PEMBROKE DOCK MATERIAL RECYCLING FACILITY

ODOUR MANAGEMENT PLAN

NOVEMBER 2015

Prepared for:

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PREPARED BY:

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APPROVED BY:

D Simons: .....

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PEMBROKE DOCK MATERIAL RECYCLING FACILITY

ODOUR MANAGEMENT PLAN

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1.0 SITE DESCRIPTION AND SPECIFIED WASTE MANAGEMENT OPERATIONS

Sundorne Products Limited operate a Material Recycling Facility (MRF) at Pembroke Dock, Pembrokeshire.

The site address is: -

Unit 41,
The Dockyard,
Pembroke Dock,
Pembrokeshire,
SA72 6TD

The hours of operation for the facility are outlined below: -

Monday – Saturday	07.30 – 19.30
Sundays and Public Holidays	09.00 – 16.00

Planning Permission with reference 13/1039/PA was granted by Pembrokeshire County Council for a **"Waste transfer station and shredding bailing facility and a reception hall"** on the 30th May 2014.

An environmental permit has also been granted for the facility and has the reference number EPR/PB3490HV.

The permit comprises a tier 3 bespoke permit for a household, commercial and industrial waste transfer station with treatment.

Treatment can be for either recovery or disposal.

All treatment and storage of waste must take place on an impermeable surface with sealed drainage to foul sewer. Storage may take place either in a building or outside.

The maximum quantity of waste that can be accepted in accordance with the environmental permit is 74,000 tonnes per year.

No hazardous wastes can be accepted at the site.

2.0 SITE LAYOUT AND EQUIPMENT

The main pieces of machinery that will be utilised on site are summarised in Table 1 below: -

Equipment	Model	Serial Number
Shredder	SATRIND Shredder	406415
Screener	Not yet purchased	
Baler	Cross Wrap CK TR121/006	1103817

2.1 Accepted Waste Types

Only waste categorised under Environmental Waste Code 20 03 01 can currently be accepted at the Pembroke Dock Materials Recycling Facility. The description of this waste type is given below: -

20 03 01 - Mixed municipal waste (consisting of general 'black bag' waste or Household Waste Recycling Centre residual waste only).

The maximum amount of mixed municipal waste that can be accepted at the site is 74,000 tonnes per year.

3.0 PUBLISHED GUIDANCE

This Odour Management Plan has been prepared in consideration of the following guidance documents: -

- NRW – Odour Management Plans for waste handling facilities;
- H4 – Horizontal Odour Guidance.

This management plan is based on the Source – Pathway – Receptor model which aims to control risks at source by implementing effective and robust control measures.

It is acknowledged in guidance notes that the assessment and control of odour can be difficult due to dispersal and the episodic nature of odour events. Assessments are therefore usually based on conservative worst case scenarios and are not a reflection of the preventative measures in place at the site.

The guidance states that the Best Available Technology (BAT) is often site-specific and can be determined by the controls necessary to meet benchmark odour concentrations at ground level at sensitive receptors.

3.1 Objectives

The aim of this document is to provide a summary of appropriate physical and management controls that will be employed to minimise the odour release at the Pembroke Dock MRF Site. It provides a site specific assessment of the potential sources of odour, the pathways odour can take from the site and the receptors which could be impacted.

Where a source or pathway has been identified, mitigation measures to prevent or control fugitive odour emissions are discussed.

The objective of the plan is to ensure odorous sources are identified and intervention takes place at the earliest opportunity to prevent odours emissions or complaints.

4.0 PROCESSING

4.1 Process Overview

Details of the processing of untreated material carried out at Pembroke Dock MRF are outlined below. Drawing 240-01-04.D01 in Appendix A shows a plan of the MRF facility.

4.1.1 Delivery and Removal

During site opening hours, waste will be delivered to the site by residual waste collection vehicles and bulk transport vehicles. Fines and wastes will exit via suitably enclosed transport vehicles.

