



DPS Process Solutions Limited

Caldicot R&D Facility

Environmental Permit Application

Odour Management Plan

August 2017



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Document Control

Project: Caldicot Business Park
Client: DPS Process Solutions Limited
Job Number: A102691
File Origin: \\SOUTHAMPTON14\new-data\S52\Data\Projects\DPS Process Solutions Limited (D16026)\A102691 (Caldecotte Business Park)\Reports

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Issue	Date	Status
1	02/08/2017	Final



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Drawings

J17002-DPSPS-R-XD-0002 - Layout Plan Severnbridge Unit 7



1.0 Introduction

1.1 Report Context

This Odour Management Plan (OMP) has been prepared by WYG, on behalf of the operator, DPS Process Solutions Limited (DPS), as part of the management of the proposed waste and storage facility at Severn Bridge Industrial Estate in Caldicot, Monmouthshire. This document has been prepared with regards to the relevant Natural Resources Wales (NRW) guidance as detailed in the document.

This report assesses the risk of odour at the facility and provides details of the odour management procedures that will be in place to control any odorous emissions at the facility. The purpose to this is to ensure that the risk of adverse odour impacts on potential nearby receptors is minimised.

DPS wish to obtain a bespoke Environmental Permit to allow the treatment and storage of waste at the site. Waste treatment activities will comprise manual sorting, separation, screening, baling, shredding, crushing or compaction into different components.

1.2 Objectives of the Odour Management Plan

1.2.1 This document has been prepared in accordance with NRW's guidance note 'H4 Odour Management'. It is specified in the H4 guidance that the operator must 'employ the appropriate measures necessary to prevent the odour pollution or minimise it when prevention is not practicable'.

1.2.2 As required by the H4 guidance document, the OMP seeks to:-

- Employ appropriate methods, including monitoring and contingencies, to control and minimise odour pollution;
- Prevent unacceptable levels of odour at all times; and
- Reduce the risk of odour releasing incidents or accidents by anticipating them and planning accordingly.

1.2.3 To meet the above objectives, this OMP considers the potential sources, releases and impacts of odour pollution and identifies appropriate opportunities for odour management.



2.0 Potential Sources of Odour

2.1 Overview of Site Activities

DPS seeks to operate a waste treatment and storage facility. The site will be used to separate combustible materials from specified waste streams with rejected materials to be sent off site for recovery. The remaining combustible fractions will be stored on site prior to further treatment within a separate gasification/pyrolysis activity.

As specified in the Operating Techniques (Appendix B of the main application), waste treatment activities on site will comprise manual sorting, separation, screening, baling, shredding, crushing or compaction into different components.

2.2 Inventory of Potentially Odorous Waste Streams

2.2.1 The proposed waste types for the facility are provided in the Operating Techniques (Appendix B of the main application).

2.2.2 Based on these waste codes, the types of potentially odorous wastes received at the site are likely to consist of the following materials:

- Wood; and
- Refuse derived fuel.

2.2.3 The Chartered Institute of Wastes Management (CIWM) and the Waste Resources Action Programme (WRAP) commissioned a review that considered the odour generation potential of stored residual municipal solid wastes (MSW). The review indicates that composition of odorous chemicals change with time, some diminish whilst others increase, however overall it is recognised that the longer the storage time the greater the odour generation potential. In addition, it is also understood that the warmer the waste the greater the odour production potential. The volume of waste stored and the depth of waste (which may result in anaerobic conditions and heat) are all factors that influence odour generation. These issues are all addressed in this report.

2.2.4 The components of odorous compounds in the wastes are likely to vary depending on proportion of the incoming wastes accepted. Odour tends to consist of a complex mix of chemicals in gaseous



form, as described above, wastes of the nature to be accepted exhibit the following typical odours:-

- VOC's including chloro-organics;
- Hydrogen sulphide (rotten eggs);
- Mercaptans (rotten vegetation e.g. cabbage); and
- Amines (fishy smell).

2.2.5 The age of waste received and storage temperature and storage and treatment options will influence odour type and generation. It is recognised that in general increased odours are linked to longer storage of municipal type waste and movement of wastes in stockpiles which in turn can release odour. However only a minority of odorous compounds appear to increase consistently with longer storage, therefore targeting particular odorous compounds is difficult. It is considered that actions aimed at reducing storage times, limiting stockpile sizes, minimising temperature, limiting evaporative losses and controlling odorous inputs are preferable and more practical control methods.

