Client: Checkfire Limited
Address: Sir Alfred Owen Way, Pontygwindy Industrial Estate, Caerphilly, CF83 3HU

Checkfire Limited, Unit 10B, Sir Alfred Owen Way, Pontygwindy Industrial Estate, Caerphilly, CF83 3HU

Application for Bespoke Environmental Permit

Odour Management Plan (OMP)

08 July 2025

Our Reference: Checkfire Ltd-Odour Management Plan-RP07-Final

Waste And Industry Compliance Ltd

ENVIRONMENTAL CONSULTANCY SERVICES

☎	07748 363 125
✉	info@wasteandindustry.co.uk
🖱	www.wasteandindustry.co.uk

Checkfire Ltd-Odour Management Plan-RP07-Final

Version & Status	Date Produced	Prepared, Checked and Authorised by:
Draft v1	01/06/2025	Waste and Industry Compliance Ltd.
Final	08/07/2025	Waste and Industry Compliance Ltd.

Waste and Industry Compliance Limited
94 Wrekin Road,
Wellington,
Telford,
Shropshire,
TF1 1RJ

Telephone 07748 363 125
info@wasteandindustry.co.uk

CONTENTS

DRAWINGS

Drawing 'Sensitive Receptors'-DW02	1:20,000 @ A3
Drawing 'Indicative Site Layout and Storage'-DW03	1:300 @ A3
Drawing 'Site Drainage'-DW04	1:400 @ A3

1 INTRODUCTION

1.1 BACKGROUND

1.1.1 This Odour Management Plan (OMP) has been prepared on behalf of Checkfire Limited ***(the Operator)*** for Unit 10B, Sir Alfred Owen Way, Pontygwindy Industrial Estate, Caerphilly, CF83 3HU ***(the Site)***. It has been prepared in accordance with Natural Resources Wales (NRW) guidance 'How to comply with your environmental permit' (October 2014) and Additional Guidance for H4 Odour Management (March 2011).

1.1.2 The Operator was established in 1975 and is a leading supplier of fire extinguishers and high-quality ancillary equipment to trade customers in the UK and overseas.

1.1.3 The Operator seeks a bespoke Environmental Permit for the Site to authorise the return of out of date, spent or no longer required fire extinguishers from customers so that they can be safely emptied and decommissioned. In addition, small quantities of associated packaging wastes are received from customers, such as carboard, plastic wrapping and containers used to transfer the fire extinguishers to the Site. All packaging waste arises from the supply or return of fire extinguishers to or from customers.

1.1.4 The Site incorporates an enclosed and roofed concrete block and steel portal framed building fitted with impermeable concrete slab throughout. An external yard in front of the building comprises a combination of engineered concrete and block surfaces and is used for the storage of packaging waste in an enclosed and lidded skip. Deliveries of out of date, spent or no longer required fire extinguishers are off-loaded and transferred into the building for storage and processing.

1.1.5 The Site activities are summarised as follows:

- The receipt, storage and decommissioning of up to 60,000 out of date or spent or no longer required fire extinguishers per month (i.e. up to 720,000 units per annum);
- The storage and transfer of small quantities of non-hazardous packaging waste associated with the return of fire extinguishers to the Site (e.g. cardboard, plastic and paper packaging);
- Separately baling cardboard and plastic wastes on site;
- The emptying and transfer of spent or no longer required fire extinguisher foam media to an activated carbon absorption plant, which captures and contains contaminants in the carbon media, with the cleaned liquid media transferred into dedicated IBCs for off-site removal as a non-hazardous waste to authorised facilities. The used carbon absorption media is returned to the supplier for off-site processing;
- The emptying and transfer of spent or no longer required fire extinguisher powder media to a bagging plant for collection in bulk 1 tonne bags for transfer off-site to

an authorised recycling facility;

- The emptying and discharge of spent or no longer required deionised water to foul sewer in accordance with a Trade Effluent Discharge Consent issued by Welsh Water;
- The dismantling of empty foam, powder and deionised water fire extinguishers, with the metal and plastic components supplied to authorised off site recycling facilities. Dismantled metal components are transferred via an inclined conveyor to a 40 cubic yard skip located inside the building for bulking up and transfer off-site to an authorised scrap metal recycling facility;
- The storage of out of date or spent or no longer required CO_2 fire extinguishers, prior to their off-site removal to an authorised facility for emptying of gas media, refilling with new media and reconditioning of the cannister for supply to customers.

1.1.6 The proposed Environmental Permit boundary is shown on Drawing 'Indicative Site Layout and Storage', DW03. Local receptors within a 2km radius of the Site are shown on Drawing 'Sensitive Receptors', DW02.

1.1.7 This OMP provides an explicit list of the '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. It 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 incidents that would result in annoyance is minimised; and
- Site developments take into account odour potential and potential impacts from work carried out.

1.2 THE SITE

1.2.1 The Site is located on the Pontygwindy Industrial Estate, Caerphilly. It is bordered by other industrial units to the west, south and east. Sir Alfred Owen Way is located to the

immediate north, beyond which there are further industrial units within the Industrial Estate. The Site is accessed off Sir Alfred Owen Way.

1.2.2 The nearest residential properties are circa 145m west on Pantycelyn Drive, 150m west on Herbert Drive, 160m southwest on Lewis Drive, 165m south southwest on Howard Drive, 200m southwest on Dyfed Drive and 200m west on Davies Drive. The nearest domestic properties east of the Site are on Pontygwindy Road, circa 215m from the facility.

1.2.3 There is one European Site (i.e. Special Protection Area (SPA), Special Conservation Area (SAC) or Ramsar Site) within 10km of the Site, namely Cardiff Beech Woods SAC, which is circa 4,190m south of the facility.

1.2.4 There are two Sites of Special Scientific Interest (SSSI) within a 2km radius of the Site, namely Llanbradach Quarry SSSI, circa 983m to the north northwest and Gwaun Gledyr SSSI, circa 1,700 to the southwest of the facility.

1.2.5 There are nine Sites of Importance for Nature Conservation (SINCs) within a 2km radius of the Site, namely:

- Nant yr Aber SINC, circa 344m south southeast of the facility;
- Coed y Brain, Penyrheol SINC, circa 532m northwest of the facility;
- Mynydd Dimlaith and Cwm-y-Bwch, southeast of Llanbradach SINC, circa 1,036m north northeast of the facility;
- Rhymney River SINC, circa 1,187m east of the facility;
- Cwm yr Aber, South of Abertridwr SINC, circa 1,316m southwest of the facility;
- Mynydd Eglwysilan, north of Senghenydd SINC, circa 1,736m northwest of the facility;
- Gypsy Lane Wetland, south of Groeswen SINC, circa 1,792m southwest of the facility;
- Caerphilly/ Machen Disused Railway, east of Trethomas SINC, circa 1,848m southeast of the facility;
- Coed y Maerdy, east of Caerphilly SINC, circa 1,988m southeast of the facility.

1.2.6 There are Areas of Ancient Semi Natural Woodland circa 45m west southwest, 255m southwest and 340m southeast of the Site, with a belt of Ancient Woodland (Unknown Category) circa 255m east of the facility.

1.2.7 There are three Scheduled Monuments within a 2km radius of the Site (https://datamap.gov.wales/maps/new?layer=inspire-wg:Cadw_SAM#/):

- Caerphilly Iron Furnace, circa 1,184m southwest of the facility;
- Caerphilly Castle, circa 1,186m south of the facility;
- Cornish Type Engine House, Bryngwn Colliery, circa 1,311m northeast of the facility.

1.2.8 There are no Marine Special Protection Areas, National Nature Reserves, Biosphere Reserves or Local Nature Reserves within 2km radius of the Site.

1.2.9 There are no National Parks or Areas of Outstanding Natural Beauty (AONBs) within 10km of the Site.

1.2.10 The Site is not located within a designated Air Quality Management Area (AQMA) (https://uk-air.defra.gov.uk/data/laqm-background-home).