A waste acceptance procedure is in place. Incoming material is reviewed by the site supervisor prior to acceptance. Loads with an unacceptable odour are rejected and recorded in the site diary. Volumes of more odorous wastes will be limited on site as much as possible (see characterisation in 4.2.1).

Upon entering the site, all vehicles will be weighed at the weighbridge and then be directed to unload waste in the enclosed reception hall within the waste reception building.

Safe systems of work will be in place to ensure that loading and unloading of waste into and out of the processing plant is undertaken in an appropriate manner to minimise risk of accident or incident.

4.1.2 Treatment

All waste accepted at the site will be treated in preparation for onward transport to off-site recycling and incineration facilities.

This will involve shredding, screening, separation and baling processes.

Selected recyclates will be extracted from the waste stream in line with the Waste Framework Directive.

Recyclates will be stored separately within containers before being transported for re-processing.

Dusts and fines resulting from processing techniques entering the working environment will be minimised through the use of dust and fines collection systems incorporated within treatment equipment.

Additional dust suppression will be implemented by damping down where deemed necessary. All processing will take place within the waste reception building, and therefore, release of dust and fines to the external environment will be minimal.

A de-odourising agent will be sprayed onto the waste prior to baling to minimise odour generation.

4.2 Source Pathway Receptor

4.2.1 Odour Source Characterisation

Following review of the operational process undertaken at the Pembroke Dock MRF facility and the wastes which can be accepted at the site, the following source of odour is considered to be applicable for the Pembroke Dock facility: -

- Odorous emissions from waste at the delivery stage and odorous waste sources;
- Odours generated from the processing of untreated wastes.

All waste sources will be characterised by the operator, with more odorous material prioritised for processing.

Containment at source via enclosure within the site building and use of the bale material/de-odouriser is the primary method for reducing and preventing release of odorous emissions.

4.2.2 Odour Pathway Characterisation

Due to the unprocessed material being unloaded, treated and baled in an enclosed building, the potential for odour release would be via roof vents and doorways when open.

The principal mechanism for the transit of odorous emissions from the site operations to adjacent sensitive receptors is via ambient air. The distance any emissions are carried and the degree of dispersion will be determined by the meteorological conditions and topography.

Any odour emissions will be influenced by the prevailing wind direction at the site, which is from the west.

Wind velocity will affect the distance an odour emission will travel. However, increased wind speed could also beneficially improve dispersal. The receptors that are closest to the installation however, remain at the highest risk of adverse impact.

To increase the pathway between source and receptor, odorous material will be stored at locations furthest from sensitive receptors.

The volumes of odorous waste kept on site at any one time will be restricted as far as practicable.

4.2.3 Odour Receptor Characterisation

Locally sensitive receptors can be characterised as follows: -

- Settlement of Neyland – located 0.8 miles to the North across Milford Haven estuary;
- Settlement of Pembroke Dock – located 0.2 miles to the East;
- South Pembrokeshire Hospital – located 0.15 miles to the South;
- Site operational staff;
- Surrounding industrial estate users;
- Residents of Llanstadwell and Neyland and recreational users of the Haven to the north of the site;
- Public rights of way;
- Locally sensitive sites.

5.0 INTERNAL AND EXTERNAL STORAGE

5.1 Storage Overview

The storage locations are outlined on drawing 240-02-03.d01 in Appendix A.

Odorous waste will be stored at locations furthest from receptors first, the order of which is outlined on drawing 240-02-03.d01.

There is sufficient external storage capacity for the storage of 4,500 tonnes of baled and wrapped waste. As part of the lease agreement with Milford Haven Port Authority, baled waste will not be stored externally on site for longer than six weeks at any time.

Baled waste will be stored in accordance with TGN7.1 to reduce the risk of fire on site.

Baled and wrapped waste will be transferred in an appropriate manner to a dedicated external storage area prior to onward transportation to further treatment / recovery facilities.

Processed waste will be baled and wrapped in plastic film to ensure environmental protection during transportation.

An inspection of stored wastes for pest infestations or damage of wrapping will be carried out on a daily basis by the site supervisor, and shall be recorded in the site diary.

