Nature Conservation (SINC), the Pont-y-felin verge and ditch, is located within 50m of the boundary of the Site. A non-statutory site, it comprises of species rich marshy and neutral grassland and shrub that provides good connectivity for otters. A further SINC, the river Afon Lwyd is located less than 100m from the Site.

2.1.3 The Site formerly housed a High Temperature Incineration plant operated by Shanks Waste Management Ltd. under a permit issued originally by the Environment Agency. Operations ceased in 2003 and the Site has been progressively decommissioned, demolished and cleared during the intervening years. SL Recycling acquired the Site and have been operating as a non-hazardous waste transfer station and a facility for metal recycling and authorised depollution and dismantling of used vehicles since July 2019.

3 SOURCE – PATHWAY – RECEPTOR CHARACTERISATION

3.1 Odour source

3.1.1 The main source of odour are related to the household, commercial and industrial. Waste delivered to the Site is either deposited in a general waste reception area or directly into a dedicated storage area for waste of a particular type. The waste is then sorted with the assistance of mobile plant, segregated and stored in the dedicated storage bay or container before residual wastes are removed from the Site for reuse, recycling / reclamation, treatment or disposal.

3.2 Odour pathway

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

- Source-related pathways;

- Meteorological conditions; and
- Topography.

3.3 Source-related pathways

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

3.4 Meteorological conditions

Wind direction

3.4.1 The main controlling factor in determining the pathway of odour is the ambient meteorological conditions. This is fundamental to the transportation of odour to sensitive receptors. Wind direction will determine which receptors will be affected and at what frequency.

3.4.2 Statistics based on observations taken from the nearest weather station at Llanfrechfa, (c. 5 km south-east of the Site) between April 2012 and September 2020 indicate that, although the prevailing winds are variable, they originate predominantly from the west-south-west with an average speed of 4 knots. The rose diagram in Diagram 2 is conducive of this showing the wind strength distribution and direction is also chiefly from the W-S-W. (see Diagram 1). Data obtained from https://www.windfinder.com/windstatistics/llanfrechfa

Diagram 1 Average Prevailing Wind Direction and Speed

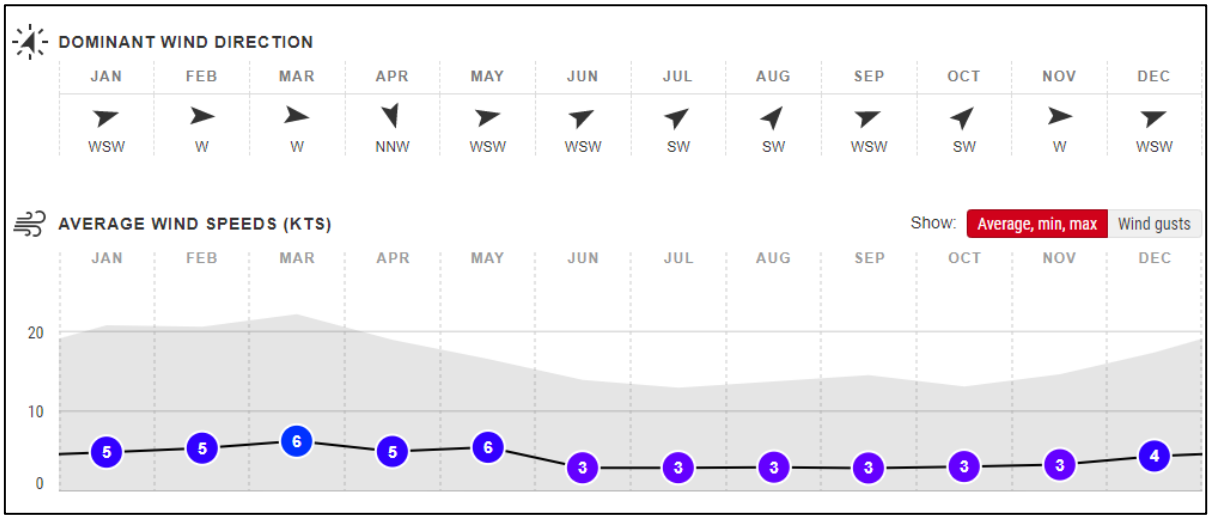
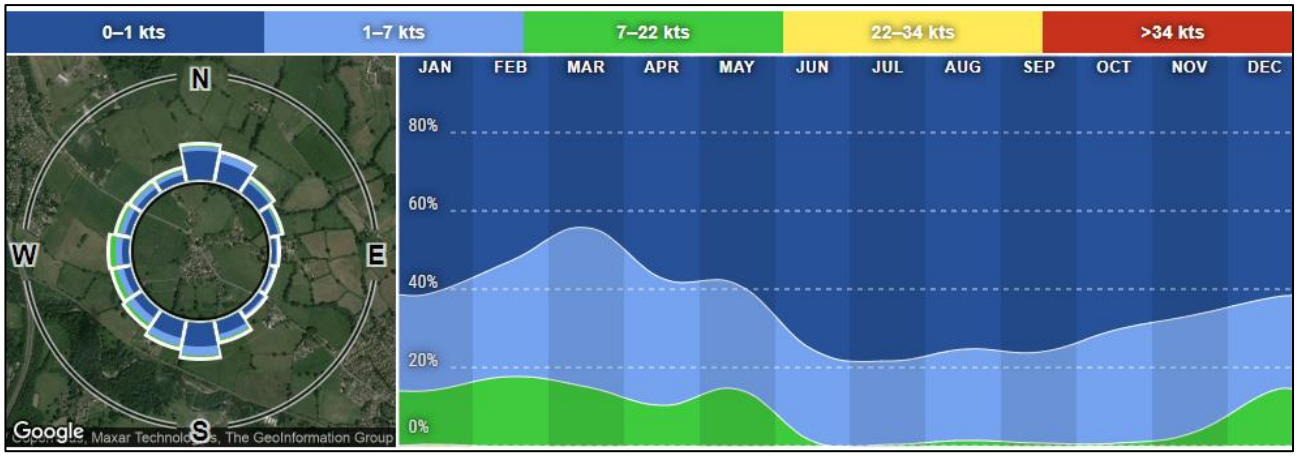


Diagram 2 Rose Diagram showing Annual Wind Strength Distribution and Direction



Wind velocity

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

Air temperature

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

Adverse weather conditions

3.4.5 Unusual weather conditions may increase the risk of odour emissions from the Site. Site staff will be vigilant to unusual trends in the meteorological data or forecasts which may indicate strong winds, thermal inversion or extremes of temperature which may cause a potential problem.

Odour receptor characterisation

3.4.6 Residential estates, commercial properties, recreational areas and associated establishments are located within a 1 km radius of the Site. Immediately to the north to north-west and west are industrial facilities and associated land; the nearest residential receptors are located c.60m to the east of the Site whilst rural fields bounded by hedgerow and trees occupy the land to the immediate north and south of the Site. The A4042 runs adjacent to the south-western boundary of the Site and is orientated in a north-west to south-easterly direction.

3.4.7 There is one European Environmental Designated Site of ecological significance within 2km of the Site, the Llandegfedd Reservoir which is a Site of Special Scientific Interest (SSSI). Although there are no further designated sites within 2km of the Site (i.e. Special Protection Areas, Special Areas of Conservation or RAMSAR sites), there is a Site of Importance for Nature Conservation (SINC), the Pont-y-felin verge and ditch, located within 50m of the boundary of the Site. A non-statutory

site, it comprises of species rich marshy and neutral grassland and shrub that provides good connectivity for otters. A further SINC, the river Afon Lwyd is located less than 100m from the Site.