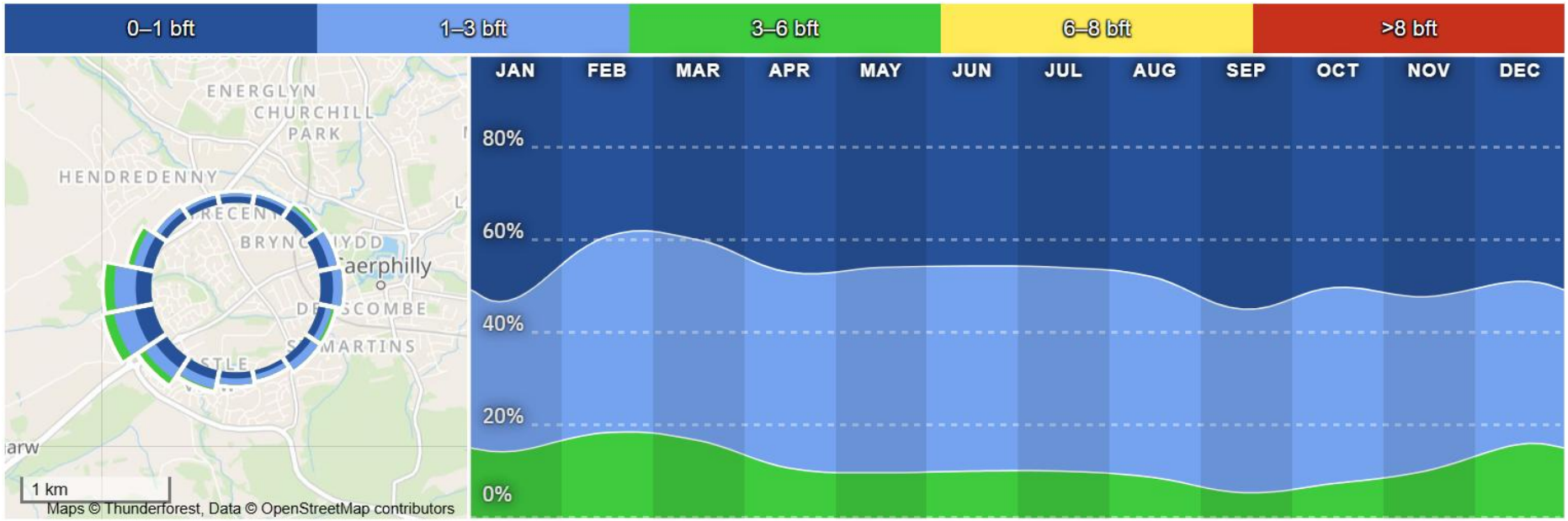
1.3 SITE RESPONSIBILITY OVERVIEW

1.3.1 The Site Manager or, during periods of absence, the Operations Director will have overall responsibility for ensuring that potentially odorous emissions arising from the Site are minimised and that all process controls are managed/maintained. Adequate staffing levels will be maintained at all times to ensure the effective operation of the facilities.

2 PREVAILING WINDS

2.1.1 Statistics on wind direction and wind speed are based on observations taken from the nearest weather station at Caerphilly (circa 1.65 km south southeast of the Site). This indicates that prevailing winds originate predominantly from the west and southwest (statistics are based on observations taken from the weather station between April 2013 and April 2025). The wind rose data is shown in Figure 1.

Figure 1: Monthly Wind Direction, Strength Distribution and Windrose



3 RECEPTORS

3.1.1 A review of potentially sensitive receptors has been undertaken, including residential properties, commercial and industrial premises, amenity areas, designated nature sites and areas of high landscape quality, such as Areas of Outstanding National Beauty (AONBs) and National Parks.

3.1.2 The nearest residential properties to the Site are located circa 145m west on Pantycelyn Drive, 150m west on Herbert Drive, 160m southwest on Lewis Drive, 165m south southwest on Howard Drive, 200m southwest on Dyfed Drive, 200m west on Davies Drive and 215m east on Pontygwindy Road.

3.1.3 The site is bordered by industrial units to the west, south and east. Sir Alfred Owen Way is to the immediate north, beyond which are other industrial units. Businesses in close proximity to the nearest Site boundary include: Ecosmart (Wales) Limited (immediately to the west), Magnera Composite Fibres (immediately to the south), Pronto Hire Limited (circa 15m north), Pontygwindy Café (circa 15m northeast), Universal Resource Trading Limited (circa 26m northwest), Fit Fit Garden (circa 25m east) and Saber Computer Services Limited (circa 27m northeast).

3.1.4 There is one European Site within 10km of the facility, namely Cardiff Beech Woods SAC, which is circa 4,190m south of the facility. The risk of any potentially odorous emissions from the Site causing impact to fauna or people accessing the SAC at this distance are considered insignificant.

3.1.5 The two SSSIs within a 2km radius of the Site are:

- Llanbradach Quarry SSSI, circa 983m to the north northwest to the facility. It is designated a SSSI due to its geological features, specifically the exposures of Longmyndian clastic sediments and Silurian limestone.

- Gwaun Gledyr SSSI, circa 1,700 to the southwest of the facility. It is designated a SSSI due to its extensive area of marshy grassland and smaller area of neutral grassland. These habitats are also associated with smaller areas of acid flush, wet heath, acid grassland and scrub. Broadleaved woodland also forms a significant percentage of the site, often as overgrown field boundaries; there is a large single area in the northwest of the site.

  The marshy grassland is dominated by purple moor-grass *Molinia caerulea*, with other grasses such as velvet bent *Agrostis canina* and sweet vernal-grass *Anthoxanthum odoratum*, together with tormentil *Potentilla erecta*, carnation sedge *Carex panicea* and often devil's-bit scabious *Succisa pratensis*. In places, the vegetation is more heathy with frequent cross-leaved heath *Erica tetralix* and bog mosses Sphagnum sp., whilst in wetter areas, herbs such as wild angelica *Angelica sylvestris*, marsh pennywort *Hydrocotyle vulgaris* and marsh violet *Viola palustris* can be found. In places, these can give way to dominant sharp-flowered rush *Juncus acutiflorus*, with a range of associated species such as ragged-robin *Lychnis flos-cuculi*, greater bird's-foot-trefoil *Lotus uliginosus* and common marsh

bedstraw *Galium palustre*.

3.1.6 There are nine Sites of Importance for Nature Conservation (SINCs) within a 2km radius of the Site, namely:

- Nant yr Aber SINC, circa 344m south southeast of the facility;
- Coed y Brain, Penyrheol SINC, circa 532m northwest of the facility;
- Mynydd Dimlaith and Cwm-y-Bwch, southeast of Llanbradach SINC, circa 1,036m north northeast of the facility;
- Rhymney River SINC, circa 1,187m east of the facility;
- Cwm yr Aber, South of Abertridwr SINC, circa 1,316m southwest of the facility;
- Mynydd Eglwysilan, north of Senghenydd SINC, circa 1,736m northwest of the facility;
- Gypsy Lane Wetland, south of Groeswen SINC, circa 1,792m southwest of the facility;
- Caerphilly/ Machen Disused Railway, east of Trethomas SINC, circa 1,848m southeast of the facility;
- Coed y Maerdy, east of Caerphilly SINC, circa 1,988m southeast of the facility.

3.1.7 There are Areas of Ancient Semi Natural Woodland circa 45m west southwest, 255m southwest and 340m southeast of the Site, with a belt of Ancient Woodland (Unknown Category) circa 255m east of the facility.

3.1.8 There are no Marine Special Protection Areas, National Nature Reserves, Biosphere Reserves or Local Nature Reserves within 2km radius of the Site.

3.1.9 There are no National Parks or Areas of Outstanding Natural Beauty (AONBs) within 10km of the Site. The risk of any odorous emissions from the Site causing significant impact on people living in, working in or accessing the nearest National Park and AONB is considered insignificant due to the distance between source and receptor.

3.1.10 Sensitive receptors at potential risk from any odorous emissions at the Site are shown on the Drawing 'Sensitive Receptors', DW02 and are listed in Table 1 below.

3.1.11 Table 1 uses the hierarchy of hospitals, schools, childcare facilities, elderly housing, convalescent facilities (i.e. areas where inhabitants are more vulnerable to the adverse effects of exposure to odour), residential properties, industry, major infrastructure, amenity areas and designated habitat sites.

3.1.12 In terms of predicted exposure risk, levels have been determined via a qualitative assessment which evaluates the likelihood of exposure to odorous emissions based on the receptors' proximity to the Site and the location of the sensitive receptors in regard to the prevailing wind direction as shown in Figure 1.

3.1.13 Due to the high number of sensitive receptors, not all residential properties and local businesses etc are individually assessed, as there are several thousand locations within the

assessment distance. Table 1 assesses the most proximate receptors within each category to provide information on the highest level of risk that would be encountered. Where mitigation measures demonstrate that the level of odour risk is low at the selected sites, it can be assumed that risk would also be low at more distant sites.

Table 1: Odour Risk Assessment

Receptor	Distance from Site	Risk Without Mitigation	Unmitigated Consequences	Comments	Risk After Mitgation
Medical					
Caerphilly Children's Centre	690m W	Low	Low / Mild	AFFF media, deionised water media, powder media and CO_2 gas are non-odorous and odour has not been detected on site from these materials. Small quantities of packaging wastes, including cardboard, plastic wrapping, other types of plastic, wood and paper, associated with the supply and return of fire extinguishers are received at the Site. These materials are either baled for supply to a local recycling facility or stored in a sealed and lidded skip, which is located on the external yard. Packaging wastes could in theory give rise to some odour if stored for an extended period of time. Wastes will be processed on a first in first out basis to ensure all materials are processed and removed from the Site typically within 2 working days, although this may extend to 5 working days during busy periods. The regular emptying and sweeping of waste storage and processing areas will ensure that materials are **not** allowed to accumulate over an extended period of time, thereby ensuring odorous emissions do not build up or accumulate over time. The building and external yard comprise engineered surfaces, which are swept (including the corners) to prevent the accumulation of any materials that could give rise to odour. There are no unpaved surfaces at the Site. Daily inspections of the operational area by the Site Manager or, in his absence, the Operations Director or other suitably trained site operative to ensure odour emissions are not arising from the Site. The receptor is upwind of the prevailing wind direction and is a significant distance from the Site.	Low