On detection (or notification) of damage to bale wrapping, immediate remedial action shall be taken, appropriate measures will be undertaken to secure the bale.

The incident and the remedial action shall be recorded in the site diary.

5.2 Source Pathway Receptor

5.2.1 Odour Source Characterisation

Following review of the storage of processed waste at Pembroke Dock MRF facility, the following source of odour is considered to be applicable for the Pembroke Dock facility: -

- Odours generated storage of waste prior to onward transport.

Containment at source will also be seen as the primary method for reducing the risk of release of fugitive odour emissions.

5.2.2 Odour Pathway Characterisation

The pathway described in section 4.2.2 is also applicable for the odours generated from the storage of waste.

Processed waste with a particularly high odour will be stored in storage areas located furthest from sensitive receptors.

5.2.3 Odour Receptor Characterisation

Locally sensitive receptors can be characterised as the same as those outlined in section 4.2.3 for odours generated from the processing of untreated waste.

6.0 CONTROL MEASURES

The Site Manager will be responsible for ensuring the potential for odour generation at the facility is monitored and managed effectively.

Prevention will be viewed as the most effective means of controlling odour before any impact occurs. The Source – Pathway – Receptor model outlined in the preceding sections has identified two potential sources from the site which could impact on nearby sensitive receptors.

6.1 Odours Generated From the Processing of Untreated Wastes

Odours associated with the untreated material will be controlled to an acceptable level by ensuring the following measures are implemented: -

- Wastes will be delivered to the site in appropriately covered or sealed vehicles;
- A site operator will check incoming waste prior to acceptance. If the waste has an unacceptably elevated odour, then this load will be rejected, and this will be recorded in the site diary. Waste acceptance procedure is key as it represents the earliest opportunity for the intervention of odour;
- All unloading and treatment of unprocessed material is undertaken within the site building;
- The processing building has PVC flaps on the doors, which will limit the potential for released of fugitive odour emissions;
- The maximum quantity of unprocessed waste permitted to be stored on the site at any one time (570 Tonnes), as outlined in the Environmental Permit and the Environmental Management System will not be exceeded;
- All unprocessed material delivered to the site will be treated as soon as possible, but within a maximum of 48 hours, as once the waste is baled the potential for odour generation is reduced;
- During processing, organic materials and fines will be removed, which are the primary odour generating fraction of the waste. Machinery will be checked weekly to ensure that their efficiency at removing these fractions remains within acceptable limits;
- Prior to baling, the waste will be sprayed with a de-odourising agent to reduce the potential for odour generation;
- The waste will be then be baled in a minimum of 8-10 layers of tough waterproof baling plastic. The baling material will limit water ingress which could lead to elevated odour generation, while limiting odour emissions themselves from the bales;
- Odour suppression is also utilised in the processing building, further reducing the potential for the release of fugitive odour emissions;
- The MRF building is cleaned thoroughly on a daily basis, with no waste stored within the building overnight;
- Provision will be made to undertake a thorough clean down of all plant and machinery annually.

6.2 Odours From Storage of Baled Waste Prior to Onward Transport

Odours associated with the treated baled waste will be controlled to an acceptable level by ensuring the following measures are implemented: -

- The maximum quantity of baled waste permitted to be stored at the site at any one time (4500 Tonnes), as outlined in the Environmental Permit and the Environmental Management System will not be exceeded;

- Baled waste will not be stored at the site for longer than 6 weeks. Where this timeline cannot be achieved, the procedure outlined in section 4.6 will be employed immediately;

- The Site Manager will assess the risk of each of its sources of waste, which will include proposals for processing waste from more odorous sources first, and storing it furthest from receptors once processed. This will extend the pathway length for any odour generated. Drawing 240-02-03.d01 in Appendix A displays the various storage areas, and the order in which they will be used;

- Baled wastes will be regularly inspected for damage or pest infestation as outlined in the Environmental Management system for the site. The inspections will ensure that bale integrity is not compromised which could increase the potential for odour emissions. Where damage to a bale identified, the wrapping layer will be repaired if needed;

- Daily and weekly site inspection checklists are in place, which include subjective assessments by the site manager regarding any odour generation from the facility. Any observations are noted in the site diary and checklists along with the meteorological data for each day;

- During periods of hot weather, the site manager will attempt to limit as far practicable, the amount of baled waste stored at the site;

- Provision will be made to clear each storage area and undertake a thorough clean down at a suitable frequency, no less than annually. Clean downs of storage areas are likely to be undertaken on a rotational basis.