3.5 Potential receptor locations

3.5.1 The Site is situated within a small industrial area approximately 3km south of the town of Pontypool in Torfaen with a long-standing industrial history. A review of the Site's environmental setting has highlighted potentially sensitive off-site receptors with regards to odorous emissions from the facility. These include residential areas and industrial premises. Residential properties within a 1km radius of the Site are shown in Table 1 below and on Figure 1 whilst other receptors, based on the hierarchy of most vulnerable, are shown in Table 2 and Figure 2

Table 1 Identified residential receptors within 1 km radius of the Site

Receptor	Receptor type	Distance (m) and direction from site boundary
1	Residential Housing Estate around Pont-y-felin Lane & Coed-y-felin, Lower New Inn (1)	60-470 NE
2	Residential Housing Estate around the Highway (2)	405-1000 NE
3	Residential Housing Estate adjacent to the railway track (3)	320-1000 W
4	Ty-Coch Farm (4)	405 SE
5	Church Farm (5)	705 E-NE
6	Ty-Cadno Farm (6)	720 SE

Figure 1 Site location and identified residential receptors within 1 km radius (use as a visual guide only)

Table 2 Identified sensitive receptors within 1km radius of the Site

Receptor Hierarchy	Facility and Reference Point	Distance and Direction from Site (m)	Overall exposure level	Comments
Medical Facilities	New Inn Medical Centre (1)	974 NE	Low	Although located downwind of the dominant prevailing wind it is considered remote from the Site. Pathways are also restricted by intervening infrastructures, trees and hedgerows.
	Tafarn Newydd Children & Families Services (2)	880 NE	Low	As above
	Griffithstown Primary School (3)	715 W	Low	Relatively distal from the Site with a low frequency of winds from source to receptor.
	Griffithstown Infant and Nursery School (4)	845 NW	Low	There is a medium frequency of winds towards the receptor and it is remote from the Site
Childcare	Cyfeillion Bach Nursery (5)	515 W	Low	Relatively distal from the Site with a low frequency of winds from source to receptor.

Receptor Hierarchy	Facility and Reference Point	Distance and Direction from Site (m)	Overall exposure level	Comments
Elderly Housing	Rowan House Nursing Home (6)	830 NW	Low	Not downwind of prevailing conditions and distal from the Site.
	Panteg Nursing Home (7)	610 W-SW	Low	Located upwind of the dominant wind direction and not in close proximity to the Site.
Recreational Areas	Playing Field (8)	200 N-NE	Medium	Downwind of prevailing conditions and reasonably close to source.
	Craig-y-Felin Wood (9)	340 S	Low	Although relatively proximal to the Site it is ocated upwind of the prevailing wind direction
	Sports Ground (10)	590 NW	Low	There is a medium frequency of winds towards the receptor and it is local to the Site
	New Panteg Rugby & Football Club (11)	602 N	Medium	Downwind of prevailing conditions and reasonably close to source.
	Panteg Cricket Club (12)	680 W-SW	Low	Located upwind of the Site and is reasonably distal.
	Panteg Park (13)	990 W	Low	Remote from the Site and there is a low frequency of winds from source to receptor
Places of Worship	New Inn Congregational Church (14)	245 NE	Medium	Directly downwind of the Site and prevailing wind. Relatively proximal to the Site
	St Marks Church Panteg (15)	585 NE	Low	Although located downwind of the dominant prevailing wind it is considered relatively distal from the Site. Pathways are also restricted by intervening infrastructures, trees and hedgerows.
	Griffithstown Baptist Church (16)	715 NW	Low	Not downwind of prevailing conditions and distal from the Site.
	Methodist Church (17)	590 NE	Low	Directly downwind of the Site and prevailing wind but relatively distal from the Site
	St Oswald Church in Wales (18)	720 SW	Low	Located upwind of the dominant wind direction and not in close proximity to the Site.
	Griffithstown Congregational Church (19)	823 NW	Low	Not downwind of prevailing conditions and distal from the Site.
	St Hildas Church Hall (20)	910 NW	Low	As above
	St Marys Church, Panteg Church Hall (21)	890 N	Low	There is a high frequency of winds from source to receptor but the receptor is considered to be remote from the source
Other	Gwent Police (22)	505 NE	Low	Directly downwind of the Site and prevailing wind but relatively distal from the Site
	Railway Museum (23)	527 W	Low	Relatively distal from the Site with a low frequency of winds from source to receptor.

Receptor Hierarchy	Facility and Reference Point	Distance and Direction from Site (m)	Overall exposure level	Comments
	Fire Station (24)	670 NW	Low	Not downwind of prevailing conditions and distal from the Site.
	New Inn Community Hall (25)	730 N-NE	Low	Directly downwind of the Site and prevailing wind but relatively distal from the Site
	Pontefelin Industrial Estate (26)	0 – 576 N-NW	Medium	Although there is a low frequency of winds towards this receptor, it is adjacent to the Site

Figure 2 Site location and identified sensitive receptors within 1 km radius (to be used as a visual guide only)

3.5.2 This Odour Management Plan has been written with due regard to the potential for Site operations to impact upon all of the key off-site receptor locations.

3.5.3 Numerous other potential sources of odour emissions have been identified as part of this review, which have been listed below (note that this is not an exhaustive list). Contributing factors include any industry or waste facility type that may generate offensive odour from operational processes within a 1 km radius of the Site.

Table 3 Other odour emitting operators

Company	Address	Type of business	Distance (m) / Direction from site boundary
Recycled Solutions	Old Newport Road, New Inn, Pontypool, NP4 0TP	Waste	151 SE
Biffa Pontypool	Unit 4, Polo Grounds, Pontypool NP4 0TW	Waste	665 N

4 BACKGROUND INFORMATION

4.1 General

4.1.1 An odorant is a substance which stimulates the human olfactory system such that an odour is perceived (BS EN 13275:2003). A series of judgements can be made on odour with regards to recognition (ability to differentiate between odours), intensity (perceived strength at differing concentrations), the Hedonic Tone (pleasantness / offensiveness) and association and complexity of odours (memory we have with an odour such as flowers, waste etc.).

4.1.2 Ambient air monitoring should take into consideration the following factors (H4 Odour Guidance, October 2014):

- It is often difficult for investigators to witness odour incidents which are episodic and short-lived;
- Emissions are greatly diluted from their point of release, and are often below detection limits of instruments but can still be detected by people;
- Peaks in exposure may be due to changing dispersion conditions (wind direction, turbulence) or variable emissions (e.g. opened doors);
- It can be difficult to work out where an emission comes from or to distinguish it from other sources.

4.2 Odour definition

4.2.1 Guidance from the Department for Environment, Food and Rural Affairs (DEFRA) defines odour as follows:

"An odour is the organoleptic attribute perceptible by the olfactory organ on sniffing certain volatile substances. It is a property of odorous substances that make them perceptible to our sense of smell. The term odour refers to the stimuli from a chemical compound that is volatilised in air. Odour is our perception of that sensation and we interpret what the odour means. Odours may be perceived as pleasant or unpleasant. The main concern with odour is its ability to cause a response

in individuals that is considered to be objectionable or offensive.

Odours have the potential to trigger strong reactions for good reason. Pleasant odours can provide enjoyment and prompt responses such as those associated with appetite. Equally, unpleasant odours can be useful indicators to protect us from harm such as the ingestion of rotten food. These protective mechanisms are learnt throughout our lives. Whilst there is often agreement about what constitutes pleasant and unpleasant odours, there is a wide variation between individuals as to what is deemed unacceptable and what affects our quality of life."

4.3 Odour impacts

4.3.1 The magnitude of odour impact depends upon a number of factors and the potential for complaints varies due to the subjective nature of odour perception. The FIDOR acronym, outlined below, is a useful reminder of the factors which will determine the degree of odour pollution.

- **F**requency of detection - frequent odour incidents are more likely to result in complaints;
- **I**ntensity as perceived - intense odour incidents are more likely to result in complaints;
- **D**uration of exposure - prolonged exposure is more likely to result in complaints;
- **O**ffensiveness - more offensive odours have a higher risk of resulting in complaints; and,
- **R**eceptor sensitivity - sensitive areas are more likely to have a lower odour tolerance.