2.2.6 It is considered that actions aimed at reducing storage times, limiting stockpile sizes, minimising temperature, limiting evaporative losses and controlling odorous inputs are preferable and more practical control methods

2.3 Waste Reception

2.3.1 Incoming waste delivery vehicles will enter the site and report to the weighbridge office. Each incoming delivery of waste will be checked by the weighbridge office staff to confirm that it complies with the list of permitted wastes specified in the Environmental Permit. The vehicles will be weighed and then directed to the waste reception area where the waste will be unloaded.

2.4 Waste Storage

2.4.1 Wastes will be stored in designated bays as shown on Drawing Number J17002-DPSPS-R-XD-0002. This area is located within a building and benefits from an impermeable surface with a sealed drainage system. The building doors will be kept closed at all times unless vehicles and mobile plant are accessing the building. The building will also operate under a slight negative pressure to ensure that odours do not escape when the doors are opened.

2.4.2 The facility will have a storage capacity for 500 tonnes of pre-treated material and 500 tonnes of



segregated material post treatment.

2.5 Waste Processing

- 2.5.1 Wastes stored in the storage bays will be fed into the waste hopper where it will be transferred to the primary screener. At this stage, the material is segregated between 0-30mm and +30mm. Fractions that are greater than 30mm will be transferred to an overband magnet and an eddy current separator in order to recover metals. The residual material that's left following this process is subsequently shredded to reduce the fraction size to 30mm.
- 2.5.2 Once shredded, this material is discharged back in to the 0-30mm fraction that was processed from the primary screener. This material is then processed through a secondary screener in order to remove fractions measuring 0-3mm. These fine fractions are subsequently processed through an overband magnet and lights blower in order to recover residual metals.
- 2.5.3 Fractions measuring from 3-30mm is transferred to an eddy current separator, equipped with a vibrating feeder and a drum magnet, in order to recover metals.
- 2.5.4 The residual material from the eddy current separator is transferred to an enclosed blower where the heavy, inert fraction is segregated from the lighter fraction. The lighter fraction is subsequently stored within a lights storage bunker (as shown in Drawing Number J17002-DPSPS-R-XD-0002) where it will be stored prior to further treatment via pyrolysis.



3.0 Odour Pathways

3.1 Odour Pathway Characterisation

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

- Source related pathways;
- Meteorological conditions; and
- Topography.

3.2 Source Related Pathways

3.2.1 The pathway an odorous emission takes from a site may depend on the specific source term and/or the location it arises from. The nature of the source related pathway could also influence the scale of the resulting impact on a sensitive receptor.

3.2.2 Odours emitted from the sources identified above are emitted to air and have the potential to be conveyed to the nearby receptors via transfer through the atmosphere.

3.2.3 The pathway an odorous emission takes from a site may depend on the specific source term and/or location it arises from. The nature of the source related pathway could also influence the scale of impact on a sensitive receptor.

3.3 Meteorological Conditions

Wind Direction

3.3.1 The main controlling factor in determining the pathway of odour is the ambient meteorological conditions. This is fundamental to the transportation of odour to sensitive receptors.

3.3.2 The prevailing wind direction will determine which receptors will be affected and at what frequency meteorological data has been used from the Severn Beach station, located approximately 6km south east from the application site (which is considered to be representative of conditions within the vicinity of the application site). The wind rose data from this station has shown that the prevailing year round



wind direction in the local area is west south west. The wind distribution as shown on www.windfinder.com is shown in Appendix A.

Wind Velocity

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

Air Temperature

- 3.3.4 Warm air may carry odours upwards by convection for their dispersal away from the site. However, warm weather will encourage the onset of biodegradation of exposed or temporarily stored wastes and therefore increase odour potential. Therefore, in the summer months the risk of odour emissions is greater and this must be taken into account in the site procedures.

Adverse Weather Conditions

- 3.3.5 Unusual weather conditions, such as a heat wave, may increase the risk of odour emissions from the site. Site staff will be vigilant to unusual trends in the meteorological data or forecasts which may indicate strong winds or extremes of temperate which may cause a potential problem.

3.4 Topography

- 3.4.1 The topography of the site and the surrounding area can influence the potential dispersion of odour emissions. The immediate surroundings of the site comprise an industrial setting to the west, south and north west of the site. Beyond the industrial estate to the west is the residential are of Deepweir. To the east is a railway line which runs in a north-south direction and is bounded on both sides by woodland.



4.0 Report Context

4.1 Identification of sensitive receptors

4.1.1 Locally sensitive receptors can be characterised as follows:

- Domestic dwellings or workplaces;
- Public rights of ways; and
- Locally sensitive sites.