7.0 ODOUR MONITORING

Odour monitoring is the primary mechanism by which any impact from the facility will be quantified and recorded.

The Site Manager will be responsible for ensuring that monitoring is conducted at the facility, identifying any sources of odour and to establish whether any odours are discernible.

Monitoring will be conducted a minimum of twice per week on a Monday and Thursday morning. All odour monitoring will start at the upwind location on the day as determined by prevailing wind conditions.

Monitoring will comprise sniff tests to be undertaken along the site perimeter and at offsite at nearby sensitive receptors, the locations of which are shown in drawing 240-02-03.d01 included in Appendix A.

All off-site olfactory monitoring will also be carried out with reference to the protocol in Appendix 1 of the H4 Technical Guidance Note, with an odour assessment form being completed. Results will also be recorded in the daily site checklist and odour diary, copies of which are included in Appendix B.

The Daily and weekly site checklists will also include process monitoring. Checks will ensure that the organic components and fines are being adequately removed from the waste and that the waste is being de-odourised and baled correctly.

7.1 Public Engagement

The operator will undertake regular, planned engagement with nearby sensitive receptors. The frequency of contact will be a least monthly, including visits or phone calls, the date and time of which will be recorded in the site diary.

These meetings provide clear lines of communication with the operator to enable swift identification of any issues, commencement of investigations and resolution where required, prior to the need to register a complaint.

The operator will keep sensitive receptors informed of any operations or operational periods which could lead to elevated levels of odour.

Nearby receptors will be provided with a direct contact number which they can ring to discuss any issues. Alternatively, any issues can be discussed with the operator on site by visiting the weighbridge.

7.2 Complaints Management and Reporting

Following the receipt of any complaints, the Site Manager will complete an Odour Complaint Form and implement the site Odour Investigation Plan.

A copy of the odour complaint form is included in Appendix C. The site odour investigation plan is discussed below.

7.2.1 Odour Investigation Plan

Once a complaint has been made and received an employee from the Withyhedge waste site will be sent out to detect odours at each of the 9 regular monitoring points as shown in drawing 240-02-03.d01.

The reason an employee from Withyhedge will be utilised is to limit the possibility that the assessor has become acclimatised to any odours generated by the Pembroke Dock site.

The odour diary utilised for regular monitoring will be filled in each point.

Where unacceptable levels of odour emissions from the facility are identified, potential corrective and preventative actions will be investigated and implemented where possible.

NRW will be notified of all complaints received and provided with copies of the Investigation forms.

7.3 Contingency Control Measures in the Event of Incidents or Emergencies

The primary incidents that could impact odour at the site are outlined below: -

- Loss of process control;
- Plant Breakdown;
- Boat delayed resulting in material requiring longer storage period on site.

7.3.1 Loss of Process Control

The machinery at the site could experience a malfunction which results in a loss of process control.

Daily and weekly inspections will be undertaken at the site to ensure that machinery is running correctly. All machinery will be maintained in accordance with the manufacturer's guidelines.

Site machinery is also fitted with emergency stop features that can be activated in case of an incident or emergency. Furthermore, as the waste requires manually loading into process machinery, the supply of waste into the machines can be stopped quickly in the event of an incident or emergency.

The risk of loss of process control resulting in an odour impact is therefore low, with any impact likely to be minor and short term.

7.3.3 Plant Breakdown

The machinery at the site could break down resulting in the need to halt processing of waste at the site.

Daily and weekly inspections will be undertaken at the site to ensure that machinery is running correctly. All machinery will be maintained in accordance with the manufacturer's guidelines.