4.3.2 The FIDOR factors can be further considered to provide the following issues in regard to the potential for an odour emission to cause a nuisance:

- The rate of emission of the Site;
- The duration and frequency of emissions;
- The time of the day that the emission occurs;
- The sensitivity of receptors to the emission (i.e. whether the odorous compound is more likely to cause nuisance, such as to the sick or elderly, who may be more sensitive);
- The odour detection capacity of individuals to the various compound(s); and
- The individual perception of odour (i.e. whether the odour is regarded as unpleasant). This is greatly subjective and may vary significantly from individual to individual. For example, some individuals may consider some odours as pleasant, such as petrol, paint and creosote.

4.4 Odour legislative control

4.4.1 The main requirement with respect to odour control from industrial activities is the Environmental Permitting (England and Wales) Regulations (2016) and subsequent amendments. If a process is deemed potentially odorous then the relevant regulator will usually include an appropriate condition in the site's Environmental Permit to restrict impacts beyond the facility boundary.

4.4.2 Enforcement of the condition is by the relevant regulator, either Natural Resources Wales (NRW)

or the Environment Agency for Schedule 9 Waste Operations and Schedule 1 Part A(1) processes, or the Local Authority for Part (A2) and B processes. If the regulator is satisfied that odour from a facility is causing pollution beyond the site boundary, then they can serve an improvement notice that requires remedial works to be undertaken to reduce impacts to an acceptable level. The measures that are deemed appropriate will depend on the industry sector and site-specific circumstances and will take costs and benefits into account. Should appropriate actions not be taken by the operator then the regulator has a number of available options, culminating in the revocation of the Environmental Permit and cessation of all activities on site.

4.4.3 The main requirement with respect to odour control from premises not controlled under the Environmental Permitting (England and Wales) Regulations (2016), is that provided in Section 79 of Part III of the Environmental Protection Act (1990). The Act defines nuisance as:

"Any dust, steam, odour or other effluvia arising on industrial, trade or business premises and being prejudicial to health or a nuisance."

4.4.4 Enforcement of the Act, with regard to nuisance, is currently under the jurisdiction of the local Environmental Health Department, whose officers are deemed to provide an independent evaluation of nuisance. If the Local Authority is satisfied that a statutory nuisance exists, or is likely to occur or happen again, it must serve an Abatement Notice under Part III of the Environmental Protection Act (1990). Enforcement can insist that there be no odour beyond the boundary of the works. The only defence is to show that the process to which the nuisance has been attributed and its operation are being controlled according to best practice measures.

4.4.5 The legislative controls described above were considered as necessary throughout the undertaking of the assessment.

4.5 National Planning Policy

4.5.1 The National Planning Policy Framework[1] (NPPF) was published on 27th March 2012 and sets out the Government's core policies and principles with respect to land use planning, including odour. The document includes the following considerations which are relevant to the proposed development:

"The planning system should contribute to and enhance the natural and local environment by: […]

"Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability."

4.5.2 The implications of the NPPF have been considered throughout this assessment.

5 METHODOLOGY FOR DETERMINING RISK IMPACT

5.1 Introduction

5.1.1 The Site has the potential to generate odour impacts because of the temporary storage of a variety of waste materials as well as the delivery which will disturb materials and potentially

[1] NPPF, Department for Communities and Local Government (2012).

generate odours. Nearby receptors, as identified in Section 3, have the potential to receive adverse effects. The impact has therefore been assessed using the Institute of Air Quality Management (IAQM)'s 'Guidance on the Assessment of Odour for Planning' document[2] and H4 Odour Management (NRW, October 2014).

6 SITE PROCESS DESCRIPTION

6.1 Introduction

6.1.1 Household, commercial and industrial wastes for recovery or disposal off-Site are manually sorted, separated and bulked up within the waste transfer station enclosure with recyclables removed upon deposition for energy from waste at an authorised facility.

6.1.2 Metal recycling involves the sorting, separation, grading, shearing, shredding, baling, compacting, granulating of cables and cutting (using only hand-held equipment) of ferrous metals or alloys and non-ferrous metals for recovery. Storage and recovery of waste motor vehicles also takes place on Site in a designated bay with treatment comprising of dismantling and depollution only.

6.1.3 End of Life Vehicles are received via the weighbridge, where they are inspected for quality and contamination prior to transferal to designated depollution bays within the Site. These bays are fitted with interceptor drainage systems to eliminate the possibility of water contamination. The motor vehicles are manually depolluted.

6.1.4 Wood wastes are stored securely in the designated bay shown on the drawing in Figure 4 where it is also sorted and separated for recovery. Quantities of waste stored does not exceed 10,000 tonnes in total at any one time and no more than 15,000 tonnes will be accepted at the Site over a yearly period. No waste is stored for longer than three months, with the typical turnover less than two weeks.

6.2 Site layout

6.2.1 The attached site plan shows the layout of the Site facilities and odour monitoring locations which are denoted as yellow + signs. The Environmental Permit boundary is shown by the green outline.

6.3 Waste acceptance procedures

6.3.1 All wastes received on Site will be inspected on receipt to confirm their description and composition against the relevant waste transfer note and other accompanying documentation.

6.3.2 Wastes will be kept separate and not mixed with other wastes until they have been confirmed and recorded for acceptance at the Site.

6.3.3 All waste accepted at the Site will be solid, not liquid or gaseous.

6.3.4 No hazardous waste (other than oils, brake fluid, antifreeze etc as an integral component of end of life vehicles prior to their depollution and dismantling) or concentrations of poisonous or noxious pollutants are to be accepted to the Site at any time.

[2] Guidance on the Assessment of Odour for Planning, IAQM (2014).

6.3.5 No waste liquids, sludges or putrescible materials will be accepted at the Site at any time.

6.3.6 Any items of non-permitted waste which are detected after acceptance at the Site will be placed immediately into the designated quarantine area. In the unlikely event that these are or appear to be highly odorous wastes or hazardous wastes, NRW will be immediately informed.

6.3.7 In the quarantine area, wastes will be kept segregated from other wastes which are or are likely to be incompatible. Quarantined wastes (including any inadvertently received highly odorous wastes) will be stored and removed from the Site as a priority incident and within 24 hours, subject to an authorised facility being able to accept them within this timescale.

6.3.8 A record will be kept in the Site Diary of all rejected waste and all waste kept in quarantine storage.

6.3.9 Areas and containers will be clearly defined and labelled to identify the waste stored within them.

6.3.10 Any inadvertently received incompatible waste which is likely, in combination with each other or with other material at the facility, to give rise to pollution of the environment or harm to human health outside the Site, will be clearly identified and kept physically separate in designated areas.

6.3.11 If any unpermitted waste is delivered to the Site, the customer from where the waste was collected will be informed and requested to collect the waste from the Site, or the waste will be arranged to be returned to the producer or alternatively an authorised facility.

6.3.12 In the event that due to circumstances beyond the control of the Operator (such as the breakdown of critical plant on-Site or the closure and general non-availability of a landfill site or other outlet that waste is sent to) the quantity of waste builds up in the Site, possibly to levels approaching the maximums outlined in the Environmental Management System, NRW will be informed and alternative authorised facilities will be sought as a matter of urgency to ensure that waste levels are quickly controlled and materials do not give rise to odour.

7 WASTE TRANSFER CONTROLS

7.1 Background

7.1.1 In line with current industry best practice, the odour controls set out in the sections below will be used as the 'appropriate measures' to minimise and, wherever possible, prevent odour associated with Site operations.

7.2 Overarching management responsibility

7.2.1 The Site Manager will have responsibility for ensuring that potentially odorous emissions arising from the Site are minimised. Adequate staffing levels will be maintained at all times to ensure the effective operation of the facilities.

7.2.2 Site meetings will be held regularly, i.e. during monthly Health and Safety meetings, for Site management to discuss current and planned Site operations with respect to their potential for generating odorous Site emissions. Identified actions arising from the meetings and responsibilities for their completion will be recorded within the meeting minutes.

7.3 Identification of potential odour sources

7.3.1 In constructing robust risk-based management protocols for the Site, it is recognised that there are a number of potential odour sources associated with the Waste Transfer Station:

- Emissions from vehicles delivering wastes to the facility; and
- Emissions from waste storage, bulking up, storage and dispatch.