4.1.2 The potential receptors within 1km of the site's environmental permit boundary have been identified in Table 1.

4.1.3 According to the wind rose data for the area, the prevailing wind direction in the local area is west south west as shown in Appendix A. As such, it is considered that the key potentially sensitive receptors are the Archbishops Rowan Williams Church in Wales Primary School, located north east of the site and the residential area that is located approximately 80m east of the application site.

Table 1: Location of potentially sensitive receptors in relation to the proposed waste operation

Receptor	Direction from Operational Area	Minimum Distance from proposed permit boundary (approx.) (m)
Designated ecological habitats e.g. Ramsars, SAC, SPA, SSSI		
Severn Estuary (Wales) Ramsar, SPA, SAC, SSSI	S	608
Gwent Levels – Magor and Undy SSSI	SW	360
Other Designations e.g. National Parks, AONB, World Heritage Sites		
N/A		
Historical buildings/listed buildings/archaeological sites		
Listed Buildings		
Castle Lodge	NW	490
Caldicot Castle	NW	690
Ye Olde Tippling Philosopher P.H	W	665
Prospect House	W	895
Court House	NW	990
The Old Rectory	NE	400
Garden Walls of underwood	NE	430
Manor Farmhouse and Manor Cottage	NE	445
Portskewett House	NE	615
Portskewett War Memorial	NE	565
Cross in Churchyard of the Church of St Mary	NE	525
Church of St Mary	NE	515



Old cottage/storehouse in churchyard of church of St Mary	E	525
Schools/Hospitals/Shops		
The Archbishops Rowan Williams Church in Wales Primary School	NE	675
Commercial and Industrial Premises		
Severn Bridge Industrial Estate	N, W, S	Adjacent
Old Pill Farm Industrial Estate	SW	445
Pill Farm Industrial Estate	SW	445
Castlegate Business Park	NW	195
Domestic Dwellings		
Residential area to the west of the Severn Bridge Industrial Estate	W	450
Residential area to the east of the application site	E	80
Highway or Minor Roads		
Caldicot By-pass (B4245)	W	515
Caldicot Road	N	60
Crick Road	NE	410
Symondscliff Way	W	>10
Second Severn Crossing (M4)	S	630
Sensitive Land Uses e.g. farmland, allotments, commercial fish farms		
N/A		
Surface Water		
Nedern Brook	SW	315
Other		
Caldicot Castle and Country Park	NW	645



5.0 Potential Impacts

5.1 Impacts Associated with Odour

5.1.1 In order to minimise the impacts of odour pollution, it is necessary to have an understanding of the surrounding community and how odour emissions could affect the people living nearby.

5.1.2 The potential receptors are identified in Section 4 (above). The potential impacts of odour emissions are as follows:

- Damage to local amenity – members of the public may choose not to visit areas that they perceive are affected by odour emissions;
- Damage to human health – some members of the public may be severely affected by odour emissions due to existing health conditions or enhanced sensitivity; and
- Nuisance – members of the public may perceive odour emissions as a nuisance.



6.0 Odour Management

6.1 Odour Control Measures

- 6.1.1 The H4 guidance requires that an OMP provides specific details regarding the proposed control measures that will be in place to control odour.
- 6.1.2 There will be specific control measures in place to minimise the risk of the emission of odours beyond the site boundary. These measures, which relate to the operation of the site during normal conditions, have been specified in relation to each potential odour source and are described below.
- 6.1.3 For details relating to the control of odour during abnormal conditions, see Section 8 of this OMP.

Acceptance of Potentially Odour Wastes

- 6.1.4 Vehicles will be required to arrive at the site in a clean state and all waste delivery vehicles will be covered. This requirement will be communicated to all potential waste carriers and producers in advance of a delivery or the commencement of a contract and any instances where this is not adhered to will be reported to the carrier/producer with information reiterating the requirement. If vehicles continue to arrive which do not comply with this requirement, DPS may refuse to accept waste from that carrier/producer.
- 6.1.5 The access roads will be inspected on a daily basis as part of the routine site inspections and cleaning or sweeping of the access roads will be instigated to prevent track out of any spilled materials.
- 6.1.6 All incoming loads will be inspected upon arrival at the site reception area and if site operatives determine that a load is partially odorous, they will alert the Site Manager or Site Supervisor who will inspect the load and may decide not to accept the waste onto the site. The decision to accept or reject the waste will be at the discretion of the Site Manager or Supervisor only. This will be recorded in the waste acceptance records.
- 6.1.7 The site has limited storage capacity and the operator can easily monitor the volumes of waste that are present on site at all times and the site staff will therefore know if the site has sufficient capacity to accept any incoming waste while remaining in compliance with the conditions of the environmental



permit. If the site does not have capacity the waste will not be accepted, this will include any scheduled plant outages for maintenance which may temporarily reduce the site's capacity.