Receptor	Distance from Site	Risk Without Mitigation	Unmitigated Consequences	Comments	Risk After Mitgation
Courthouse Medical Centre	721m SE	Low	Low / Mild	The receptor is relatively distant from the site (over 500m). Wastes will be stored and processed inside a fully enclosed building, fitted with vehicular access roller shutter doors. The only waste stored on the external yard will be small quantities of packaging materials, which will be stored in a sealed and lidded skip. See above - regular emptying and sweeping of waste storage areas (including the corners) to ensure any residual wastes are not allowed to accumulate over an extended period of time. A hose will be available to clean operational areas and the external yard.	Low
Residential Care Home					
Glyn Derw	440m S	Low	Low/Medium	Located upwind of the prevailing wind direction. Use of odour control measures summarised above and set out in detail in Section 6 of this OMP.	Low
Brodawel Resource Centre	484m SW	Low	Low/Medium	Located upwind of the prevailing wind direction. Use of odour control measures summarised above and set out in detail in Section 6 of this OMP.	Low
Ty Gwilym	489m WSW	Low	Low/Medium	Located upwind of the prevailing wind direction. Use of odour control measures summarised above and set out in detail in Section 6 of this OMP.	Low
Schools and Colleges					
Ysgol Gyfun Cwm Rhymni	688m SSE	Low	Low/Mild	Relatively distant from the Site at over 500m. Use of odour control measures summarised above and set out in detail in Section 6 of this OMP.	Low
Plas Y Felin (Primary School)	763m S	Low	Low	Located upwind of the prevailing wind direction and distant from the Site at over 750m. Use of odour control measures summarised above and set out in detail in Section 6 of this OMP.	Low
Ysgol Gymraeg Caerffili (Primary School)	907m SSE	Low	Low	Located upwind of the prevailing wind direction and distant from the site (over 750m). Use of odour control measures summarised above and set out in detail in Section 6 of this OMP.	Low

Receptor	Distance from Site	Risk Without Mitigation	Unmitigated Consequences	Comments	Risk After Mitgation
Little Moons Bilingual Preschool	972m WSW	Low	Low	Located upwind of the prevailing wind direction and distant from the site (over 750m). Use of odour control measures summarised above and set out in detail in Section 6 of this OMP.	Low
Residential Properties					
Pantycelyn Drive	145m W	Medium	Medium	Although the residential properties are located upwind of the Site, they are in relatively close proximity and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to residents.	Low
Herbert Drive	150m W	Medium	Medium	Although the residential properties are located upwind of the Site, they are in relatively close proximity and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to residents.	Low
Lewis Drive	160m SW	Medium	Medium	Although the residential properties are located upwind of the Site, they are in relatively close proximity and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to residents.	Low
Howard Drive	165m SSW	Medium	Medium	Although the residential properties are located upwind of the Site, they are in relatively close proximity and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to residents.	Low
Dyfed Drive	200m SW	Medium	Medium	Although the residential properties are located upwind of the Site, they are in relatively close proximity and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to residents.	Low
Davies Drive	200m W	Medium	Medium	Although the residential properties are located upwind of the Site, they are in relatively close proximity and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation	Low

Receptor	Distance from Site	Risk Without Mitigation	Unmitigated Consequences	Comments	Risk After Mitgation
				measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to residents.	
Pontygwindy Road	215m E	Medium	Medium	The residential properties are located downwind of the Site and are in relatively close proximity. There is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to residents.	Low
Pontypandy Lane	280m ESE	Mild	Mild	Use of the mitigation measures summarised above and detailed in Section 6 of this OMP will be used to prevent any significant risks to residents.	Low
Heol Pwllypant	304m NNW	Mild	Mild	Use of the mitigation measures summarised above and detailed in Section 6 of this OMP will be used to prevent any significant risks to residents.	Low
Pontypandy Lane	306m SE	Mild	Mild	Use of the mitigation measures summarised above and detailed in Section 6 of this OMP will be used to prevent any significant risks to residents.	Low
Gruffydd Drive	317m SW	Mild	Mild	Use of the mitigation measures summarised above and detailed in Section 6 of this OMP will be used to prevent any significant risks to residents.	Low
Central Street	344m N	Mild	Mild	Use of the mitigation measures summarised above and detailed in Section 6 of this OMP will be used to prevent any significant risks to residents.	Low
Dylan Drive	355m SSW	Mild	Mild	Use of the mitigation measures summarised above and detailed in Section 6 of this OMP will be used to prevent any significant risks to residents.	Low
Industrial and Commercial					
Ecosmart (Wales) Limited	Adjacent W	High	Medium/High	The company is in close proximity to the Site and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to the neighbouring business.	Low

Receptor	Distance from Site	Risk Without Mitigation	Unmitigated Consequences	Comments	Risk After Mitgation
Magnera Composite Fibres	Adjacent S	High	Medium/High	The company is in close proximity to the Site and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to the neighbouring business.	Low
Pronto Hire Limited	15m N	High	Medium/High	The company is in close proximity to the Site and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to the neighbouring business.	Low
Pontygwindy Café	15m NE	High	Medium/High	The company is in close proximity to the Site and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to the neighbouring business.	Low
Fit Fit Garden	25m E	High	Medium/High	The company is in close proximity to the Site and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to the neighbouring business.	Low
Universal Resource Trading Limited	26m NW	High	Medium/High	The company is in close proximity to the Site and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to the neighbouring business.	Low
Saber Computer Services Limited	27m NE	High	Medium/High	The company is in close proximity to the Site and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to the neighbouring business.	Low
The Mortgage Team Limited (Douglas House)	32m W	High	Medium/High	The company is in close proximity to the Site and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this	Low

Receptor	Distance from Site	Risk Without Mitigation	Unmitigated Consequences	Comments	Risk After Mitgation
				OMP are used to prevent any significant risks to the neighbouring business.	
SJR Property Holdings Limited (Douglas House)	32m W	High	Medium/High	The company is in close proximity to the Site and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to the neighbouring business.	Low
Ram Plant Limited (Douglas House)	32m W	High	Medium/High	The company is in close proximity to the Site and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to the neighbouring business.	Low
Ocupy Holdings Limited	32m W	High	Medium/High	The company is in close proximity to the Site and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to the neighbouring business.	Low
JR Industries	75m NW	Medium/High	Medium/High	The company is in close proximity to the Site and there is the potential for odour impacts at this distance. Therefore it is important that the mitigation measures summarised above and detailed in Section 6 of this OMP are used to prevent any significant risks to the neighbouring business.	Low
Railway					
Rail Line	240m W	Low	Low/Mild	Upwind of the prevailing wind direction. Odour is unlikely to cause any significant impacts to persons using the trains, as they will quickly travel beyond the proximity of the Site, meaning exposure time is likely to be very short. Rail personnel maintaining the line in proximity to the Site would have longer periods of occupancy. The use of control measures detailed in Section 6 and summarised above would protect workers from any odour impacts.	Low
Energlyn and Churchill Park Railway Station	492m SW	Low	Low/Mild	Upwind of the prevailing wind direction. Odour is unlikely to cause any significant impacts to people at this distance. The use of control measures	Low

Receptor	Distance from Site	Risk Without Mitigation	Unmitigated Consequences	Comments	Risk After Mitgation
				detailed in Section 6 and summarised above would protect people from any odour impacts.	
Surface Water					
Nant Yr Aber	342m SE	Low	Low	Odour will not cause any significant impacts on water quality or flora and fauna associated with the watercourse. The use of control measures summarised above and set out in detailed in Section 6 of this OMP.	Low
Agricultural Land					
Agricultural Land	490m N	Low	Low	Although the nearest agricultural land is downwind of the prevailing wind direction, odour will not cause any impacts to arable crops or grazing animals. The use of control measures summarised above and set out in detail in Section 6 of this OMP.	Low
Ancient Woodland					
Ancient Semi Natural Woodland	45m SW	Medium	Medium	Odour will not impact woodland. Any person accessing the woodland would be protected by the control measures summarised above and set out in detail in Section 6 of this OMP.	Low
Ancient Semi Natural Woodland	255m SW	Low	Low/Mild	Odour will not impact woodland. Any person accessing the woodland would be protected by the control measures summarised above and set out in detail in Section 6 of this OMP.	Low
Ancient Woodland	255 E	Low	Low/Mild	Odour will not impact woodland. Any person accessing the woodland would be protected by the control measures summarised above and set out in detail in Section 6 of this OMP.	Low
Ancient Semi Natural Woodland	340m SE	Low	Low/Mild	Odour will not impact woodland. Any person accessing the woodland would be protected by the control measures summarised above and set out in detail in Section 6 of this OMP.	Low
Designated Habitat Sites					
Llanbradach Quarry SSSI (Geological SSSI)	983m NNW	Very Low	Very Low	Geological SSSI is distant from the Site. Geology will not be impacted by odour.	Very Low
Gwaun Gledyr SSSI	1,700m SW	Very Low	Very Low	Upwind of the prevailing wind direction and distant from the Site. Odour will not cause any impacts on flora and fauna and is highly unlikely to	Very Low