7.3.2 These matters are addressed further in the relevant sections below.

7.4 Waste source materials

7.4.1 With due regard to the potential for waste source material to be inherently odorous, key waste streams received at the facility are detailed in Table 4 below. Assessment of the associated odour potential under 'normal' operational conditions is also provided for certain materials.

Table 4 Waste feedstock inventory and source materials

WASTE ACCEPTANCE FOR HOUSEHOLD, COMMERCIAL AND INDUSTRIAL WASTE TRANSFER STATION WITH TREATMENT.

Waste Code	Description	Odour risk
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 10	waste metal	Low
10	**Wastes from thermal processes**	
10 12	**Wastes from manufacture of ceramic goods, bricks, tiles and construction products**	
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)	Low
10 13	**Wastes from manufacture of cement, lime and plaster and articles and products made from them**	
10 13 14	Waste concrete only	Low
12	**Wastes from shaping and physical and mechanical surface treatment of metals and plastics**	
12 01	**wastes from shaping and physical and mechanical surface treatment of metals and plastics**	
12 01 01	ferrous metal filings and turnings	Low
12 01 03	non-ferrous metal filings and turnings	Low
12 01 17	waste blasting material other than those mentioned in 12 01 16	Low
15	**Waste packaging**	
15 01	**Packaging (including separately collected municipal packaging waste)**	
15 01 01	paper and cardboard packaging	Low

Waste Code	Description	Odour risk
15 01 02	Plastic packaging	Low
15 01 03	Wooden packaging	Low
15 01 04	Metallic packaging	Low
15 01 05	Composite packaging	Low
15 01 06	Mixed packaging	Low
15 01 07	Glass packaging - Clean glass only	Low
16	**Wastes not otherwise specified in the list**	
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)	
16 01 03	end-of-life tyres	Low
16 02	**wastes from electrical and electronic equipment**	
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	Low
16 03	**off-specification batches and unused products**	
16 03 04	inorganic wastes other than those mentioned in 16 03 03	Low
16 06	**batteries and accumulators**	
16 06 05	other batteries and accumulators	Low
17	**Construction and demolition wastes (including excavated soil from contaminated sites)**	
17 01	**Concrete, bricks, tiles and ceramics**	
17 01 01	concrete	Low
17 01 02	Bricks	Low
17 01 03	Tiles and ceramics	Low
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	Low
17 02	**Wood, glass and plastic**	
17 02 01	Wood	Low
17 02 02	Clean glass only	Low
17 02 03	Plastic	Low
17 04	**metals (including their alloys)**	
17 04 01	Copper, bronze, brass	Low
17 04 02	Aluminium	Low
17 04 03	Lead	Low
17 04 04	Zinc	Low
17 04 05	Iron and steel	Low
17 04 06	Tin	Low
17 04 07	Mixed metals	Low
17 04 11	Cables other than those mentioned in 17 04 10	Low
17 08	**Gypsum based construction material**	

Waste Code	Description	Odour risk
17 08 02	Gypsum only other than that mentioned in 17 08 01	Medium
17 09	**other construction and demolition wastes**	
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	Low
19	**Wastes from waste management facilities, off-site waste water treatment plants and preparation of water intended for human consumption/industrial use**	
19 01	**wastes from incineration or pyrolysis of waste**	
19 01 02	ferrous materials removed from bottom ash	Low
19 12	**Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**	
19 12 01	Paper and cardboard	Low
19 12 02	Ferrous metal	Low
19 12 03	Non-ferrous metal	Low
19 12 04	Plastic and rubber	Low
19 12 05	Glass	Low
19 12 07	Wood other than that mentioned in 19 12 06	Low
20	**Municipal wastes (household waste and similar commercial, industrial**	
20 01	**Separately collected fractions**	
20 01 01	Paper and cardboard	Low
20 01 02	Clean glass only	Low
20 01 10	Clothes	Low
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	Low
20 01 38	wood other than that mentioned in 20 01 37	Low
20 01 39	Plastics	Low
20 01 40	Metals	Low
20 03	**Other municipal wastes**	
20 03 01	Mixed municipal waste	Medium-High
20 03 07	Bulky waste	Low

WASTE ACCEPTANCE FOR METAL RECYCLING, VEHICLE STORAGE, DEPOLLUTION AND DISMANTLING (AUTHORISED TREATMENT) FACILITY.

Waste Code	Description	Odour risk
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 10	waste metal	Low
10	***Wastes from thermal processes***	
10 02	***Wastes from the iron and steel industry***	
10 02 01	*Wastes from the processing of slag*	Low
10 02 02	*Unprocessed slag*	Low
10 02 08	*Solid wastes from gas treatment other than those mentioned in 10 02 07*	Low
10 02 10	*Mill scales*	Low
10 03	***Wastes from aluminium thermal metallurgy***	
10 03 02	*Anode scraps*	Low
10 03 05	*Waste alumina*	Low
10 03 16	*Skimmings other than those mentioned in 10 03 15*	Low
10 03 18	*Carbon-containing wastes from anode manufacture other than those mentioned in 10 03 17*	Low
10 10	***wastes from casting of non-ferrous pieces***	
10 10 06	*casting cores and moulds which have not undergone pouring other than those mentioned in 10 10 05*	Low
10 10 08	*casting cores and moulds which have undergone pouring other than those mentioned in 10 10 07*	Low
11	***Wastes from chemical surface treatment and coating of metals and other materials; non-ferrous hydro metallurgy***	
11 02	***wastes from non-ferrous hydrometallurgical processes***	
11 02 03	*wastes from the production of anodes for aqueous electrolytical processes*	Low
11 02 06	*wastes from copper hydrometallurgical processes other than those mentioned in 11 02 05*	Low
11 05	***wastes from hot galvanising processes***	
11 05 01	*hard zinc*	Low
12	**Wastes from shaping and physical and mechanical surface treatment of metals and plastics**	
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics	
12 01 01	ferrous metal filings and turnings	Low
12 01 03	non-ferrous metal filings and turnings	Low

Waste Code	Description	Odour risk
15	**Waste packaging, absorbents, filter materials, wiping cloths and protective clothing not otherwise specified**	
15 01	Packaging (including separately collected municipal packaging waste)	
15 01 04	metallic packaging	Low
16	**Wastes not otherwise specified in the list**	
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)	
16 01 17	ferrous metal	Low
16 01 18	non-ferrous metal	Low
16 01 22	discarded components not otherwise specified	Low
16 06	**batteries and accumulators**	
16 06 01*	lead batteries	Low
17	**Construction and demolition wastes (including excavated soil from contaminated sites)**	
17 04	metals (including their alloys)	
17 04 01	copper, bronze, brass	Low
17 04 02	Aluminium	Low
17 04 03	Lead	Low
17 04 04	Zinc	Low
17 04 05	iron and steel	Low
17 04 06	Tin	Low
17 04 07	mixed metals	Low
17 04 11	cables other than those mentioned in 17 04 10	Low
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 01	wastes from incineration or pyrolysis of waste	
19 01 02	ferrous metals removed from bottom ash	Low
19 10	**wastes from shredding of metal-containing wastes**	
19 10 01	iron and steel waste	Low
19 10 02	non-ferrous waste	Low
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	
19 12 02	ferrous metal	Low
19 12 03	non-ferrous metal	Low
20	**Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions**	
20 01	separately collected fractions (except 15 01)	

Waste Code	Description	Odour risk
20 01 33*	lead batteries	Low
20 01 40	Metals	Low

WASTE ACCEPTANCE FOR TREATMENT OF WOOD WASTE FOR RECOVERY.