- 6.1.8 Once it has been directed to accept a delivery, the driver will be directed to the reception area where the waste will be unloaded.
- 6.1.9 Odour monitoring procedures will be in place to confirm that the odour control measures are being carried out and are effective (see Section 7).

Storage of Potentially Odorous Wastes

- 6.1.10 Waste will be stored only within the designated storage areas.
- 6.1.11 Waste storage times will be kept to a minimum and waste will generally be treated within 5 days of delivery. Additionally, the site will prioritise any wastes which have a high odour potential to ensure that any risks to receptors are reduced/removed as a priority.
- 6.1.12 Storage areas will benefit from regular housekeeping to ensure that waste will not become lodged in corners and to ensure that these areas cannot become a potential source for odour.
- 6.1.13 Odour monitoring procedures will be in place to confirm that the odour control measures are being carried out and are effective (see Section 7)

Treatment of Potentially Odorous Wastes

- 6.1.14 If it becomes apparent that the site has accepted too much waste the Site Manager will assess whether the volume of waste can be processed in a timely manner i.e. if the waste can be processed within 5 working days of receipt. If the waste cannot be processed, the excess waste will be transferred off site to an alternative facility as soon as practicable and NRW will be informed.
- 6.1.15 Under normal operating conditions, the site will operate a 'first in, first processed' system to ensure that the oldest waste within the storage area is processed first. This will help to minimise the waste retention times and odour production.
- 6.1.16 Odour monitoring procedures will be in place to confirm that the odour control measures are being



carried out and are effective (see Section 7)

Poor Site Cleanliness

6.1.17 If the site is kept to a poor standard of cleanliness, then the potential for odour generation will increase. Therefore, management systems are in place to ensure that the site is maintained to an extremely high standard of cleanliness. This site has an Environmental Management System (EMS) which contains the maintenance and cleaning schedules and records.

6.1.18 In summary, the following measures will be in place.

- **Routine Site Inspection Programme** – all areas of the site, including the waste reception, storage and treatment areas and items of plant and machinery will be inspected regularly and routinely, and any necessary cleaning of these areas will be undertaken in a timely manner. All inspections will be recorded within the site's EMS and will be undertaken by appropriately trained staff.
- **Routine Site Cleaning Programme** – all areas of the site, including the waste reception, storage and treatment areas and items of plant and machinery will be cleaned and disinfected regularly and routinely, to ensure that there is no build-up of putrescible wastes or residues. All cleaning will be recorded within the site's EMS and will be undertaken by appropriately trained staff.
- **Vigilance and Reporting** – all site operatives will be vigilant at all times and will inform a senior member of staff as soon as practicable if they notice that the site is unclean or that high levels of odour being generated at the site.

6.1.19 Odour monitoring procedures will be in place to confirm that the odour control measures are being carried out and are effective (see Section 7).

Future Considerations

6.1.20 It is considered that the above measures should be sufficient to minimise the production of odour on this site. However, this OMP will be reviewed annually and the control measures and procedures in place may be amended if required.



7.0 Monitoring

- 7.0.1 Monitoring will be undertaken at the site in order to assess the effectiveness of the control measures described above. This will ensure that should there be any odour emissions from the site, the operator will be aware and will implement the necessary remedial action.
- 7.0.2 The monitoring will provide an ongoing record of any odour events and this record can then be referred to if there are any odour complaints to establish whether the monitoring is effective in identifying odour incidents. This will also provide a more integrated and efficient approach to handling odour issues, for instance if an odour issue is identified through routine monitoring, the cause of this can be investigated, recorded and addressed immediately before any complaints are received. This will enable the operator to anticipate and address the concerns of complainants more proactively.

7.1 General Monitoring

- 7.1.1 All site personnel will be vigilant and will report any odour problems to the Site Manager or Site Supervisor.
- 7.1.2 The Site Manager will record any reported odour problems in the relevant section of the site's EMS.