Receptor	Distance from Site	Risk Without Mitigation	Unmitigated Consequences	Comments	Risk After Mitgation
				impact persons accessing the habitat site at this distance. The use of control measures detailed in this OMP and summarised above.	
Nant yr Aber SINC	344m SSE	Low/Moderate	Low/Mild	At this distance it is considered unlikely that any odour emissions from the Site would have a significant impact on the SINC or persons accessing the location.	Low
Coed y Brain, Penyrheol SINC	532m NW	Low	Low/Mild	At this distance it is considered unlikely that any odour emissions from the Site would have a significant impact on the SINC or persons accessing the location.	Low
Mynydd Dimlaith and Cwm-y-Bwch SINC	1,036m NNE	Very Low	Very Low	Distant from the site. Odour will not cause any impacts on flora and fauna or persons accessing the habitat site at this distance.	Very Low
Rhymney River SINC	1,187m E	Very Low	Very Low	Distant from the site. Odour will not cause any impacts on flora and fauna or persons accessing the habitat site at this distance.	Very Low
Cwm yr Aber, South of Abertridwr SINC	1,316m SW	Very Low	Very Low	Distant from the site. Odour will not cause any impacts on flora and fauna or persons accessing the habitat site at this distance.	Very Low
Mynydd Eglwysilan, north of Senghenydd SINC	1,736m NW	Very Low	Very Low	Distant from the site. Odour will not cause any impacts on flora and fauna or persons accessing the habitat site at this distance.	Very Low
Gypsy Lane Wetland, south of Groeswen SINC	1,792m SW	Very Low	Very Low	Distant from the site. Odour will not cause any impacts on flora and fauna or persons accessing the habitat site at this distance.	Very Low
Caerphilly/ Machen Disused Railway SINC	1,848m SE	Very Low	Very Low	Distant from the site. Odour will not cause any impacts on flora and fauna or persons accessing the habitat site at this distance.	Very Low
Coed y Maerdy, east of Caerphilly SINC	1,988m SE	Very Low	Very Low	Distant from the site. Odour will not cause any impacts on flora and fauna or persons accessing the habitat site at this distance.	Very Low
Scheduled Monuments					
Caerphilly Iron Furnace	1,184m SW	Very Low	Very Low	Scheduled monument is upwind of the prevailing wind direction and distant from the Site. Odour is unlikely to cause any significant impacts to the receptor.	Very Low
Caerphilly Castle	1,186m S	Very Low	Very Low	Scheduled monument is upwind of the prevailing wind direction and distant from the Site. Odour is unlikely to cause any significant impacts to the receptor.	Very Low

Receptor	Distance from Site	Risk Without Mitigation	Unmitigated Consequences	Comments	Risk After Mitgation
Cornish Type Engine House, Bryngwn Colliery	1,311m NE	Very Low	Very Low	Scheduled monument is upwind of the prevailing wind direction and distant from the Site. Odour is unlikely to cause any significant impacts to the receptor.	Very Low

4 WASTE ACCEPTANCE

4.1 PERMITTED WASTES

4.1.1 The list of proposed wastes at the Site is detailed in Table 2 below, together with their associated odour emission risk under 'normal' operational conditions and without mitigation or control measures being applied.

Table 2: Proposed Wastes

ECW Code	Description	Odour Emission Risk Without Mitigation
15	**WASTE PACKAGING**	
15 01	**Packaging (including separately collected municipal packaging waste)**	
15 01 01	Paper and cardboard packaging	Low
15 01 02	Plastic packaging	Low
15 01 03	Wooden packaging	Low
15 01 04	Metallic packaging	Low
15 01 05	Composite packaging	Low/Mild
15 01 06	Mixed packaging	Low/Mild
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**	
16 05	**Gases in pressure containers and discarded chemicals**	
16 05 04*	Gases in pressure containers containing hazardous substances	Very Low
16 05 05	Gases in pressure containers other than those mentioned in 16 05 04	Very Low

4.2 WASTE PRE-ACCEPTANCE AND ACCEPTANCE PROCEDURES

4.2.1 As part of the waste acceptance procedures for the Site, waste producers will be required to provide details of any precautions that should be taken to control odour emissions.

4.2.2 Waste pre-acceptance procedures will ensure that only compliant waste types are accepted. Customers delivering waste to the Site will be required to provide the Operator, in advance, with all necessary information/documentation to satisfy the requirements of the Duty of Care and the Waste (England and Wales) Regulations 2011. The requirements for waste producers to provide pre-acceptance documentation that includes identification of any potential risks to the environment, such as from odorous materials, will help to identify any potential loads that should be rejected from the Site prior to delivery.

4.2.3 The Operator will check pre-acceptance documentation to ensure that only permitted fire extinguishers and associated packaging wastes are approved for delivery to the Site. Non-permitted wastes, including nitrogen cylinders/cannisters or halon filled fire extinguishers or any associated packaging waste that may be odorous, dusty or infected with vermin, flies or insects, will not be

accepted. Pre-acceptance documentation will record:

- The waste description;
- The European Waste Classification (EWC) code;
- The source and nature of the waste, including its physical form (e.g. if containing foam, liquid or powder media);
- Any special handling measures;
- Any potential risks to process safety, occupational safety and the environment;
- Details of the waste producer (name, address and contact details);
- Where the waste holder is not the producer, details of the waste holder (name, address and contact details);
- Information on the nature and variability of the waste production process and the waste;
- Age of the waste;
- Type of packaging;
- An estimate of the quantity to be received in each load and in a year.

4.2.4 Checks will also be made to establish whether the haulier is a Registered Waste Carrier or has a valid exemption from registration. Only registered carriers or those who are lawfully exempt from registration will be permitted to use the Site.

4.2.5 Waste will not be accepted if for any reason there is insufficient storage capacity available or if the Site is inadequately manned. This is to ensure that all waste is managed effectively to prevent pollution or loss of amenity.

4.2.6 Site staff will be suitably trained and will follow documented procedures. The Operator will examine the waste descriptions of incoming waste loads and the information will be checked against the previously supplied pre-acceptance documentation and against the waste types permitted by the Environmental Permit.

4.2.7 Every delivery of waste will be recorded, detailing the date of the transaction, volume, waste type, registered carrier, Waste Transfer Note number or Hazardous Waste Consignment Note number, vehicle registration and other pertinent information against a unique reference number. It will allow for tracking of wastes, the generation of reports and waste returns, as well as providing comprehensive, auditable information.

4.2.8 The contents of waste loads will be inspected upon receipt, i.e. before storage and processing in the building. In the event that a load is non-permitted or unsuitable for receipt at the Site, e.g. if it comprises nitrogen cylinders/cannisters or halon filled fire extinguishers or if any associated packaging is odorous, dusty or infested with vermin and insects etc, it will not be allowed to unload and will be rejected. A record of the non-permitted load will be made.

4.2.9 Suitable waste loads will be unloaded by site operatives using a fork-lift truck where fire extinguishers are received in containers loaded on to pallets or manually for any loads that are not received on pallets. Fire extinguishers will be stored upright in dedicated containers, each located on a pallet, according to the media they contain, i.e. foam, powder, deionised water and CO_2 containers will be stored separately. This will help to ensure materials do not come into contact and are processed separately, so that the cleanliness of recyclable materials is maintained and wastes are processed on a first in first out basis.

4.2.10 Checked and approved waste loads will be stored and processed inside the building.

4.2.11 In the event that any inadvertently received non-permitted or unsuitable wastes are detected following unloading, they will either be reloaded onto the delivery vehicle where possible or if it has already left the Site will be loaded into a fully sealed, enclosed and lidded skip or container for isolation and quarantine. The quarantined wastes will be prioritised for rapid removal off-Site to an authorised facility, i.e. within 2 working days of receipt.

4.2.12 Any discrepancies found as a result of the checks detailed above will result in the vehicle being detained whilst some, or all, of the following supplementary management decisions are taken:

- Referral to a Technically Competent Person (TCP) on site;
- Referral to the waste producer to confirm the nature of the waste load;
- Referral to the waste carrier's base;
- Referral to NRW;
- Redirection of delivery vehicle off site, to a suitably authorised facility; and
- If the waste has been unloaded in the building, removal of the waste to a secure quarantine skip or container, prior to off-site removal either to the waste producer or suitably authorised facility.

4.3 NON-CONFORMING WASTE

4.3.1 Any loads arriving at the Site which contain non-permitted wastes or a significant amount of contrary material, such as odorous packaging materials, shall be rejected prior to unloading. In the unlikely event that non-permitted or unsuitable wastes are inadvertently unloaded at the Site, they will be re-loaded where possible. Where the vehicle has already left the Site, the non-permitted or unsuitable wastes will be stored in a secure and lidded quarantine skip or container at the Site, pending removal of the material to the waste producer or authorised facility.

4.3.2 Material rejected from the Site shall be issued with a record stating why, when and from which contract the waste was provided. This record shall be held on Site for NRW to inspect. In addition a Record of Non-Conformance shall be completed and the record will be held on Site.

5 WASTE TREATMENT

5.1 AQUEOUS FILM FORMING FOAM (AFFF) MEDIA

5.1.1 Fire extinguishers containing Aqueous Film Forming Foam (AFFF) media will be emptied into dedicated IBCs, labelled for the specific receipt of such materials to avoid the risk of cross contamination.

5.1.2 An integral valve is located towards the base of each IBC. One end of a DN 100 hose connects to the IBC valve, whilst the other end feeds into the carbon absorption plant process inlet, via a valve which is opened at start up.

5.1.3 The carbon absorption plant is pre-loaded with activated carbon by the supplier. AFFF media is pumped through the unit in a downflow direction. The activated carbon absorbs PFAS chemicals, including PFAS and PFOA, removing them from the treated foam liquor. The process outlet of the unit is directed to above the height of the activated carbon bed with a siphon break at the top. This prevents the vessel draining down when flow is stopped.

5.1.4 The flow rate of AFFF media through the carbon absorption plant is controlled via the inlet valve and discharge valve. Pressure gauges are fitted to determine pressure at the inlet and outlet of the unit. A pressure relief valve is fitted as a safety measure, which is set to open should pressure reach or exceed 3 bar, i.e. to avoid over pressurisation of the unit.

5.1.5 Treated foam liquor is pumped from the carbon absorption plant, via a hose, to a clean IBC for removal off-site to an authorised facility. The cap at the top of the IBC is opened and the hose placed inside for filling. A check is made to ensure the valve near the base of the IBC is closed before filling commences. Once full, IBCs are stored on site for loading onto a HGV for removal off-site.

5.1.6 AFFF media is a liquid and is non odorous. It will not give rise to odour emissions. It's storage and transfer in IBCs is considered unlikely to give rise to any odorous emissions.

5.2 POWDER MEDIA

5.2.1 Disused or spent or returned fire extinguishers containing powder will be emptied by transferring the media via a vacuum pump through a dedicated hose that is connected to the fire extinguisher cylinder head at one end and into a 1,200 litres reception silo. The vacuum pump is fitted with a microporous filter. The system has a dedicated counter-current blowing cleaning system for the filter, valve and fire extinguisher suction unit. The main recovery inlets are operated with automatic valves controlled by start and stop mechanisms.

5.2.2 A 1 tonne capacity 'Big-Bag' is attached to the bottom of the silo and is secured by a metal clamp to ensure a tight seal and to minimise any fugitive emission of powder inside the building.

5.2.3 The silo is equipped with a level emitting alarm, which indicates when it is necessary to discharge into the 'Big Bag', via an automatic discharge valve. Once the bag is full, it is sealed at the top opening and transferred via a fork-lift truck to the loading area inside the building. 'Big Bags' are loaded onto curtain sided lorries or other suitable vehicles for transfer off-site to an authorised recycling facility, where the material is used for fertiliser manufacture.

5.2.4 The powder media is non-odorous and its emptying and transfer to the bagging plant is considered unlikely to give rise to any odorous emissions.

5.3 DEIONISED WATER MEDIA

5.3.1 Fire extinguishers containing deionised water media are emptied into dedicated and labelled IBCs, prior to discharge to foul sewer in accordance with a Trade Effluent Discharge Consent issued by Welsh Water. The Operator ensures that only dedicated IBCs are used for the receipt, storage and discharge of deionised water to foul sewer, thereby avoiding any potential risk of cross contamination from other media, such as foam.

5.3.2 The deionised water is non odorous and its emptying into IBCs and discharge to the foul sewer is considered unlikely to give rise to any odorous emissions.

5.4 CARBON DIOXIDE FIRE EXTINGUISHERS

5.4.1 Disused or spent or returned CO_2 extinguishers are received as part of a take back scheme from customers, where they are bulked up in containers inside the building prior to transfer off-site to an authorised facility for emptying and discharge of spent CO2 gas, reconditioning of the cylinder and cylinder head and refilling with new CO2 media. The reconditioned CO_2 fire extinguishers are suitable for reuse, with a design life of 10 years.

5.5 RECYCLING OF CYLINDER AND COMPONENTS

5.5.1 Once fire extinguishers are emptied, they are dismantled into their component metal and plastic parts for recycling by trained site operatives. All dismantling operations are undertaken inside the building.

5.5.2 The brass head cap is removed and is placed in a sealed container located on a pallet to facilitate removal and loading into a lorry for off-site removal to an authorised recycling facility.

5.5.3 Metal cylinders and metal dip tubes are transferred to an inclined conveyor, which feeds into the top of a 40 cubic yard roll on: roll off container. Once the container is full it is sheeted and transferred off site to an authorised scrap metal recycling facility.

5.5.4 Plastic skirts and plastic tubes are placed in a sealed container located on a pallet to facilitate removal and loading into a lorry for off-site removal to an authorised recycling facility.

5.5.5 The dismantling, sorting and separation of fire extinguisher cylinders will enable high rates of recycling to be achieved.

5.6 RECYCLING OF PACKAGING WASTES

5.6.1 Packaging waste associated with the supply of fire extinguishers to customers and the return of disused or spent or unwanted units by them, is sorted, separated and recycled on site. Separated cardboard and plastic wrapping are separately fed to a small compactor unit inside the building, prior to being transferred to a sealed and lidded skip or directly into an enclosed vehicle for removal off-site to an authorised facility. Only small quantities of carboard and plastic wrapping wastes are processed on site

and these are taken to a nearby recycling facility on a typically daily basis.

5.6.2 Other packaging wastes such as plastic bags, broken pallets etc are stored in a sealed and lidded skip for removal off-site to an authorised facility.

6 ODOUR CONTROL MEASURES

6.1 BACKGROUND

6.1.1 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 operations at the Site.

6.2 WASTE TYPES

6.2.1 The waste types and their potential to be inherently odorous are detailed in Table 2 above and are either very low, low or mild risk of causing odour. None of the waste types to be received at the facility are inherently highly odorous.

6.2.2 Fire extinguisher media received at the Site, i.e. AFFF media, deionised water media, powder media and CO_2 gas are non-odorous. Packaging wastes associated with the supply and return of fire extinguishers could in theory give rise to some odour if stored for an extended period of time, although the risk is considered low or mild. There is no history of odour complaint or odour detection associated with the Site.

6.3 WASTE ACCEPTANCE PROCEDURES

6.3.1 The waste acceptance procedures detailed in Section 4.2 above will be the initial method of preventing any potentially odorous loads being accepted at Site. The requirements for waste producers to provide pre-acceptance documentation that includes identification of any potential risks to the environment, including from odorous materials, will help to identify any potential loads that should be rejected from the Site prior to delivery.

6.4 WASTE STORAGE AND PROCESSING INSIDE THE BUILDING

6.4.1 Wastes will be stored and processed inside the building, which is fully enclosed and fitted with a vehicular access roller shutter door and pedestrian access doors.

6.4.2 The building floor comprises concrete. The external yard comprises a combination of engineered concrete and block paving surface. The unloading and loading area on the external yard is fully concreted and kerbed to 3 sides. Delivery vehicles access the external yard directly from the public highway on Sir Alfred Owen Way.

6.4.3 The Site operates on a first in first out basis to ensure that wastes are received, processed and dispatched typically within 2 working days, although this may extend to 5 working days during busy periods. The fast turnaround time of wastes on site ensures that materials are not stored for an extended period of time before processing and dispatch off-site to authorised facilities.

6.4.4 Housekeeping measures include daily sweeping during the course of the working day and at the end of the working day to ensure the Site is clean and tidy (the powder bagging area is typically vacuumed). The corners or waste storage and processing areas are swept and cleaned as a minimum every 5 working days, although durations are typically shorter.

6.4.5 The purpose of the sweeping and cleaning is to ensure all wastes and debris are removed and the potential for residual materials to accumulate over time and become odorous is minimised.

6.4.6 Checks are made during inspections by the Site Manager or, in his absence, the Operations Director or other suitably trained person to ensure all waste storage areas are emptied and cleared completely and that all materials are processed and dispatched from the Site and are not allowed to accumulate over extended periods of time, which minimises the risks of any wastes becoming odorous.

6.4.7 Additional sweeping and cleaning will take place:

- During periods of dry weather;
- During daily site inspections if noticeable odour is present or if there is the potential for odour emissions from the Site.

6.4.8 In the event that circumstances beyond the control of the Operator (such as the breakdown of critical plant on site or the closure and general non-availability of sites that the recycled and processed materials are typically sent to) result in the quantity of waste building up to levels approaching the maximum authorised in the permit, 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 odorous emissions.

6.5 WASTE STORAGE OUTSIDE THE BUILDING

6.5.1 Small quantities of packaging waste associated with the delivery or supply of fire extinguishers from customers is received at the Site. Packaging waste is not accepted from any other source or outlet.

6.5.2 Associated packaging wastes include plastics, occasional fragments of broken pallets and wood, paper etc are stored in a sealed and lidded skip for removal off-site to an authorised facility. The skip lid is kept closed other than when site operatives are transferring packaging materials inside. As soon as the materials are deposited into the skip, the lid is closed to form a tight seal that minimises any possibility of odorous emissions.

6.6 MATERIAL EXPORTED OFF-SITE

6.6.1 All recycled and dispatched materials from the Site will be in suitably enclosed containers such as IBCs or in sheeted vehicles or in lidded and closed skips to control the potential for fugitive emissions during transfer off site.

6.6.2 Material rejected from the Site will be issued with a record stating why, when and from which contract the waste was provided. This record is held on Site for NRW to inspect.

6.7 PLANNED TEMPORARY ODOROUS ACTIVITIES

6.7.1 In the unlikely event that 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 the Site), the Site Manager, Operations Director or other suitably trained person will ensure that NRW and any local public liaison group representatives are contacted before such actions commence to advise them of:

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

6.7.2 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 nearest residential 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.

6.7.3 Weekly checks will be made on weather conditions by the Site Manager using Meteorological Office predictions and recordings of local weather data (https://weather.metoffice.gov.uk/) to allow forward planning. 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.

6.7.4 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.