Waste Code	Description	Odour risk
15	**Waste packaging**	
15 01	**Packaging (including separately collected municipal packaging waste)**	
15 01 03	Wooden packaging	Low
17	**Construction and demolition wastes (including excavated soil from contaminated sites)**	
17 02	**Wood, glass and plastic**	
17 02 01	Wood	Low
17 09	**other construction and demolition wastes**	
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	Low
19	**Wastes from waste management facilities, off-site waste water treatment plants and preparation of water intended for human consumption/industrial use**	
19 12	**Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**	
19 12 07	Wood other than that mentioned in 19 12 06	Low
20	**Municipal wastes (household waste and similar commercial, industrial**	
20 01	**Separately collected fractions**	
20 01 38	wood other than that mentioned in 20 01 37	Low

7.5 Waste feedstock reception and storage

7.5.1 All vehicles delivering wastes to the Site stop at the weighbridge and are weighed. The weighbridge operator examines waste descriptions at the weighbridge and the information is checked against the pre-acceptance documentation, six figure European Waste Catalogue Code(s) and other details on the Waste Transfer Note or Season Ticket as well as against the waste types and quantities permitted by the Environmental Permit.

7.5.2 Every delivery of waste is recorded, detailing the date of the transaction, weight, waste type, registered carrier, Waste Transfer Note number, vehicle registration and other pertinent information against a unique reference number via the FRED software system. It allows for tracking of wastes, the generation of reports and waste returns, as well as providing comprehensive, auditable information.

7.5.3 A banksman instructs lorry drivers to reverse into the appropriate bay within the Site for off-loading according to the type of waste being delivered to ensure materials are stored and processed separately. A visual and olfactive inspection of the contents of all waste loads, including those received in enclosed containers, is made during deposit.

7.6 Odour control measures

7.6.1 Pre-acceptance and acceptance checks will be made and any waste loads that are highly odorous will be designated as priority material for rapid transfer from the Site (refer to paragraphs 7.6.3 and 7.6.4 below for further details)

7.6.2 In the unlikely event that any highly odorous wastes are inadvertently received they will be placed in a sealed and lidded container and stored as quarantined wastes until they can be removed off-site to the producer or authorised facility. The use of a lidded skip or container will help to minimise any potential odour release during their storage on Site and subsequent transport off-site. The removal of any highly odorous wastes from the Site will be regarded as a priority incident and carried out as soon as practicable and within 24 hours (if not the same day), subject to the producer or authorised facility being able to accept them within this timescale.

7.6.3 The Operator will pay particular attention to wastes that have the potential to become highly odorous such as gypsum and any biodegradable waste to ensure that such materials are prioritised for removal off site so that extended storage times do not occur and that odour generation is avoided (typically these wastes only become highly odorous if they are stored for too long, hence rapid turnaround times will be imposed).

7.6.4 Following acceptance at the Site, the maximum storage time for waste with above a 'low' risk rating for odour, prior to transfer will be up to two days for the higher risk material (which is within the five days maximum stated in Environment Agency Sector Guidance Note S5.06 'Guidance for the Recovery and Disposal of Non-hazardous and Hazardous Waste'), which states *"storage within the reception area should be for a maximum of five working days"*. The material deemed to pose above a Low risk accepted at site is listed below and the storage criteria will be adhered to on site:

EWC Code and Description	Maximum Quantity (T)	Maximum Storage Time	Stored method to mitigate escape	Storage Time prior to Arrival
17 08 02-Gypsum	15	1 week	Sealed 40yd skip	1-2 weeks
20 03 01-Mixed Municipal waste	120	2 days	Undercover in an enclosure	2 days

7.6.5 The storage time outlined in section 7.6.4 only relates to the residual pile after sorting. The segregated material will form part of their own stockpile and fall in accordance with the time limits identified within the FPMP as these elements are considered 'low' from an odour risk perspective.

7.6.6 The gypsum-based material only tends to release an odour when it encounters water/liquid, and this takes several weeks to occur as the mineral breaks down. The site ensure that the gypsum materials are accepted on their own in to avoid contamination from other wastes, they are also stored in a sealed skip to prevent the ingress of water. The material comes from private contracts where skips are stored for a maximum of a week before being collected, this reduces the prolonged storage of waste at source site.

7.6.7 The mixed municipal wastes are collected weekly from private contracts, this ensures that the material is at maximum, 7 days old when it gets accepted at site. Once on site, the swift processing and transfer operation results in the material being moved off site within 48 hours. Odour is unlikely to occur within this timeframe.

7.6.8 If any particularly odorous wastes are noticed, the site has a sealed 8yd skip for this purpose. This skip is the removed from site the same day.

7.6.9 It is the Operator's policy not to accept any wastes that are already highly odorous. However, in the unlikely event that highly odorous wastes are inadvertently received they will be transferred to the quarantine area and removed as a priority and within 24 hours (or the same day if possible) to a suitably authorised facility.

7.6.10 Incoming wastes will typically be processed on a first in first out basis, albeit that any potentially odorous wastes or wastes that have been placed in quarantined storage will be prioritised for removal.

7.6.11 Site cleaning procedures include sweeping out the bays, including the corners, to ensure all material is removed and potentially odorous residues do not remain in-situ. Operational staff will record the housekeeping of the bays on the appropriate checklist, maintained in the Site office, in order to adhere to the maximum emptying and cleaning frequency of 48 hours.

7.6.12 Sniff tests will be conducted at strategic areas around the Site at a minimum of twice daily if odorous wastes are accepted by accident.

7.6.13 Should the level of odour of the wastes accepted in 7.6.12 be considered as offensive (Level 4 or higher on the scale used in Table 5), the offending material will be transferred to the sealed quarantine container via permanent on-site plant and removed to another suitably authorised facility within 24 hours or if possible the same working day.

7.7 Planned temporary odorous activities

7.7.1 If it is necessary to complete planned temporary activities at the Site that have an associated high risk of off-site odour impact (e.g. plant refurbishment or removal of odorous unauthorised waste from Site), the Site Manager or other Technically Competent Person will ensure that a record is kept in the diary for site detailing:

- The operation being undertaken;
- The reason(s) for doing so;
- Planned additional odour mitigation measures; and
- Timescales for completion.

7.7.2 Consideration shall be given to the prevailing weather conditions when undertaking such activities in order to minimise any potential off-site odour impact. If the weather conditions are likely to lead to odour issues (e.g. if the wind direction is towards the closest receptors) the work will be postponed until conditions are favourable. The exception to this is where it is essential to complete works that day in order to minimise emissions from the Site or to prevent another emission or accident (for example unblocking a drain which may cause odour but prevent flooding or water pollution). In these exceptions control measures will be deployed to minimise the risk, for example the use of a temporary odour treatment spray which is stored in the pre-existing building along with the Site`s housekeeping equipment and products.

7.7.3 Weekly checks will be made on weather conditions to allow forward planning. The management weekly meeting is held on a Monday morning where any potential issues will be discussed, including weather conditions forecast for the week ahead.

7.7.4 Daily observations of weather conditions, including wind speed, direction and temperature, will also be recorded so that Site operations can be rearranged to adapt to changing conditions. The recordings will be made on the dust monitoring record sheets as this will avoid duplication of work and is undertaken by the same operative.

7.7.5 Unplanned temporary odorous activities (e.g. in the event of a Site emergency) will be addressed in accordance with the Odour Action Plan set out below.

7.8 Plant maintenance

7.8.1 Site infrastructure and plant will be inspected regularly for damage and wear by the Site Manager or other appointed responsible person. Records of these checks will be maintained in the Site Diary.

7.8.2 Trained maintenance staff can be called on to effect plant repairs quickly where required. Typically, mobile plant repairs can be undertaken within one working day, depending on the availability of spares.

7.8.3 Drainage systems will be visually inspected at weekly intervals for signs of sediment build up, in the event there are signs of build up the Site Manager, or other trained members of staff, will arrange for the drains to be cleaned. Sealed sumps will be inspected no less frequently than daily and after rainfall and emptied when the collected liquids reach 80% of the capacity of the sump as measured using a dipstick or equivalent gauge.

7.8.4 Inspections and emptying of sealed sumps will be recorded in the Site Diary.

7.8.5 All areas of hardstanding, impermeable pavement, sealed drainage systems, covered buildings, roofed areas, fixed bays and other containers, and storage areas for skips and containers will be inspected no less frequently than monthly to ensure the continuing integrity and fitness for purpose of their construction. The inspection and any necessary maintenance will be recorded in the site Diary.