Where machinery is unlikely to be fixed within an appropriate timeframe, waste deliveries to the site will be diverted.

Where unprocessed waste will not be able to be treated within 48 hours, daily odour monitoring will be conducted and the site manager will inform local sensitive receptors of the situation.

If 48 hours after the initial breakdown, the machinery has not been repaired, Mobile plant will be brought in if necessary to continue processing the waste while the machinery is repaired.

If the waste cannot be processed, then the Site Manager will arrange for the unprocessed material to be collected and taken from the site.

NRW will be informed of any process machinery breakdowns and kept informed daily of monitoring results, any complaints received and progress with fixing the machinery.

7.3.4 Boat Delayed Resulting in Material Requiring Longer Storage Period on Site

Where the boat collecting the baled waste is delayed, or where otherwise the time baled waste is required to be stored at the site for longer than 6 weeks, NRW will be informed.

The Site manager will commence daily odour monitoring at the receptors identified in drawing 240-02-03.d01 and will inform local sensitive receptors of the situation. Daily monitoring will continue for the duration that bales older than 6 weeks are kept on site.

Older baled wastes will be relocated within the site to storage areas furthest from the sensitive receptors to extend the odour pathway length. De-odourising agents will be employed where possible.

8.0 AUDIT PROCEDURE

The Site Manager is responsible for conducting a review at least once a year of the odour management plan document, to ensure the current control measures and monitoring outlined are adequately managed and remain appropriate.

Additional control measures will be added as required.

The Odour Management Plan will be updated to incorporate any changes made.

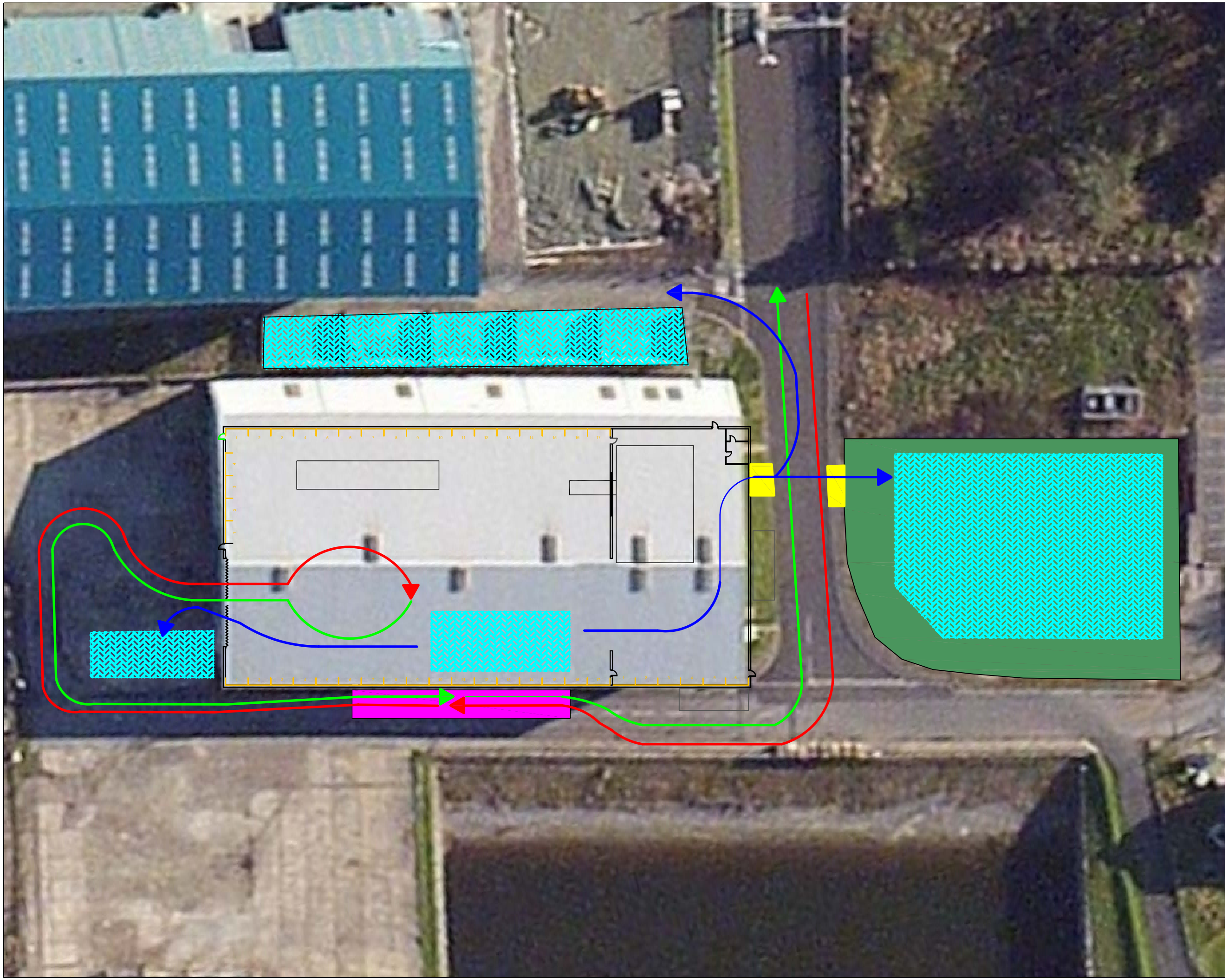
The audit will also include the review of the plant and maintenance schedule along with records of all complaints received and corrective actions taken since the previous audit.

Changes that alter site processes, machinery types or could increase the environmental risk of the site will be discussed with Natural Resources Wales prior to implementation and updating of the document.

A copy of an updated Odour Management Plan will be provided to NRW for approval.

APPENDIX A

Drawings



Notes: A3

Job:
240-01-04

Title:
Pembroke Dock Traffic Management Plan

Date:	March 2015
Scale:	NTS
Drawn by:	DS
Checked by:	SW

ExCAL Limited
ExCAL House,
Capel Hendre Ind. Est.,
Ammanford,
Carmarthenshire,
SA18 3SJ
Tel: 01269 831606
Fax: 01269 841867
Website: www.excaluk.com
E-mail: info@excaluk.com

Drawing No:	240-01-04.d02
Revision No:	**Date:**

Notes: A3

Site

1 Odour Monitoring Location

Job:
240-02-03

Title:
Odour Monitoring Location Plan

Date:	August 2015
Scale:	NTS
Drawn by:	DS
Checked by:	SW

ExCAL House,
Capel Hendre Ind. Est.,
Ammanford,
Carmarthenshire,
SA18 3SJ
Tel: 01269 831606
Fax: 01269 841867
Website: www.excaluk.com
E-mail: info@excaluk.com

Drawing No: 240-02-03.D01

Revision No: **Date:**

Notes: A3

1 – 4 Storage order

Tarmac

Weighbridge

Bale Storage

Job:
Odour Management Plan

Title:
Storage locations

Date:	November 2015
Scale:	NTS
Drawn by:	CG
Checked by:	SW

ExCAL Limited
ExCAL House,
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Website: www.excaluk.com
E-mail: info@excaluk.com

Drawing No:	240-02-03.d01
Revision No:	**Date:**

APPENDIX B

Site Inspection Checklist Templates

Daily Diary

PotterGroup

Site:	By:

Day:	Date:	Weather:

Staffing levels

Staff present	
No. agency staff	
Appointed person (1st aid)	
Team Leader	

COTC holder on site

Initials			
Time in			
Time out			

Daily checks-any issues e.g. broken/damaged signs, damage, etc.

	Reported
	Y/N
	Y/N
	Y/N
	Y/N
	Y/N

Site inspections/audits (EA,CCC etc.)

Type of inspection	Name	Time in	Time out	Comments	Reported
					Y/N
					Y/N
					Y/N
					Y/N

Accidents/emergencies

Compliments/comments/complaints

Contractors on site-maintenance, repairs, etc.