6.8 PLANT MAINTENANCE

6.8.1 Site infrastructure and plant will be inspected regularly for damage and wear by the Site Manager or other suitably trained person. Records of these checks will be maintained. All maintenance on the plant is programmed into the company's Planned Preventative Maintenance (PPM) system which generates work orders for up-coming maintenance and logs when that maintenance has been completed.

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

6.9 TRAINING

6.9.1 All site personnel working at the facility will be subject to a formal documented training programme in accordance with the Operator's procedures and EMS. Matters relating to this OMP, the control of odour and the prevention of any odorous emissions from the Site form part of this core training

programme for all individuals. Additional training is also provided for personnel required to complete subjective olfactory monitoring.

6.10 COMMUNITY LIAISON

6.10.1 Checkfire Ltd operates an open-door policy and members of the public are welcome to contact the Site to discuss any issues with the site management team. Prior arrangement will be made with site personnel, where possible, for any site visit that may be required.

6.10.2 Site contact details and 24 hours contact number 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.

6.11 CONTINGENCY ARRANGEMENTS

6.11.1 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 should the need arise.

6.11.2 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 emissions 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.

6.11.3 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.

6.12 EMERGENCY

6.12.1 In the event of a site emergency, the Site Manager and Operations Director will be notified without delay. The emergency measures will be implemented as a priority to mitigate the incident, as appropriate.

6.13 SITE INSPECTIONS

6.13.1 The Site Manager (or during his absence for leave etc, the Operations Director or other suitably trained person) will undertake both daily and weekly inspections of the Site. The daily inspections will include the waste storage and processing areas inside the building. The weekly inspections will be recorded and include the external perimeter area of the Site.

6.13.2 Monthly management meetings will include a review of current and planned site operations with respect to their potential for generating odour or any odorous emissions. Identified actions arising from the meetings and responsibilities for their completion will be recorded.

6.14 HOUSEKEEPING

6.14.1 The Operator will ensure efficient and regular housekeeping are used to maintain the Site in a tidy condition and to minimise any risks of odour escaping the building and site boundary.

6.14.2 The use of first in first out principles will ensure the Site operates a rapid turnover of waste materials and that the waste storage areas are emptied frequently, as a minimum every 5 working days, so that all materials are removed and the area is totally emptied and swept (including the corners of the building, storage and processing areas). This prevents the potential for any build-up of waste or debris and minimises the risk of odour generation.

6.14.3 Site sweeping will be carried out by site operatives under the supervision of the Site Manager or Operations Director.

6.14.4 The trigger for additional sweeping and cleaning will be during periods of dry weather, which may give rise to dusty conditions, during daily site inspections if odour or noticeable dust or litter or other debris is present.

6.14.5 In the event that circumstances beyond the control of the Operator (such as the breakdown of critical plant on site or the closure and general non-availability of sites that the recycled and recovered materials are typically sent to) result in the quantity of waste building up to levels approaching the maximum authorised in the permit, 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 fugitive emissions off site.

6.14.6 All wastes are dispatched from the Site in suitably enclosed containers such as IBCs or in sheeted vehicles or in lidded and closed skips to control the potential for odour emission during transfer off site.

7 FACILITY ODOUR MONITORING

7.1 METEOROLOGICAL CONDITIONS

7.1.1 The predominant wind direction at the Site is from the southwest and west (see Section 2, Figure 1). Weekly checks will be made on weather conditions to allow forward planning. However, daily observations of weather conditions, including wind speed, direction and temperature will also be checked so that site operations can be rearranged to adapt to changing conditions and any meteorological conditions identified that may cause poor dispersion in the atmosphere (e.g. temperature inversion events, which can result in still air and a reduction in atmospheric dilution rates in the immediate locality).

7.1.2 With a number of receptors around the Site the emphasis will be on controlling odour by good housekeeping rather than closing the facility on windy days.

7.1.3 In promoting proactive management of the risks arising at the Site, the Site Manager, Operations Director or other suitably trained 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 and Operations Director 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.

7.2 SUBJECTIVE ODOUR SURVEYS

7.2.1 All site personnel are responsible for reporting any odour problems immediately to the Site Manager or Operations Director.

7.2.2 A suitably trained site operative undertakes a routine inspection of the Site boundary every working day, with any relevant observations recorded and retained on-site. If odour is detected beyond the Site boundary, the matter will be treated as a priority incident and reported to the Site Manager or Operations Director for further investigation and mitigation.

7.2.3 The Site Manager or Operations Director will check to ensure that the above 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 in the unlikely event that significant odour is detected at the boundary or an odour complaint is received. The increased frequency will continue until any odour is suitably mitigated and levels have been reduced.

8 ODOUR ACTION PLAN

8.1 ODOUR COMPLAINT INVESTIGATION

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

- The 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 Complaint Form below). 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 Operations Director or other suitably trained 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).

Complaints Form	
Who made the complaint?	
Name:	

Address:	
Phone No:	
Date and time of 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 NRW Have you done so? You must also notify the local NRW Office via email or letter.	Yes/No/not applicable Date and Time: NRW Incident number:
Please print name and sign:	

8.1.2 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 the Operator, it may not be possible to substantiate the complaint or pinpoint the cause. The Operator 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, Operations Director or other suitably trained person 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, Operations Director or other suitably trained person 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?

8.1.3 The Site Manager, Operations Director or other suitably trained 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 any previous complaint history at the location identified (currently there is no recorded odour complaint history associated with the Site).

8.1.4 The odour complaint will be substantiated (or otherwise) by the Site Manager, Operations Director or other suitably trained person in accordance with the following (in order of priority):

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

(ii) The Site Manager, Operations Director or other suitably trained person 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.

8.1.5 The Operator will contact NRW to discuss any 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, the Operator will also contact the complainant directly to discuss the issue, the findings of the subsequent investigation, and any actions arising.

8.1.6 Once actions have been completed the Site Manager, Operations Director or other suitably trained person will visit the complaint location to ensure that the odour has subsided.

8.1.7 Under the Operator'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, this OMP 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.

8.1.8 Any amendments to the OMP will be notified to NRW. Where immediate implementation is required to prevent or reduce odorous emissions, NRW will be contacted by telephone.

8.2 NON-CONFORMANCES

8.2.1 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 environmental control infrastructure.

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

8.3 RESPONSIBLE PERSON(S):

8.3.1 The Operator'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: Operations Director
- Thereafter: Other suitably trained person.

8.3.2 The Site Manager, Operations Director or other suitably trained person will undertake a site investigation in order to determine the likely cause(s) of the off-site odour.

8.3.3 The site 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.

8.3.4 Key items for consideration will be as follows:

- Material inputs – change in waste type, volume, odour characteristics;
- 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.

8.3.5 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 Operations Director or other suitably trained person. Additional support and technical expertise will be provided by internal / external technical specialists, as required.

8.3.6 Where necessary, this OMP requirements will also be reviewed in order to ensure they continue to represent 'all appropriate measures'.

8.4 TIMESCALES

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

8.5 RECORDS

8.5.1 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.

8.5.2 All odour complaints received at the Site will be recorded on a Complaint Form (see above). 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.

8.6 ADDITIONAL SUPPORTIVE ODOUR MONITORING

8.6.1 Where an odour issue is identified the requirement for (and frequency of) additional supportive odour monitoring will be identified, taking into consideration any 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.

9 DOCUMENT AUDIT AND REVIEW

9.1 REVIEW REQUIREMENT AND TIMESCALE

9.1.1 This OMP will be formally reviewed by the Operator at annual intervals or in the event of a substantiated odour incident 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.

9.1.2 An updated copy of this OMP will be submitted to NRW following review, as required. Where the Operator recognises the requirement for the immediate implementation of changes to this OMP to prevent or reduce significant odorous emissions, measures will put in place to prevent any pollution or harm.

9.2 AUDIT

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

9.3 REVIEW AND PLAN UPDATE

9.3.1 This OMP sets out the appropriate measures the Operator will undertake in controlling any odorous or potentially odorous activities from the facility. If, on review of the performance of the facility, the Operator 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 the Operator recognises the requirement for the immediate implementation of changes to the OMP to prevent or reduce significant odorous emissions, these changes will be discussed with NRW without delay but may be actioned by the Operator, as necessary.

2. Where the Operator proposes changes to this OMP that involve a more strategic and/or phased approach rather than a need for immediate implementation, a formal proposal will be submitted by the Operator to NRW setting out the specific issues arising from document review, and the options/issues requiring the Operator's further attention following NRW approval. The agreed required changes will then form the future 'appropriate measures' for the Site with regard to odour management and control.

9.3.2 Where any changes to the OMP are proposed by NRW, these will be discussed with the Operator setting out 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 agreed and implemented. The Operator 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.

10 COMPLAINTS

10.1 PROCEDURES IN THE EVENT OF A COMPLAINT

10.1.1 Any complaints about the Site, e.g. from members of the public, local residents, neighbouring businesses, visitors, staff and regulatory bodies, including NRW, will be reported to the Site Manager and the Operations Director who are responsible for site management.

1.1.1 The following actions will be taken on receipt of an external 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 the Complaint Report Form, see below. The form sets out the key information that should be recorded at this time in order to facilitate further suitable investigation.
- The Site Manager and Operations Director will be informed of the complaint as soon as possible, including the location, time and date of the complaint being lodged.