7.9 Training

7.9.1 All personnel working at the facility will be subject to a formal documented training programme in accordance with Company procedures. Matters relating to Site odour management and control

form part of this core training programme for all individuals.

7.9.2 Additional training is also provided for personnel required to complete subjective odour surveys. The preferred standard for all staff and third-party specialist monitoring contractors completing subjective odour surveys is formal assessment for odour sensitivity and detection threshold in order to demonstrate suitability for this subjective monitoring role.

7.10 Community liaison

7.10.1 Site contact details and numbers are shown on the Company website. Direct feedback to Site is encouraged at all times in relation to any perceived issues associated with operational activities.

7.11 Contingency arrangements

7.11.1 Contingency arrangements are available at short notice to divert incoming waste loads or transfer wastes already received at the Site to other suitably authorised facilities for treatment or disposal, should the need arise.

7.11.2 Incidents that may cause contingency arrangements to be implemented include:

- Extreme weather that prevents vehicles or staff safely reaching the Site or compromises the operational efficiency of the facility;
- If the Site reaches a capacity where further waste loads cannot be received without compromising operational efficiency or compliance with the Environmental Permit;
- Identification of a waste load that is unacceptable for receipt or may cause odour levels that cannot be adequately controlled;
- Any major incidents such as fire or flooding which prevent or compromise the safe and efficient operation of the Site.

7.11.3 The requirement to implement contingency measures is only likely to arise infrequently, if at all. However, contingency arrangements will be maintained throughout the life of the Site as a necessary safeguard.

7.12 Emergencies and Incidents

7.12.1 In the event of an emergency, the Site Manager will be notified without delay. The gypsum-based materials are not considered here as they would take significant time to create odour, they would simply be removed from site in all eventualities listed as the quantity is relatively low (1 skip). The emergency measures will be implemented as a priority to mitigate the incident, as appropriate and detailed below:

Incident or emergency type	Likely Impact	Reduction step	Minimisation of impact step	Resolution step
Staff Absence	Prolonged storage of waste on site due to lack of staff availability to sort. Could result in an increase in odour noticed across the site.	Ensure that there are adequate staff on site to cover the operative working on the mixed waste. The staff could be pulled from other areas (metal sorting) to cover. Agency staff could be used if required.	Re-allocate staff working areas on site to cover the highest risk. This is to be done as soon as the operative is known to be absent.	The operations would continue as normal ensuring that odour creation doesn't increase to beyond what is usual on site.
Plant Breakdown	Very little impact as only the front-loading shovel is used within this area.	If a breakdown was to occur another item of plant would be required to push the material into the pile after loading.	Plant would be redeployed to ensure that the operations continue unhindered.	Plant would be fixed asap to ensure that all areas are at capacity. There are trained fitters operating on site permanently to help with this.
Infrastructure Failure	Potentially have a significant impact if the enclosure roof was to fail in storm conditions.	Cease waste imports to the area of the site.	Remove all mixed waste currently stored on site asap to limit risk of odour creation. Increase odour monitoring.	Repair all damaged infrastructure prior to waste acceptance
Odorous Load	Can result in temporary increase in odour creation.	Isolate the load if small place in quarantine skip. If entire load, reload to delivery vehicle and reject.	Increase odour monitoring for the day to ensure no release beyond permit boundary is noted.	Remove from site either immediately or the same day.
Loss of destination site	Could result in increased stockpiling	Cease import of any new material until suitable	The operator already has use	Ensure that other sites are

	on site, therefore, increases in odour.	outlet has been found.	of several facilities as an outlet. Increase monitoring if required.	happy to take a slightly increased quantity on a regular basis.
Lack of transport vehicles	Could result in increased stockpiling on site, therefore, increases in odour.	Reduce the importation of material to align with the amount of vehicles available to remove the material once processed.	Increase monitoring if required. Pay to have a haulier remove the material from site to replace the loss of transport vehicle(s).	Once vehicles are back to full operational levels, the material can be accepted again to the levels usual for site.

8 Facility odour management

8.1 Meteorological conditions

8.1.1 The predominant wind direction at the Site is from the west to south-west (refer to wind rose in the section 3.4). Checks will be made on weather conditions (detailed above) to allow forward planning. Daily observations of weather conditions, including wind speed, direction and temperature will be checked so that Site operations can be rearranged to adapt to changing conditions and any meteorological conditions identified that may cause adverse impacts from odour. For example, if hot weather was forecast for the end of the week, all material likely to cause odour in hot weather (mixed municipal wastes) will be removed from site prior to the predicted temperature rise.

8.1.2 The emphasis will be on controlling odour by good housekeeping rather than closing the Site on windy days.

8.1.3 In promoting proactive management of the risks arising at the Site, the Site Manager or other Technically Competent Person will review the forecast of local meteorological conditions at the start of each working week; with the details of these conditions being used to assess against proposed activities for the period. Key data to assist the Site Manager will be the assessment of wind speed, wind direction and potential atmospheric pressure changes. This will enable potential odour issues to be predicted and appropriate or necessary remedial action to be implemented.

8.2 Daily subjective odour survey

8.2.1 All Site personnel are responsible for reporting any odour problems immediately to the Site Manager or other Technically Competent Person.

8.2.2 The Site Manager or other Technically Competent Person will ensure that daily inspections are made of the Site boundary during operational periods in order to establish whether any significant odours are discernible. The frequency will be increased if significant odour is detected at the boundary or in the event of odour complaints. The increased frequency will continue until any odour is suitably mitigated and levels have been reduced.

8.2.3 The inspection will be undertaken as follows:

- Monitoring personnel will visit the locations identified on the site plan.
- Monitoring personnel will stand still and breathe deeply facing upwind for a period up to one minute.
- If odour is detected, but can only be detected in this manner, the odour 'intensity' should be recorded as two (slight/weak). If odour is detected while walking or breathing normally, the intensity should be recorded as at least three (distinct), refer to Table 5 for odour detection scale and action levels.
- The Site Manager or other Technically Competent Person will be notified immediately of any detected odours that are considered to have the potential to give rise to significant (>3 intensity) off-site odour impact. This will trigger a supplementary off-site odour survey at any downwind off-site potential receptor locations. Any off-site surveys will be undertaken in accordance with the method set out above.

Table 5 Odour Detection Scale and Action Levels

Odour Strength	Intensity Level	Description	Action
No odour/not perceptible	**0**	No odour in comparison to baseline conditions	None needed Record result in Site diary
The Odour Detection Threshold (ODT) is between 0 and 1			
Slight/very weak	**1**	Some doubt as to whether an odour is present	None needed Record result in Site diary
Slight/weak	**2**	An odour is present but cannot be described	None needed Record result in Site diary
Distinct	**3**	The odour is scarcely recognisable	None needed Record result in Site diary
The recognition threshold intensity is generally 3-10 times higher than the ODT			
Strong	**4**	The odour is easily recognisable	Inform Site Manager or other Technically Competent Person. Abatement measure required if odour persists
Very strong	**5**	The odour is offensive and exposure would be unfavourable	Inform Site Manager or other Technically Competent Person. Immediate transfer of offending material to the quarantine skip for removal off-site.
Extremely strong	**6**	The odour is offensive and requires mitigation	As above. The Site Manager to inform the Environment Agency

- ***Table adapted from 33 VDI 3940: 1993, Determination of Odorants in Ambient Air by Field Inspection, Pub. Verein Deutscher Ingenieure, Dusseldorf. Available from Beuth Verlag GmbH, Berlin. 3***

8.2.4 Observations including time, date, weather conditions, odour type, location, intensity, and extent will be recorded in a Site Diary, which will be maintained at the Site office. Any abnormal Site operating conditions will also be recorded in the survey.

8.2.5 Odour inspection personnel will be chosen from the weighbridge-based staff and those not employed on Site at all times of the working day who are unlikely to suffer from odour fatigue, i.e. the inability to detect relevant odours due to constant exposure.