7.2 Off-site Odour Monitoring

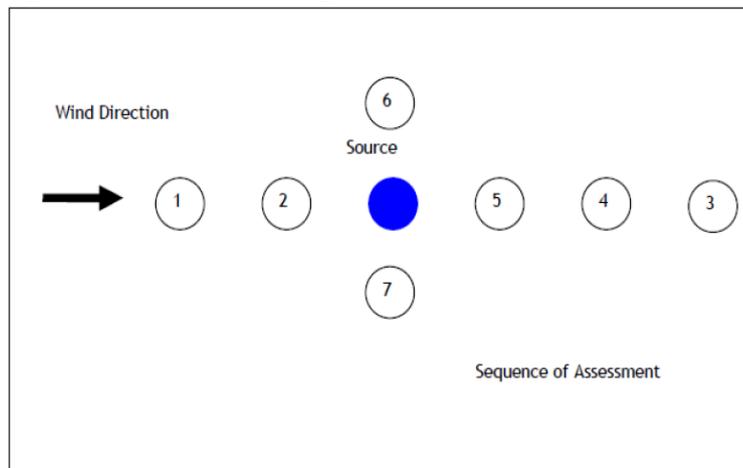
- 7.2.1 A subjective sniff testing exercise will be undertaken three times each day that the site is operational – first thing in the morning, at midday and in the afternoon. Sniff testing will also be undertaken should there be any complaints relating to odour at the site.
- 7.2.2 The assessor will be a member of site personnel who is trained in this procedure. The assessor will be a member of staff who is based mainly in the site office as they will be less exposed to any site odour and so are less likely to be desensitised. In addition, the midday assessment will be undertaken after the assessor has left the site for at least half an hour for a lunch break. This ensures that all reasonable measures are taken to ensure that the assessment is robust and reliable.
- 7.2.3 To ensure that the assessor is not suffering from odour fatigue, they will not enter the waste buildings on the day of the assessment until they have completed the monitoring exercise. The assessor must also not be suffering from a cold, sinusitis, or a sore throat as these may affect their sense of smell. In addition, the assessor should be a non-smoker, and will avoid food and drink (except water) for



at least half an hour before undertaking the assessment. These measures will ensure that the results of the assessment are robust and reliable.

- 7.2.4 The assessor will use their sense of smell to detect odours near the site and identify their sources.
- 7.2.5 The meteorological conditions during the assessment will be recorded and any relevant information relating to site operations will be noted. A note will also be made if there are any other noticeable sources of odour in the vicinity.
- 7.2.6 The exact locations for monitoring will depend on the meteorological conditions at the time of the exercise, but in general terms the following sequence of assessment (Figure 1) will be followed, with areas of weaker strength inspected prior to stronger. The 'source' will be the permitted area.

Figure 1: Odour Monitoring Locations





8.0 Abnormal Events and Contingency Plans

8.1 Possible Abnormal Events

- 8.1.1 The possible events considered to have the potential to result in an increased risk of off-site odour impact are listed in Table 2. The main reason that the risk of odour is increased in these instances will be because the abnormal events may cause the temporary disruption of normal site activities, which can result in a back log of odorous waste pending processing.
- 8.1.2 It is difficult to minimise the risk of abnormal events; however, the operator has in place contingency measures which allow them to mitigate and respond to the implications of the abnormal event.
- 8.1.3 The events and response measures to be implemented are presented in Table 2 below. The contingency arrangements explained in Section 9.2 describe the actions that the operator may take to ensure that biodegradable waste materials do not remain on site long enough to cause unacceptable odorous emissions.

Table 2: Abnormal events, impact and response measures



Event	Location	Potential Effect	Mitigation Measures to Prevent Occurrences	Response Measures if it occurs
Severely odorous wastes received	Waste reception area	Increase in emissions from reception area while severely odorous materials are present.	<p>Strict waste acceptance procedures (see Section 6.1)</p> <p>The site has limited storage capacities and is restricted to a maximum throughput of 54 tonnes per day.</p>	<p>If the waste is deemed too odorous, the waste will not be accepted at the site.</p> <p>Should a load that contains severely odours waste go undetected until it is unloaded, the waste will either be removed from the site or priority will be given to processing the waste first.</p> <p>If severely odorous waste is repeatedly received from the same producer, then they will be informed so that they can investigate potential prevention measures.</p>
Plant breakdown	Waste treatment area.	Increase in emissions if materials become backlogged and degradation occurs.	The site will operate a planned preventative maintenance programme for all plant and equipment on site and will have back-ups of those items that could potentially lead to odour being produced, i.e. pumps etc.	<p>Receipt of waste will cease if necessary until machinery is functioning again.</p> <p>Any necessary repairs and maintenance work will be carried out in a timely manner.</p> <p>If necessary, wastes will be transferred off-site to an appropriately permitted facility.</p>
Power failure	Waste treatment and storage areas.	Increase in emissions if materials become backlogged and degradation occurs.	The site will operate a planned preventative maintenance programme which will include power supply infrastructure.	<p>A back-up generator may be installed at the facility.</p> <p>The supplier will be notified as soon as possible.</p> <p>Instigate immediate investigation and remedial action as required.</p> <p>If the failure is for an extended period, the site will cease or minimise the acceptance of waste, as necessary.</p> <p>If necessary, wastes will be transferred off-site to an appropriately permitted facility.</p>