Complaints Record	
Who made the complaint?	
Name:	
Address:	
Phone No:	
Date and time of 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 NRW Have you done so? You must also notify the local NRW Office via email or letter.	Yes/No/not applicable Date and Time: NRW Incident number:
Please print name and sign:	

10.1.2 In recognising that some complaints can be transient and short-lived, timely notification of complaints directly from the complainant or NRW is imperative to allow for appropriate investigation. If the complaint occurs more than 12 hours before notification is provided to the Operator, it may not be possible to substantiate the complaint or pinpoint the cause. The Operator will, however, contact the complainant where possible, review any operations at the time which had the potential to cause the complaint 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 or Operation Director or other suitably trained person 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 or Operation Director or other suitably trained person will subjectively determine the presence or absence of the cause of the complaint. Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible.
- If the cause of complaint is present, the key 'FIDOR' criteria will be assessed at the complaint location, as follows:
    - Frequency – is the cause of the complaint, intermittent or persistent; is there a history of complaints at this location?
    - Intensity – is the cause of complaint faint, moderate, strong, or very strong?
    - Duration – how long is the cause of complaint present at this location?

- Offensiveness – provide a description of the cause of complaint; is it high, moderate, or low offensiveness?
- Receptor sensitivity - is the cause of complaint present at a remote or highly sensitive location; is it localised or widespread?

10.1.3 The Site Manager or Operation Director or other suitably trained 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 previous complaint history at the location identified.

10.1.4 Where a significant complaint is substantiated by the Site Manager or Operation Director or other suitably trained person, the Operator will contact NRW to discuss the 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 the Operator will also contact the complainant directly to discuss the issue, the findings of the subsequent investigation, and any actions arising.

10.1.5 Once actions have been completed the Site Manager or Operation Director or other suitably trained person will visit the complaint location to ensure that the cause of complaint has subsided.

10.2 MITIGATION MEASURES IN THE EVENT OF A SUBSTANTIATED COMPLAINT

10.2.1 In the event of a substantiated odour complaint, the investigation undertaken by Site Manager or Operation Director or other suitably trained person 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.

10.2.2 Key items for consideration will be as follows:

- Material inputs – change in waste type, volume, odour characteristics;
- Mechanical breakdown – e.g. of processing plant or delays in waste handling;
- Procedural failure (human error);
- Short-term abnormal weather patterns – wind direction, temperature, inversions, etc;
- Abnormal operating conditions – temporary odorous activities.

10.2.3 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 Operation Director or other suitably trained person. Additional support and technical expertise will be provided by internal / external technical specialists, as required.

10.2.4 Where necessary, the OMP requirements will also be reviewed in order to ensure it continues to represent 'all appropriate measures'.

10.3 TIMESCALES

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

11 REVIEW AND AUDIT

11.1.1 The Operator will review any recorded non-conformances or complaints, including the date of the incident, who reported the incident, a description of the incident, who investigated the incident, what were the actions or outcomes of the investigation (including any mitigation measures) and whether the incident has been addressed and closed or is still ongoing.

11.1.2 Any recorded non-conformances or complaints will be reviewed each month as part of the monthly management meetings. Any complaints about amenity issues such as odour or dust will be discussed and actions suggested and agreed to ensure improvements are made and the likelihood of such incidents reduces going forward.

11.1.3 The Operator will undertake an annual audit of any recorded non-conformances or complaints. The purpose is to ensure the Site is:

- Continually improving;
- Minimising the risk of pollution incidents and preventing any significant impacts to sensitive receptors, including detriment to local amenity;
- Operated in accordance with the latest regulatory guidance;
- Meeting environmental objectives independent of the Environmental Permit.

11.1.4 This OMP will also be formally reviewed 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.

11.1.5 Any updated copy of the OMP will be submitted to NRW following review, as required. Where the Operator recognises the requirement for the immediate implementation of changes to the OMP to prevent any odorous emissions, measures will put in place to prevent any pollution or harm.

11.1.6 If, on review of the performance of the facility, the Operator and/or NRW propose to seek revision of this plan, then the following course of action will be undertaken by both parties:

3. In potentially critical circumstances where the Operator recognises the requirement for the immediate implementation of changes to the OMP to prevent odorous emissions, these changes will be discussed with NRW without delay but may be actioned by the Operator, as necessary.

4. Where the Operator proposes changes to the OMP that involve a more strategic and/or phased approach rather than a need for immediate implementation, a formal proposal will be submitted by the Operator to NRW setting out the specific issues arising from document review, and the options/issues requiring the Operator's further attention following NRW approval. NRW will review the Operator's submission/updated OMP 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.

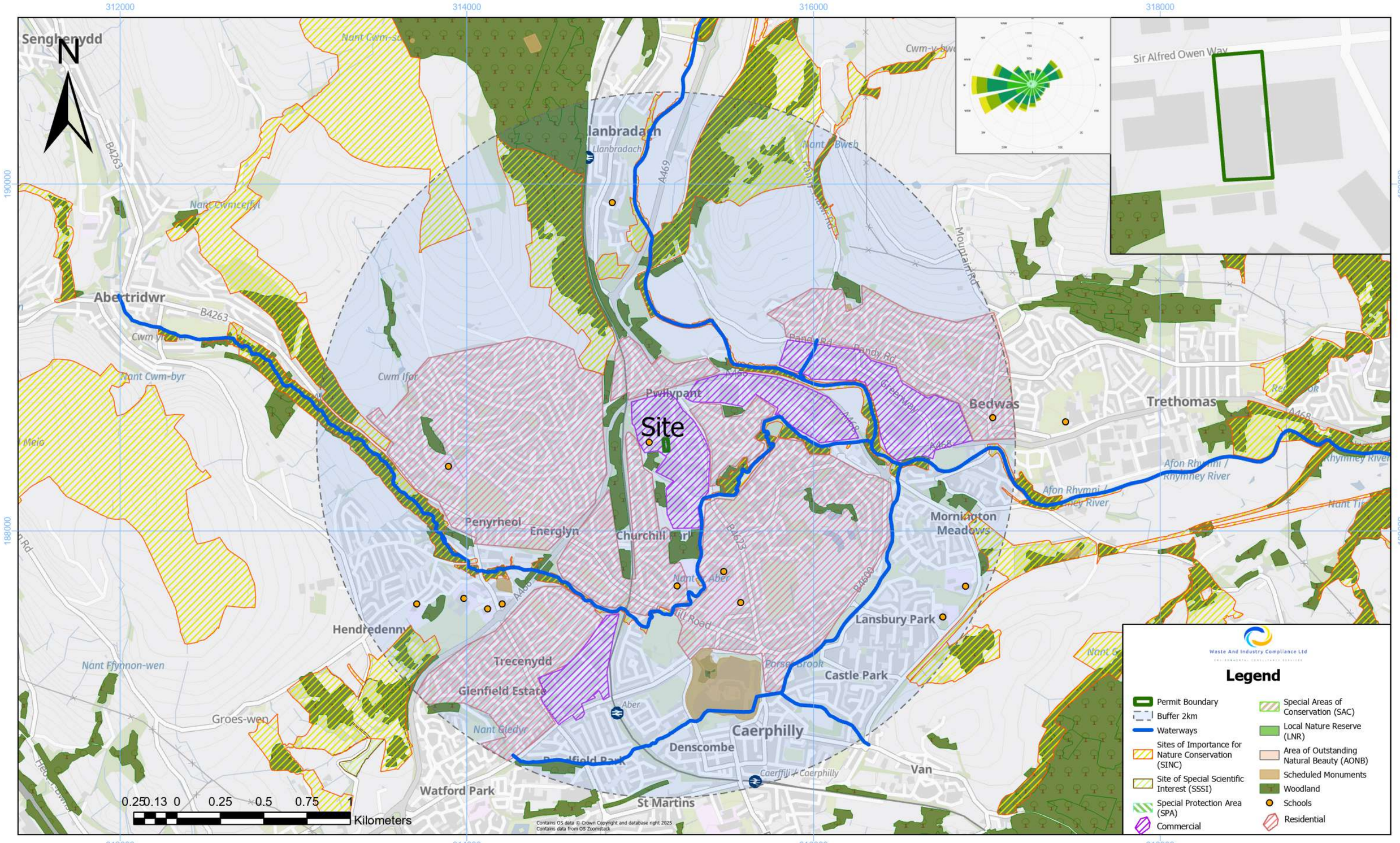
11.1.7 Where changes to the OMP are proposed by NRW, these will be discussed with the Operator setting out NRW's clear expectation from the changes, in addition to timescales for their implementation. It is recognised that these changes may range from matters that require immediate implementation to those that may be implemented over an extended timeframe. In each case, the required changes will be discussed with the Operator and an appropriate action plan agreed. The Operator 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.

12 RECORDS

12.1.1 Records will be kept in accordance with the Environmental Permit and the requirements of this OMP.

12.1.2 Records will include:

- Details recorded during the weekly site inspections by the Site Manager or, in his absence, the Operations Director;
- Copies of any completed Complaint Reporting Forms (including mitigation measures), in the event of a complaint;
- Any incidents or odour issues recorded on site at any time (i.e. not just during daily and weekly inspections).

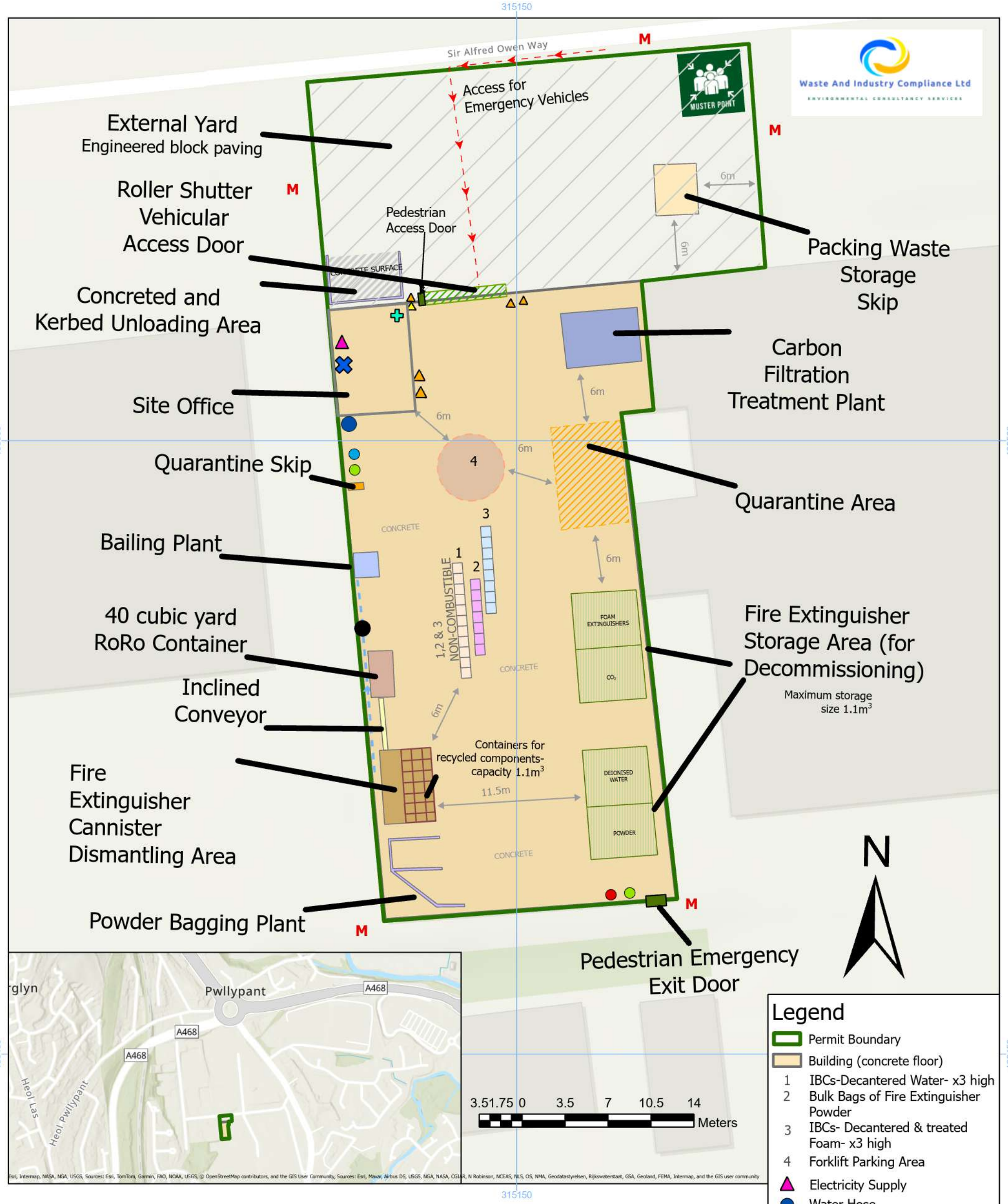


Waste And Industry Compliance Ltd

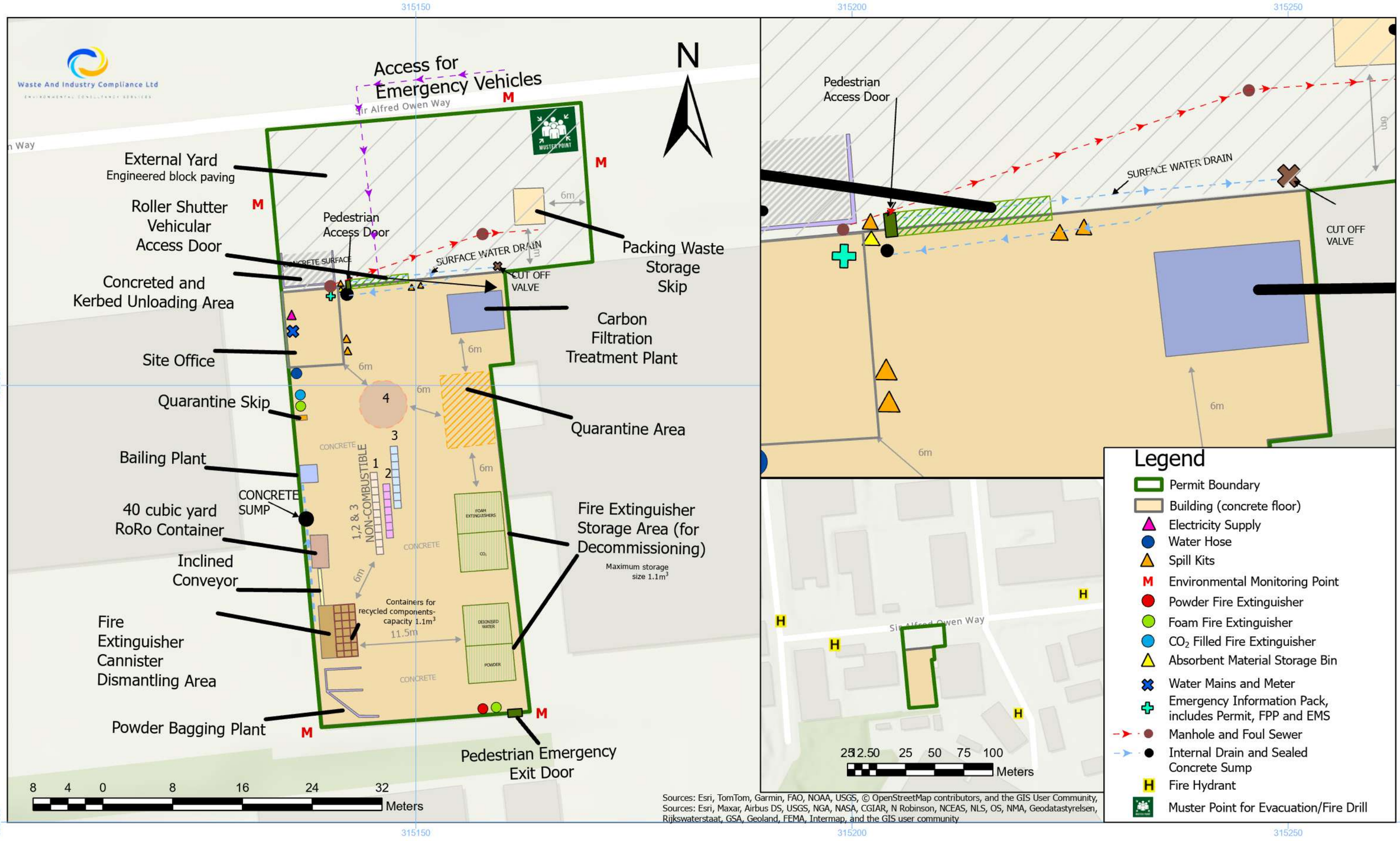
Legend

- Permit Boundary
- Buffer 2km
- Waterways
- Sites of Importance for Nature Conservation (SINC)
- Site of Special Scientific Interest (SSSI)
- Special Protection Area (SPA)
- Commercial
- Special Areas of Conservation (SAC)
- Local Nature Reserve (LNR)
- Area of Outstanding Natural Beauty (AONB)
- Scheduled Monuments
- Woodland
- Schools
- Residential

Title: Sensitive Receptors	Date: 03/04/2025	Page Size: A3	Drawing Number: CheckfireLtd-Receptors-DW02
Site Location: Unit 10B, Sir Alfred Owen Way, Pontygwindy Industrial Estate, Caerphilly, CF83 3HU	Version: FINAL	Scale: 1:20000	Grid reference: ST 15149 88490



Drawing Number: SiteLayout-DW03	Title: indicative Site Layout & Storage
Page Size: A3	Site Location: Unit 10B, Sir Alfred Owen Way, Pontygwindy Industrial Estate, Caerphilly, CF83 3HU
Date: 04/07/2025	All Dimensions to be checked on site and not scaled from this drawing. This document and its design is copyright of Waste & Compliance Ltd. and should not be reproduced in part or whole without permission. It shall be read in conjunction with accompanied consultant documents and associated project documents. This drawing is not for construction. Author: S. Barnes
Scale: 1:300	
Version: FINAL	
Grid reference: ST 15149 88490	Contains OS data © Crown copyright [OS OpenMap Local] [2025]. Emapsite ref: 869346



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Sources: Esri, Maxar, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap, and the GIS user community

Title: Site Drainage	Date: 04/07/2025	Page Size: A3	Drawing Number: CheckfireLtd-Sitedrainage-DW04
Site Location: Unit 10B, Sir Alfred Owen Way, Pontygwindy Industrial Estate, Caerphilly, CF83 3HU	Version: FINAL	Scale: 1:400	Grid reference: ST 15149 88490