8.2.6 All staff regularly responsible for assessing odour will complete documented training on the odour inspection procedure in addition to formal odour sensitivity and detection threshold assessments, as described above.

9 Odour action plan

9.1 Odour complaint investigation

9.1.1 The following actions will be taken on receipt of an external odour complaint:

- The responsible person receiving the complaint at the Site will immediately record the key details, initiating the investigation process. Details will be entered on an odour complaint report form (see Appendix 1) and the company's incident database. The form sets out the key information that should be recorded at this time in order to facilitate further suitable investigation.

- The Site Manager or other Technically Competent Person will be informed of the odour complaint as soon as possible, including the location, time and date of the complaint being lodged (where available).

9.1.2 In recognising that odour can be transient and short-lived, timely notification of odour complaints directly from the complainant or NRW is imperative to allow for appropriate investigation. If the odour complaint occurs more than 12 hours before notification is provided to SL Recycling Ltd., it is usually not possible to substantiate the complaint or pinpoint the cause. SL Recycling Ltd. will, however, contact the complainant where possible, review any operations at the time which had the potential to generate odour and complete and record a comprehensive complaint investigation. For complaints received within 12 hours of the incident the following actions will be undertaken:

- The Site Manager, other Technically Competent Person (or appointed representative) will visit the complaint location as soon as possible, with the aim of undertaking monitoring within 2 hours if this is possible within the working day. The Site Manager, other Technically Competent Person or their representative will subjectively determine odour presence or absence. Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible.

- If an odour is present, the key 'FIDOR' criteria will be assessed at the complaint location, as follows:

    - **Frequency** – is the odour intermittent or persistent; is there a history of complaints at this location?
    - **Intensity** – is the odour faint, moderate, strong, or very strong?
    - **Duration** – how long is the odour present at this location?
    - **Offensiveness** – provide a description of the odour; is it high, moderate, or low offensiveness?
    - **Receptor sensitivity** – is the odour present at a remote or highly sensitive location; is the odour plume localised or widespread?

9.1.3 The Site Manager or Other Technically Competent Person will subsequently undertake the following further assessment process:

- Review of the operations at the Site prior to and at the time of the complaint;

- Review of the environmental control systems prior to and at the time of the complaint;

- Review of the meteorological conditions (wind speed, wind direction, rainfall, atmospheric pressure) prior to and at the time of the complaint – to establish whether a pathway can be established between the Site and the complainant;

- Review of the previous complaint history at the location identified.

9.1.4 The odour complaint will be substantiated (or otherwise) by the Site Manager or other Technically Competent Person in accordance with the following (in order of priority):

(1) NRW has visited the complaint location and has provided confirmation that the odour exists, is significant, and is attributable to the facility;

(2) The Site Manager or other Technically Competent Person or their representative has visited the complaint location and has provided confirmation that the odour exists, is significant (see FIDOR assessment, above) and is attributable to the facility.

9.1.5 SL Recycling Ltd. will contact NRW to discuss each major incident as soon as possible following receipt of the complaint details, allowing sufficient time for the above investigation to be completed, and within a maximum target response period of 24 hours from complaint receipt. If the necessary contact details are available and direct feedback has been requested, SL Recycling Ltd. will also contact the complainant directly to discuss the issue, the findings of the subsequent investigation, and any actions arising.

9.1.6 Once actions have been completed the Site Manager or other Technically Competent Person or another designated member of staff will visit the complaint location to ensure that the odour has subsided.

9.1.7 Under SL Recycling`s complaints procedure any necessary action must be identified and a timetable for implementation agreed. If necessary, particular operations will be suspended whilst remedial measures are put in place. Where procedures are changed the Environmental Management System for the Site will be formally updated and the changes will be notified to all relevant staff. Records are kept and audited to ensure that these actions are followed up.

9.1.8 Any amendments to the Odour Management Plan will be notified to NRW. Where immediate implementation is required to prevent or reduce odorous emissions NRW will be contacted by telephone.

9.2 Non-conformances

9.2.1 Odour 'non-conformances' may be determined at the Site as follows:

- Receipt of an odour complaint that is clearly attributable to the facility;
- Detection of significant / offensive odour beyond the Site boundary during routine odour surveys that relates specifically to Site operations;
- Damage to or failure of on-Site odour control infrastructure.

9.2.2 In the event that any of the above odour 'non-conformances' are determined at the Site, the actions detailed below will be undertaken.

9.3 Responsible person(s)

9.3.1 SL Recycling`s primary point of contact will be the Site Manager for all matters associated with Site operations and environmental performance. In the event that the Site Manager is unavailable or non-contactable, the contingency management staff to be contacted will be as follows:

- **First call to:** Other Technically Competent Person
- **Thereafter:** Company supervisor or foreman
- The Site Manager will be informed.
- Thereafter the Site Manager will co-ordinate with (where appropriate):
  - NRW Officer
  - Local Liaison Group Members.

9.3.2 Note: Local community liaison group members will be notified by the Site Manager if the likelihood and potential significance of any incident is considered to be sufficiently high or may be sustained for an extended period. Details of actions and timescales for remediation will also be provided.

9.3.3 If not previously undertaken, the Site Manager or other Technically Competent Person or appropriate responsible person will undertake an investigation in order to determine the likely cause(s) of the off-site odour.

9.3.4 The investigation will incorporate detailed assessment of the Site infrastructure and waste operations against the specific requirements of the facility odour controls set out above, to determine any diversion away from 'normal' Site operating conditions.

9.3.5 Key items for consideration will be as follows:

- Material inputs – change in waste type, volume, odour characteristics;
- Building – building integrity, housekeeping, door control;
- Odour encapsulation – any malfunction or deterioration in odour encapsulation equipment performance;
- Failure of external electricity supply;
- Mechanical breakdown – e.g. blocked drains, delays in waste handling;
- Procedural failure (human error);
- Short-term abnormal weather patterns – wind direction, temperature, inversions, etc;
- Abnormal operating conditions – temporary odorous activities.

9.3.6 Upon identification of the likely odour source(s), the appropriate corrective and preventative measures will be identified and implemented under the direction of the Site Manager or other Technically Competent Person. Additional support and technical expertise will be provided by internal / external technical specialists, as required.

9.3.7 Where necessary, the Odour Management Plan requirements will also be reviewed in line with the details set out below, in order to ensure they continue to represent 'all appropriate measures'.

9.4 Timescales

9.4.1 In the event that it proves impracticable to carry out adequate remedial measures within one working day, the Site Manager or other Technically Competent Person will notify and agree with NRW the proposed actions and the timescales for their completion as a programme of works.

9.5 Records

9.5.1 Details of odour 'non-conformances' including subsequent investigations, timescales and remedial measures taken, and notifications of the relevant internal and external bodies will be recorded.

9.5.2 All odour complaints received at the Site will also be recorded on a Site Odour Complaint Report Form. Analysis of the Site operations at the time of the complaint, proximity and location of the complainant, assessment of other third-party odour sources in the area, date, and time will be recorded. The Environmental Management System will be used to maintain a comprehensive record of complaints received at the Site and will facilitate the analysis and trending of complaints, and the assessment of mitigation / control measure effectiveness.

9.6 Additional supportive odour monitoring

9.6.1 Where an odour issue is identified the requirement for (and frequency of) additional supportive odour monitoring will be identified, taking into consideration comments from NRW. This may include, but not be limited to:

- Additional on-Site subjective odour inspections;
- Additional Site perimeter subjective odour inspections;
- Additional off-Site subjective odour inspections.

10 Document and audit review

10.1 Review requirement and timescale

10.1.1 While operations continue at the Site that could give rise to the generation of odour, this Odour Management Plan will be formally reviewed by SL Recycling Ltd. at annual intervals in order to ensure the stated management controls and conditions continue to reflect best available techniques and the operational requirements/sensitivities at the Site, which may change over time.

10.1.2 An updated copy of the Odour Management Plan will be submitted to NRW following review, as required. Where SL Recycling Ltd. recognises the requirement for the immediate implementation of changes to the Odour Management Plan to prevent or reduce significant odorous emissions, measures will put in place to prevent any pollution or harm.

10.2 Audit

10.2.1 The processes described in this document will be audited in accordance with SL Recycling`s auditing procedures. Audit reports will be maintained at the Site office or other secure location off-Site.

10.3 Review and plan update

10.3.1 This Odour Management Plan sets out the appropriate measures SL Recycling Ltd. will undertake in controlling any odorous or potentially odorous activities from the facility. If, on review of the

performance of the facility, SL Recycling Ltd. and/or NRW propose to seek revision of this plan, then the following course of action will be undertaken by both parties:

(1) In potentially critical circumstances where SL Recycling Ltd. recognises the requirement for the immediate implementation of changes to the Odour Management Plan to prevent or reduce significant odorous emissions, these changes will be discussed with NRW without delay but may be actioned by the site, as necessary.

(2) Where SL Recycling Ltd. proposes changes to the Odour Management Plan that involve a more strategic and/or phased approach rather than a need for immediate implementation, a formal proposal will be submitted by SL Recycling Ltd. to NRW setting out the specific issues arising from document review, and the options/issues requiring SL Recycling Ltd.'s further attention following NRW approval. NRW will review SL Recycling Ltd.'s submission/updated Odour Management Plan and confirm they are satisfied with the proposed changes. The agreed required changes will then form the future 'appropriate measures' for the site with regard to odour management and control.

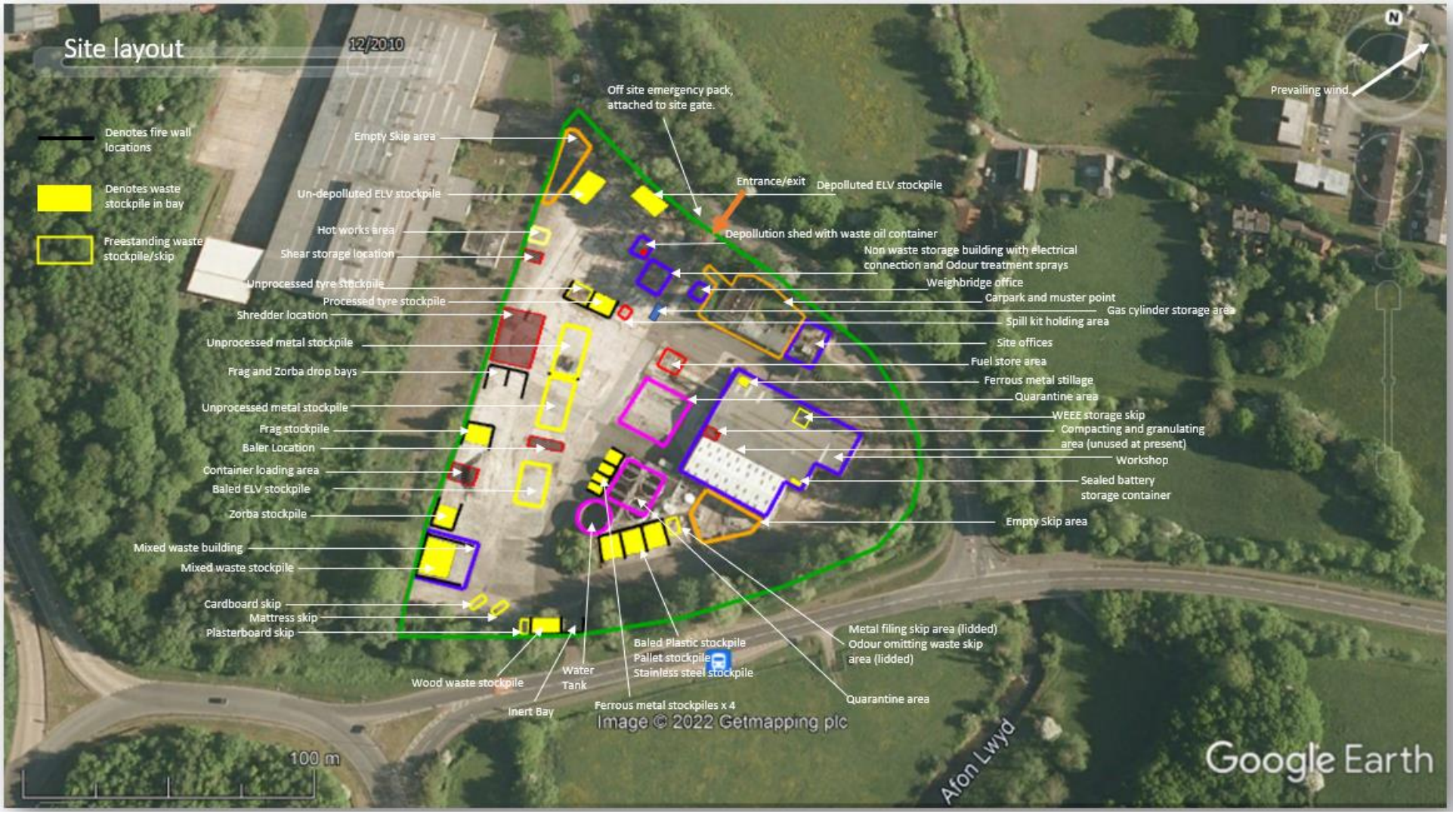
(3) Where changes to the Odour Management Plan are proposed by NRW, these will be discussed with SL Recycling Ltd. setting out the NRW`s clear expectation from the changes, in addition to timescales for their implementation. It is recognised that these changes may range from matters that require immediate implementation to those that may be implemented over an extended timeframe. In each case, the required changes will be discussed with SL Recycling Ltd. and an appropriate action plan agreed. SL Recycling Ltd. will (wherever possible) undertake the identified changes in accordance with the timescales proposed for the work, at which point the updated 'appropriate measures' will take effect.

Appendix 1 Complaint Record Form

COMPLAINT RECORD FORM

Who made the complaint?	
Name:	
Address:	
Phone No:	
Date and time they made the complaint	
What caused it?	
Was anyone else aware of this? If so who?	
What was the source of the problem, what went wrong? If source is unknown contact a suitably qualified person to investigate.	
What have you done to make sure it won't happen again?	
Was there any significant pollution – for example oil entering a surface water drain?	

If there was then you must notify National Resources Wales on 03708 506 506 (open 24hours/day) Have you done so? You must also notify National Resources Wales via email or letter.	Yes/No/not applicable Time: Date: NRW Incident number:
Please print name and sign:	


Site layout
12/2010
Denotes fire wall locations
Denotes waste stockpile in bay
Freestanding waste stockpile/skip
Off site emergency pack, attached to site gate.
Empty Skip area
Un-depolluted ELV stockpile
Hot works area
Shear storage location
Unprocessed tyre stockpile
Processed tyre stockpile
Shredder location
Unprocessed metal stockpile
Frag and Zorba drop bays
Unprocessed metal stockpile
Frag stockpile
Baler Location
Container loading area
Baled ELV stockpile
Zorba stockpile
Mixed waste building
Mixed waste stockpile
Cardboard skip
Mattress skip
Plasterboard skip
Wood waste stockpile
Inert Bay
Water Tank
Ferrous metal stockpiles x 4
Baled Plastic stockpile
Pallet stockpile
Stainless steel stockpile
Entrance/exit
Depolluted ELV stockpile
Depollution shed with waste oil container
Non waste storage building with electrical connection and Odour treatment sprays
Weighbridge office
Carpark and muster point
Gas cylinder storage area
Spill kit holding area
Site offices
Fuel store area
Ferrous metal stillage
Quarantine area
WEEE storage skip
Compacting and granulating area (unused at present)
Workshop
Sealed battery storage container
Empty Skip area
Metal filing skip area (lidded)
Odour omitting waste skip area (lidded)
Quarantine area
Prevailing wind
N
Image © 2022 Getmapping plc
100 m
Afon Lwyd
Google Earth


Building Access/exit locations and monitoring points
12/2010
Monitoring points
Image © 2022 Getmapping plc
100 m
Afon Lwyd
Google Earth