Restricted staff availability.	All operational areas.	Increase in emissions if materials become backlogged and degradation occurs.	<p>The Site Manager will ensure that they have an appropriately trained staff member that they can delegate their role to should they be unavailable.</p> <p>The site management staff will have a staff resources plan that ensures that sufficient numbers of staff are available at all times to undertake each role.</p>	<p>If required additional staff may be hired on a temporary basis to cover the absent staff.</p> <p>If necessary, wastes will be transferred off-site to an appropriately permitted facility to reduce or remove waste volumes to a manageable level.</p> <p>If it is deemed that there are insufficient qualified staff to safely and properly run the plant, activities will be temporarily halted.</p>
Extreme winds and gales.	All operational areas.	Increased risk of emissions off-site, depending on the prevailing wind direction.	Activities will be provided with sufficient infrastructure with regards to storage bays and treatment techniques.	All wastes will be stored and treated within the confines of a building. The building doors will be kept closed at all times unless vehicles and mobile plant are accessing the building. As such, it is considered unlikely that gales or wind will cause an increase in odour emissions.
Extreme cold/snowfall.	All operational areas.	Difficult vehicle access could result in a backlog of material pending processing. Disruption to water supply.	Weather conditions will be monitored.	<p>If possible, snow will be cleared to enable normal access into and within the site.</p> <p>If necessary, wastes will be transferred off-site to an appropriately permitted facility.</p>
Fire.	All operational areas.	Risk of increased impact from any area of the site affected by fire (during and after).	Fire risk has been assessed as part of the Environmental Risk Assessment.	<p>Should a fire occur within the site, operations will be temporarily suspended and no further waste will be accepted on site.</p> <p>If necessary, wastes will be transferred off-site to an appropriately permitted facility.</p>
Flood.	All operational areas.	Risk of increased impact from any area of the site affected by flood (during and after).	The site is not located in an area at risk of flooding.	<p>Should flooding occur on site, operations will be temporarily suspended and no further waste will be accepted on site.</p> <p>If necessary, wastes will be transferred off-site to an appropriately permitted facility.</p>



Unexpected large loads of waste received.	All operational areas.	Could result in a backlog of material pending processing.	<p>Waste pre-acceptance procedures will ensure that the site staff will be aware of the deliveries in advance.</p> <p>The site has limited storage capacity and is restricted to a maximum throughput of 54 tonnes per day.</p>	<p>The site manager will assess the volumes of waste present on site on a daily basis.</p> <p>The Operator will not accept waste on the site if there is not sufficient storage and treatment capacity to handle the waste without increasing the risk of odour emissions.</p>
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8.1.4 If any abnormal events do occur, they will be recorded in the appropriate section of the EMS along with any actions taken in response. If deemed necessary, operational procedures may be reviewed and amended following the event.

8.2 Assessing Capacity

8.2.1 In the event of an abnormal event, the operator will make every reasonable effort to ensure that the site is operated within the conditions of the Environmental Permit and that there is no increased risk of odour emissions.

8.2.2 If it is apparent that the abnormal event may result in the increased risk of odour emissions then the Site Manager will make an assessment of the available storage and treatment capacity and assess how this is affected by the event.

8.2.3 In order to do this, the following steps will be taken:-

- Make an assessment of the volumes of potentially odorous wastes present on site as soon as it is practicable to do so. The operator has limited storage capacity on site and can easily monitor the available capacity of the site at any given time;
- Make an assessment as to whether it is possible to process the wastes that are already on site within the specified limit of 5 days from the receipt of the waste. In order to determine this, the operator will take into account the conditions of the Environmental Permit, the normal waste physical treatment capacity, the capacity of plant and the potential impact on these capacities that the abnormal event will cause; and
- If it is apparent that the site does not have the capacity to process the waste within the specified time limit, then the Site Manager will decide to transfer the waste off-site.