Further comments

Daily/Weekly Site Inspection

Site: Pembroke Dock **Week Commencing:**

TCM Minimum Attendance Required: **TCM Attendance (hours/week):**

Inspected items	Frequency	Mon	Tues	Wed	Thur	Fri	Sat	Sun
Person Completing the checklist	Daily Initials							
All Facilities								
Condition of site ID Board & signs	weekly							
Condition of Access, site road & hardstanding	weekly							
Condition of Waste reception area & Operational area	weekly							
Site building & welfare	weekly							
Waste type, Quantities & storage	daily							
Waste acceptance/inspection & Duty of care	daily							
Condition of Fencing, Gates & security	daily							
Condition of all waste containers, on shared site this includes any containers left by logistics	daily							
Condition of lighting system	daily							
Condition of fuel & storage tanks, inc containment system	daily							
Other liquid storage: Availability of spillage kit	daily							
Fire; Availability of emergency equipment (inc vehicles)	daily							
Surface water Management e.g. Drainage system	daily							
Control of litter inc fly tipping	daily							
Control of odour – morning check If no odour x if odour and investigate with details on reverse	Once/twice							
ADDITIONAL CHECK TO BE IMPLEMENTED IF ODOUR COMPLAINT RECEIVED AND CONTINUED FOR 1 MONTH AFTER LAST COMPLAINT – control odour – afternoon check if no odour x if odour and investigate with details in reverse	Daily as Appropriate							
Odour suppression system operating satisfactorily	daily							
Control of dust	daily							
Control of noise	daily							
Control of birds & rats	daily							
Control of flies (*record spraying and any problem load on reverse)	daily							
Wind direction	daily							
Have any inspections occurred (e.g. regulator) or samples taken (e.g. discharge monitoring) if regulator scored received	As inspected							

Daily/Weekly Site Inspection

Site: Pembroke Dock **Week Commencing:**

Monday
Tuesday
Wednesday
Thursday
Friday
Saturday
Sunday
Comments

CoTC Signature:_____ Date:_____

Odour Diary Unit 41									Sheet No
Name of person doing checks:				Date:					
Time arrived at points:									
Location of odour; if not at above address:	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**
Time spent at location: (1-5 minutes)									
Weather conditions (dry, rain, fog, snow etc.):									
Temperature (very warm, warm, mild, cold or degrees if know):									
Wind strength (none, light steady, strong, gusting):									
Wind direction (e.g. from NE):									
What does it smell like? How unpleasant is it? Do you consider this smell as offensive?									
Intensity – how strong was it? (see below 1-5)									
How long did go on for? (time)									
Was it constant or intermittent in this period:									
What do believe the source/cause to be?									
Any actions taken or other comments:									

Intensity

0 No odour
1 Vey faint odour
2 Faint odour
3 Distinct odour
4 Strong Odour
5 Very strong odour
6 Extremely strong odour

Time

1 - 1 minute
2 – 2 minutes
3 – 3 minutes
4 – 4 minutes
5 – 5 minutes

APPENDIX C

Odour Complaint Form

Odour Complaint Report Form

Time and date of complaint:	Name and address of complainant:
Telephone number of complainant:	

Date of odour:	
Time of odour:	
Location of odour, if not at above address:	
Weather conditions (i.e., dry, rain, fog, snow):	
Temperature (very warm, warm, mild, cold or degrees if known):	
Wind strength (none, light, steady, strong, gusting):	
Wind direction (eg from NE):	
Complainant's description of odour: o What does it smell like?	
o Intensity (see below):	
o Duration (time):	
o Constant or intermittent in this period:	
o Does the complainant have any other comments about the odour?	
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure):	
Any other relevant information:	
Do you accept that odour likely to be from your activities?	
What was happening on site at the time the odour occurred?	
Operating conditions at time the odour occurred (eg flow rate, pressure at inlet and pressure at outlet):	
Actions taken:	

Form completed by:	Date	Signed

Intensity

0 No odour
1 Very faint odour
2 Faint odour
3 Distinct odour
4 Strong odour
5 Very strong odour
6 Extremely strong odour