- 8.2.4 By undertaking the above assessment as soon as possible after the occurrence of the abnormal event this will prevent the build-up of potentially odorous wastes on the site which is preferable to attempting to process all the waste as quickly as possible and failing to do so within the specified time limit.



9.0 Odour Complaints Management

9.1 Purpose of Complaints Procedure

9.1.1 NRW's H4 guidance details that an OMP should demonstrate how the operator will respond to complaints. Any complaints should be investigated promptly and appropriate remedial action should be taken. The complainant and anyone else likely to be affected should be informed of any action taken in response to the complaint.

9.1.2 A procedure has been developed (see Table 3 below) to ensure that complaints will be handled by DPS appropriately and consistently in accordance with the requirements of H4 and to reassure NRW and the public that any of their concerns will be acknowledged and acted upon where appropriate. The procedure will be reviewed on an annual basis or in the event of any significant odour issues

9.2 Complaints Reporting Route

9.2.1 To ensure that members of the public are easily able to report any complaints relating to odour emissions from the site, there will be a display board at the site entrance which details the site name, the permit number, NRW's contact details and DPS's contact details. By providing contact details for the NRW as well as the operator, this ensures that the member of public can report their complaint and be confident that it will be received by the appropriate party even if they do not wish to discuss their complaint directly with the operator. The reporting route is illustrated in Figure 2 (below).

9.3 Complaints Records

9.3.1 Auditable records will be kept of any complaints made and the investigations undertaken. This will provide an ongoing record of the causes of odour incidents which will enable DPS to identify any patterns which would prompt a review in odour management procedures and control measures.



Figure 2: Odour Complaint Reporting Routes

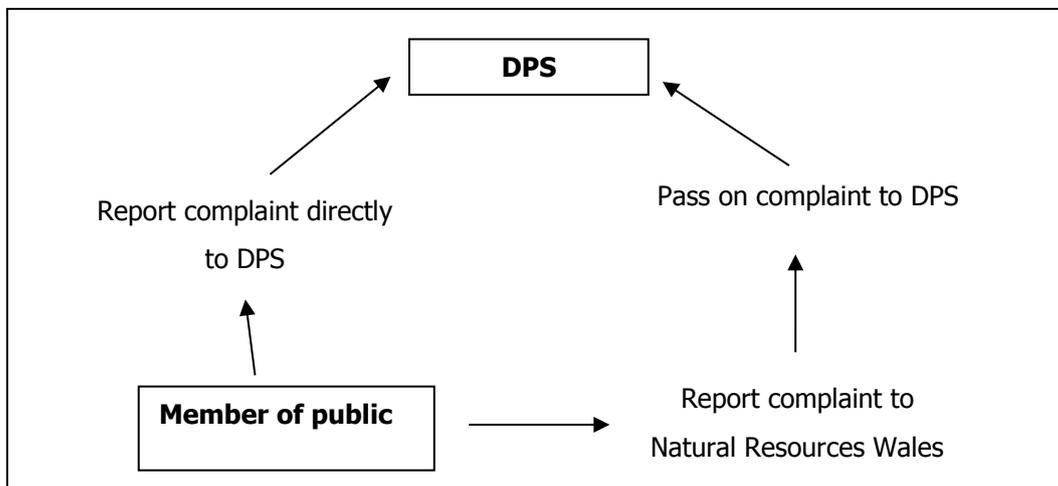


Table 3: Odour Complaints Procedure

Action	Person responsible for ensuring action is carried out	Timescale for Action Completion
1. The Site Manager will be notified of the complaint and will make the appropriate managerial staff and site operatives aware of the complaint. The complaint shall be formally recorded using the Complaint Report sheet contained within the site’s EMS (Appendix B of this OMP).	Site Manager	Within one working day of receipt of the complaint.
2. The complaint will be investigated by: <ul style="list-style-type: none"> a) Checking the odour monitoring records to see whether the complaint corresponds to the monitoring records. b) Checking the Site Diary and waste acceptance records to see if any particularly odorous waste was accepted. c) Checking the Site Diary to see whether the complaint corresponds to any operational issues at the site, such as damage to doors or damage to other odour management infrastructure. 	Site Manager	Within one working day of receipt of the complaint.



	If the cause of the complaint is established it will be recorded within the Complaint Record Sheet. If no particular cause is identifiable then this will also be recorded.		
3.	If a number of complaints are received about a particular incident, then it might be necessary to increase the frequency of odour monitoring.	Site Manager	Within one working day of receipt of the complaint.
4.	The Site Manager will instigate any necessary reviews of procedures and will implement any required changes. Any maintenance to odour management infrastructure will be undertaken as soon as possible.	Site Manager	Within seven working days of receipt of the complaint.
5.	If appropriate, the complainant and the Natural Resources Wales will be informed of any corrective actions taken.	Site Manager	Within seven working days of receipt of the complaint.
6.	A follow up audit on the corrective actions implemented shall be undertaken to ensure the preventive procedure was effective and to determine if any additional actions are required.	Site Manager	Within two weeks of receipt of the complaint.
7.	Once the follow up audit has been completed, the Site Manager will ensure that the complaint and any action taken and the effectiveness of that action are recorded in the EMS. This record shall also note any amendments to procedures, both environmental and health & safety, which may be required following the investigation. The record shall be kept in the site office at all times or if it is an electronic record it will be accessible from the site.	Site Manager	Within two weeks of receipt of the complaint.



10.0 Community Liaison and Engagement

10.1 Liaison and Engagement

10.1.1 DPS will establish clearly defined and accessible communication channels for local residents to report odour issues. These include:

- Contact details (including telephone number and emergency 'out of hours' telephone number), displayed on the main site notice board positioned at entrance to the site; and
- Website giving relevant contact details, including email, telephone and postal address.

10.1.2 It is not considered necessary to undertake formal local liaison meetings initially, as the measures in place are considered sufficient to minimise the risk of emissions. Should it become apparent that the measures are ineffective or odour becomes a problem at the site, it may be decided to undertake a formal meeting with residents to discuss concerns and to open a dialogue.

10.1.3 DPS is committed to ensuring that any issues identified by the local community are promptly acted upon to ensure ongoing co-operation between the two parties.



11.0 Document Review

11.1 Document Review Procedure

11.1.1 This Odour Management Plan (OMP) will be formally reviewed by DPS on an annual basis or immediately upon a substantiated odour complaint. This will ensure that the controls in place continue to be effective.

11.1.2 The OMP will also be reviewed following any changes in site operations that may have an influence on the risk of odour emissions.



Drawings

J17002-DPSPS-R-XD-0002 - Layout Plan Severnbridge Unit 7



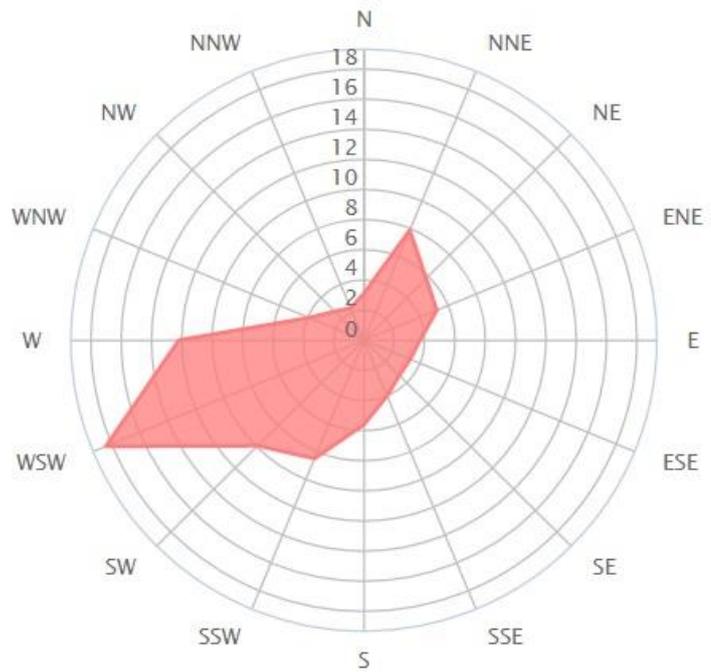
Appendices



Appendix A – Wind Rose Data



Severn Beach Wind Rose Data 01/2008 – 06/2017





Appendix B – 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):	
Wind direction (e.g. from NE):	
Complainants description of odour: <ul style="list-style-type: none"> • What does it smell like: • Intensity: • Duration (time): • Constant or intermittent in this period: • 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:	
Site Use Only	
Do you accept that odour likely from your activities?	
What was happening on site at the time the odour occurred?	
Operating conditions at time the odour occurred (e.g. flow rate, pressure at inlet and pressure at outlet):	
Actions taken:	
Form completed by:	Signed: Date: