

Street Fuel Ltd

Beth 6, Basin 3

Chatham dockyard

Chatham ME4 4SR

DUST MANAGEMENT PLAN

Permit No. EPR/XP3598XP

Global Waste Technical Services Ltd

Global solutions... any waste, anywhere...

Revision 1.1 May 2013 (15th May 2013)

1.0 Background

- 1.1 The original site permit was issued in 2006 to accept mainly paper and cardboard and a variation added in 2010 to accept additional waste codes. Permit number EPR/NP3490EE. The permit allows the handling of not more than 280,000 tonnes of a wide range of wastes per annum. The site is permitted to handle up to 20000 tonnes at any one time.
- 1.2 The facility handles five principle waste streams:
1. Mixed commercial and industrial wastes,
 2. Mixed construction and demolition wastes,
 3. Segregated paper cardboard,
- 1.3 The permit conditions require that degradable household, commercials and industrial wastes must be processed within 24 hours of receipt.
- 1.4 Condition 3.3 of the permit addresses the control of dust. It states:
- 3.3.1 Fugitive emissions of substances (excluding odour and noise) shall not cause pollution. The licence holder shall not be taken to have breached this condition if appropriate measures have been taken to prevent or where that's not practicable to minimise, those emissions*
- 1.5 The draft EMS (operational techniques) is attracted as Appendix 1
- 1.6 The nearest residential properties are to the western side of the site, which is about 400 metres from the site and separated from it by open grass land
- 1.7 An analysis of the nature of the complaints based on the EA's compliance assessment /site inspection reports in contained in Appendix 2. In order to address these complaints the Environment Agency has requested that the Company submit for approval a Dust management plan to be implemented forthwith.
- 1.8 Discussions have taken place with the Environment Agency regarding the physical and procedural improvements necessary to prevent, or where this is not practicable, to minimise the dust generation.
- 1.9 The aim of this dust management plan is to ensure that dust is controlled or eliminated so as not to materially affect the enjoyment of neighbouring properties or cause harm or offence or reduce their legitimate use of the environment. This dust management plan is intended to be a working document with the specific aim of ensuring that:
- Dust is primarily controlled at source by good operational practices,
 - all appropriate measures are taken to prevent or where that is not reasonably practical, to reduce dust emissions from the facility at nearby sensitive receptors,
 - appropriate monitoring of dust takes place,
 - actions, contingencies and responsibilities are clearly specified to address problems should they arise,

- regular reviews of the effectiveness of the dust control measures take place.
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2.0 Description of Site and waste handling processes

Site overview

2.1 The site comprises a waste recycling and transfer facility Chatham Dockyard. It is located on Basin 3 of the dockyard. The site extends to just under 2.7 of a hectare.

The surrounding area and dust sensitive receptors

2.2 The site is bounded to the north by open rough ground. To the south, are basin 3 and then industrial and warehousing areas. To the east, the site has warehouses and then to the river Medway and to the west residential property 400metre away across grass land .

Description of site activities

2.3 The facility comprises a waste recycling and transfer operation handling the waste streams set out in paragraph 1.2 above. The principle waste handling operations take place within the waste handling building. This building measures approximately 50 metres x 50 metres x 12 metres to the eaves. After completion of transfer the whole site including the frontage warehouses will be used for storage/treatment of waste.

2.4 Vehicles delivering waste to the site report to the weighbridge office where the consignment is weighed and recorded, and the appropriate documentation exchanged.

2.5 All incoming wastes received at the site are subjected to a documented and recorded inspection procedure to confirm the acceptance or rejection of the waste. This constitutes a visual check to confirm that a waste is the same as that which is described in the accompanying documents.

2.6 Once the waste reception, inspection and acceptance procedures have been completed at the weighbridge, waste delivery vehicles are directed to the material recycling building. Or stored in outside bays. On depositing in the reception bays the loader driver spreads the load for a further inspection to ensure compliance with the site permit.

2.7 Any loads of waste found on inspection at the weighbridge to not conform with the permit are not being permitted to proceed beyond the waste reception area. Drivers will be directed to remove the waste to a suitable facility for disposal. All such non conforming loads will be recorded on the site diary.

2.8 If non-permitted wastes are discovered amongst a load of deposited waste in the material recycling building, the material is isolated. The waste will either be:

- Re-loaded into the delivery vehicle,
- Loaded into an isolation container for subsequent removal from site and disposal at an appropriately permitted facility,

- Otherwise dealt with in accordance with procedures discussed, and agreed with the Agency.

Principle waste handling and treatment processes

- 2.10 Three principle activities take place within the building:
- The importation unloading and physical sorting of general mixed commercial and industrial wastes,
 - The importation of mixed commercial and industrial recycling residues suitable for the manufacture of refuse derived fuel by shedding and screening.
- 2.11 In addition to the waste handling activities that take place within the main building, two additional waste handling activities take place within the yard area:
- The storage and sorting of paper and card,
 - The storage/bulking of bulky household items.
- 2.12 Waste is delivered to the site principally in skips, roll-on-off containers. It is removed from the site principally in bulkers.

Principle dust sources – on site

- 2.13 There is the potential for dust emissions to arise from the operation of the facility as described above. The application of good management procedures would, however, be capable of eliminating and minimising emissions to an acceptable level. The main sources of dust within the facility are as follows:
- Mixed C&I waste delivery, processing, storage and transfer – Limited dust potential. Potentially would be a higher risk in dry weather conditions.
 - Receipt of dry recyclable waste (timber, paper, card) – Limited dust potential. Potentially would be a higher risk in dry weather conditions.
 - Processing and storage of residual waste to manufacture RDF – Limited dust potential.

3.0 Dust Control during normal operations

General

- 3.1 The application of good working practices and process control is of fundamental importance in eliminating and minimising the quantities of dusts formed on site and their subsequent release to atmosphere. This approach is preferred as it is much more difficult to reduce dust impact through improving atmospheric dispersion.
- 3.2 The overall aim in the operation is to:
- prevent the formation or emission of dust and particulates compounds in the first place;
 - where this is not practicable, minimise the release of dusts to abate excessive emissions;

- 3.3 A number of control techniques have been included within the design of the facility, in order to ensure the most effective dust control . The measures employed include:
- the housing of the complete process (reception, treatment and storage) in the building with hanging plastic strips to reduce the open frontage area of the building;
 - different parts of the facility are sectioned off with internal temporary wall partitions so that waste handling within each section is managed effectively by the use of water sprinkler system
 - A mistair system of dust and odour control to which odour neutralizing agent can be added.

Agreements with feedstock suppliers

- 3.4 A major factor affecting the potential for dust emissions at the waste delivery and reception stage is the content and nature of the feedstock. The Company will exercise rigorous control of delivered feedstock. In any 3rd party agreement to accept waste, there will be a clause which covers the delivery of loads consisting mainly of dust, powders and lose fibrous material to the facility.

Waste composition

- 3.5 As for any waste stream, the primary major factor affecting the potential for dust emissions at the waste delivery and reception stage is the content and nature of the wastes to be delivered.
- 3.6 The Company will exercise rigorous control of delivered materials to ensure that the delivery of dusts, powders and fibrous material to the facility does not take place. It will be within the site supervisor's power to reject any material that will jeopardise his ability to manage the site and prevent the emission and migration of unacceptable quantities of dusts, fibres and particulates.
- 3.7 Waste inputs to the facility consist mainly of the following:
See attached list Ref. No. 001

Handling of dry recyclable wastes

- 3.8 The dry recyclable waste stream will contain only trace quantities of putrescible material and will therefore have a low potential to generate dust. Staff will visually inspect the waste as it is delivered and remove contaminated material when it is spotted. The contaminants will be bulked up with the residual wastes for onward transport for recovery or disposal.

Handling of residual waste

- 3.9 The facility provides a delivery and bulking-up point for residual wastes. Within the facility, waste will be temporarily stored before being loaded into articulated bulk carrier vehicles for onward transfer to recovery or disposal facilities.

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- 3.10 During operations involving the handling of residual waste within the facility, the following dust control measures will be employed:
- Residual wastes will be assessed for dust generating potential immediately upon delivery by the machine driver. If the material is considered to be particularly dust, it will watered/hosed down to prevent dust migration and contained within the reception building
 - Residual wastes will not be unnecessarily handled, in order to avoid disturbance which could result in further emissions of dusts;
 - The residence time of residual waste within the building will be minimised and managed in accordance with the Environmental Permit;
 - Residual waste will be removed from site in bulk within sheeted waste transport vehicles.

Cleaning

- 3.11 Regular cleaning of internal machinery, wheeled loaders and operational areas within the building, roads and drainage channels will discourage dust generation from mud produced through watering down loads. The cleaning procedure and frequency would be developed and implemented on the site manager instructions. Weekly checks will be recorded with in the daily site diary and inspected by the site manager.

4.0 Routine Monitoring, Recording and Reporting

General

- 4.1 This section of the DMP sets out the monitoring procedures that will be implemented, during normal operations, to assess the effectiveness of operational practices to prevent and contain dusts, and to assess the nature and extent of an dust problem should it arise.

Overview of Monitoring Plan

- 4.2 The monitoring of dust emissions from the facility will be undertaken in order to ensure releases do not result in a dust nuisance at sensitive receptors. This monitoring includes both emissions monitoring of dust and inspections of the processes, buildings and equipment to check that emissions are being contained and controlled to meet the accepted standards of good practice in relevant guidance.
- 4.3 In order to evaluate the performance of control techniques and abatement processes in use at the facility, the Company will monitor dust in the following ways:
- a daily programme of dust monitoring in conjunction with the odour monitoring stated in the OMP
 - monitoring of weather forecasts;
 - monitoring of complaints and other forms of community feedback;
- 4.4 The following parts of this section of the DMP give further detail on how this monitoring would be carried out.

Dust Testing/Monitoring

- 4.5 Monitoring of dust migration will be undertaken by the site supervisor to record the attributes of the dust. Dust “sticky pad” monitors will be placed around the site and samples taken every 7/14 days and sent away for analyzing. Monitors will be checked daily as part of the daily visual checks
- 4.6 Dust testing/monitoring will be employed for the following reasons:
- as part of a daily walkover survey at the site boundary during normal operations, to confirm the effective performance of dust control measures in place;
 - at the site boundary during periods of adverse meteorological conditions, breakdowns or during other abnormal events to evaluate the effectiveness of the control measures in place and the likelihood that dust complaints will be received; and
 - in the event that complaints are received, at the locations of sensitive receptors as part of the complaint investigation procedure outlined in Section 5.

Monitoring of On-site Meteorological Data

- 4.7 Certain meteorological conditions, such as low wind speeds, can result in poor dispersion of fugitive dusts and fibres. This can potentially lead to an increased risk of dust annoyance at sensitive receptors.
- 4.8 The use of meteorological forecast data will be applied at the facility for the following reasons:
- to predict when periods when conditions for the dispersion of dust are likely to be poor, enabling additional monitoring to be scheduled and planned maintenance operations to be re-scheduled to avoid such times;
 - to identify times when operations may need to be adjusted to account for adverse conditions;
 - during routine operations, to plan where boundary monitoring should be focused to assess dust impacts;
 - at the time of abnormal events to predict where dust impacts could potentially occur; and
 - in the investigation of dust complaints.

Complaints Monitoring

- 4.9 Complaint data is recognised by the Environment Agency as the single most important tool for assessing the overall level of dust impacts experienced by members of the public at locations outside the site boundary. It is therefore vital to record and act upon complaints received, and communicate the outcome of investigations to complainants.
- 4.10 The Company will implement a system of complaints monitoring and analysis. Complaints will be collected, registered and validated as described in Section 5 of this DMP.

Dust Diaries and Community Surveys

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4.11 The Company recognises that there is the potential for circumstances to arise where dust complaints from community members contradict the results of the daily dust monitoring programme, due to the 'adaptation' of site based staff to dusty released from the facility. Where it is found that this occurs over an extended period of time, consideration would be given to engaging members of the public in key locations to undertake a period of community monitoring in order to evaluate and optimise the performance of the routine dust monitoring programme. The community monitoring programme would take the form of participation in off-site walkover surveys and the keeping of dust diaries.

Recording of results, reporting and actions
Recording of results

4.12 The Company will maintain records of all monitoring carried out under this DMP. The records will be retained, as required by the Environmental Permit

Reporting

4.13 In addition to implementing the reporting requirements for monitoring, as set out within the Environmental Permit, individual reports of complaints will be notified to the EA immediately after receipt, as detailed in Section 5.

Actions in the Event of Abnormal Emissions

- 4.14 In the event that monitoring indicates that abnormal emissions from the facility are taking place, the site management would take the following actions:
- check relevant waste streams in order to identify possible cause of the abnormal emission.
 - cease the activity causing the abnormal situation, if necessary;
 - if possible, take immediate steps to eliminate the cause of the abnormal situation.
 - record response and remedial action taken; and
 - Follow internal procedures to advise of possible complaints with details of the problem.

5.0 Document Updates and Reviews / Management

General

- 5.1 This section of the DMP provides information on:
- staffing responsibilities;
 - staff training;
 - complaint management, investigation and resolution procedures;
 - provision of a complaints telephone line; and communications with external stakeholders.

Roles and Responsibilities

- 5.2 The Company is committed to managing effectively the off-site impacts of dust from the facility. This commitment extends from director level. This section describes the responsibility for the management and operation of the facility.
- 5.3 The company has appointed an site manager with the authority and responsibility for implementing its management system. Work instructions, job descriptions and procedures exist for critical areas of the Company's activity and have been issued to or made available to personnel responsible for undertaking these tasks.
- 5.4 The Company has a well-defined and formally documented management structure for managing the impacts of dust from the facility. It is the responsibility of the operations manager, with the support of the environmental professionals where necessary, to identify environmental risks that are relevant to the site and determine if a particular activity or service is environmentally significant. Once identified, it is the responsibility of the operations manager to highlight the significant aspects to all relevant employees and contractors. The operations manager is also responsible for monitoring and managing all activities under the Company's control to improve environmental performance.
- 5.5 Further information on the role of staff members and responsibility for dust management is given below:
- The facility is the responsibility of the Operations director of the Company who is located on site
 - The facility has a dedicated Site Manager who has overall responsibility for the operation of the site.
 - Routine preventative maintenance and reactive breakdown maintenance is the responsibility of the Operations Manager
 - The facility site manager, who reports to the Operations director, is responsible for the site operatives.
 - During night hours and weekends, a member of staff is available on-call.
 - Operational staff members at the facility site are responsible for maintaining an awareness of general process performance during their day-to-day activities on the site. Staff is instructed to note and observe any unusual odour occurrences and to report these to the Operations Manager without delay.
 - Site manager reports serious issues to the group environmental manager who liaises with the directors at their weekly meetings, that involves the operations and site manager, to discuss complaints and issues. Relevant instruction are then relayed to the site operatives through the site manager.

Directors

Site Manager COTC Holder

Site operatives

Training and Competency of Operational Staff at the Facility

- 5.9 All staff at the facility are made fully aware of the need to be constantly vigilant with regard to site dust control and management procedures. Staff responsible for the operation, maintenance or repair of dust control plant will be trained and competent. Records will be maintained (documented training records) demonstrating compliance with this. In order to minimise risk of emissions, particular emphasis will be given during training to:
- general awareness of responsibilities for avoiding dust nuisance;
 - actions to minimise emissions during abnormal conditions
- 5.10 Management will maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment.
- 5.11 The staff will receive regular refresher training.

Complaints Handling and Communications

- 5.13 In the event that a dust complaint is received, it is important that it is properly and systematically dealt with, and acted upon.
- 5.14 The Company will maintain a register of all complaints and in all cases the operations manager shall ensure that all complaints have been adequately handled and that any measures necessary to prevent a recurrence have been put in place.
- 5.15 Administrative arrangements will be put in place for the facility to efficiently record complaints, act on them where necessary, and to produce summary reports on the levels of complaints and what this means.

Publicising contact details for odour complaints

- 5.16 Members of the public are able to contact the Company with any complaints about the facility by the following means:
- By telephone – the contact number 07810 825557 will normally be manned from Monday to Friday between the hours of 07:00 and 17:00. Outside of these hours, and on infrequent occasions during the above hours when an immediate reply cannot be made, there will be an answer phone service.
 - By email to environment@streetfuel.co.uk
- 5.17 These methods of contacting the Company will be displayed at the site and shown on the company website.

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5.18 Once a complaint has been received and the details collected, the complaint must be processed. This involves the actions described below.

Complaint recording

5.19 The Company will maintain a record of all complaints received. In the event that the Company receives a complaint alleging potential dust nuisance from the facility:

- the complaint will be fed into the registration system;
- complaint data will be recorded in a systematic way, enabling comparison with standard dust descriptors, with wind direction and with site work activities.

5.20 The facility complaints register will be inspected on a monthly basis by the site Manager to obtain the data necessary for complaints monitoring and analysis. The results of this complaints monitoring and analysis will be reported as described in Section 4.

Collecting the relevant complaint details

5.21 Wherever possible, the following minimum information will be collected for each complaint:

- the time and date when the offensive dust was observed;
- the location where the offensive dust was observed, e.g. postal address, grid reference) and its sensitivity;
- the Complainant's description of dust, particles or fibres. This should include a subjective description of all the factors necessary to make an assessment of the impact of the dust, including intensity, character, frequency and duration;
- the identity of the complainant, if possible, to assess the repeated nature of complaints;
- the residential address of the complainant; and
- any other information the complainant can offer on activities at the alleged dust source.

5.22 It is also necessary to collect (by observation or further investigation) the following additional information to allow subsequent analysis and collation of complaints:

- wind direction and speed, and at the time of complaint; and any process incidents at the time of complaint.
- other off-site activities ongoing at the time, such as associated with the adjoining sites.
- All information will be recorded within the daily site diary

5.23 A standardised form, used both for odour and dust, (based on that used by the Environment Agency in its Consultation

Draft H4 technical guidance note) is used for recording this information and entering it on the registration system. (see Appendix 3)

Investigation of dust Complaints

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- 5.24 This response procedure sets out what investigative actions will be taken in response to a complaint. The aim of the investigative actions will be to establish:
- the source of the dust complaint; and
 - the impact of the dust.

Complaint screening

- 5.25 The investigation will start with an initial screening of the complaint. If the screening process fails to confirm the dust incident, then the investigation will stop at that point. If the screening process confirms the dust incident, then a more detailed investigation is carried out.
- 5.26 The object of the initial screening is to quickly screen out those dust complaints that are unlikely to be due to the facility, perhaps because they result from some other activities in the area.
- 5.27 The initial screening exercise will consider the following:
- knowledge of potential sources at the facility (including work activities in progress, any technical problems, etc);
 - knowledge of potential sources in the locality other than the facility, such as those listed in Section 2.4;
 - wind direction at the time of the alleged complaint episode;
 - distance of the complainant from site; and
 - concurrent dust monitoring data (e.g. daily perimeter sniff tests).
- 5.28 The Company will liaise with local stakeholders (including the complainant) and inform them on the outcome of the screening assessment of the complaint and whether or not any action is to be

Further investigation of the complaint

- 5.29 If the initial screening concludes that the facility could be the source of the dust complaint, then further investigation will be carried out, which will either 'confirm' and 'further characterise' the incident as due to the facility, or it will 'fail to confirm' the incident.
- 5.30 Further investigation will be by means of a graded response, designed to answer the questions:
- can the source of the episode be linked to the facility?; and
 - What is the scale of the impact?
- 5.31 The Company may use dust monitoring to provide supporting data to answer these questions, or provide additional confirmation. The monitoring effort is increased in a graduated way until the data generated is sufficient to answer the relevant questions being asked. If the level of monitoring being carried out at a particular stage in the graded response cannot answer the question (either at all, or with sufficient confidence to satisfy stakeholders) then monitoring should move to the next level.

Communicating with the Environment Agency

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5.32 In the event that any complaint is made by a member of the public about any matter associated with the facility, the Company will provide information on the nature and outcome of the complaint to the EA.

Communicating with complainants

5.33 In the case of answer phone messages and complaints submitted by email or by letter, an acknowledgement and initial response will be given by telephone or by email within two working days, provided that telephone or email contact details have been given by the complainant. Where complaints cannot be resolved on initial contact and further investigations are required, a written response will be made within 10 working days of submission of the complaint.

5.34 The primary reasons for further investigation of complaints are to assess potential nuisance and identify the likely cause and source of the dust so that nuisance can be reduced or stopped. In the case of further investigations, the Company will communicate to the complainant the course of actions likely to be taken so as to ensure that there is transparency and also to establish at the outset clear targets and goals for determining the success of any control measures.

5.35 The level of annoyance associated with dusts can often be reduced if affected individuals are provided with credible information about what they are seeing, the process that generates the dust, any factors affecting dispersion, what health impacts might be associated with the dust, what efforts are being undertaken to control dust migration and what is being done in response to their complaint. These actions can help affected individuals to moderate their own emotions of powerlessness and fear which may be exacerbated by dusts. Liaison with the local community, offering credible reassurance and taking complaints seriously are often effective means of mitigating dust nuisance.

DMP Update and Review

5.36 The periodic review and update of the DMP will be in line with the recommendations of the EA Odour Guidance, and this will take place on an annual basis, as a minimum.

5.37 However, the DMP is intended to be a live document which serves as a reference during day to-day operations, and as such would be updated on a more frequent basis should the following occur:

- significant changes are made to the plant or operational practices;
- there is a change to the management structure, designation of responsibility or training provision;
- the Environment Agency requests that the DMP is updated, in their role as regulator; or
- Complaints are received, which on subsequent investigation result in the identification of further control measures or remedial action, in addition to those set out within this DMP.

Site Dust migration Source identification.
(see appendix 002)

Odour/Dust report form					Date	
Time of test						
Location of test e.g. street name etc						
Weather conditions (dry, rain, fog, snow etc):						
Temperature (very warm, warm, mild, cold, or degrees if known)						
Wind strength (none, light, steady, strong, gusting)						
Wind direction (e.g. from NE)						
Intensity (see below)						
Duration (of test)						
Constant or intermittent in this period						
What does it smell like?						
Location sensitivity (see below)						
Is the source evident?						
Any other comments or observations						

Sketch a plan of where the tests were taken, the potential source(s).

(See appendix 003)

North



<p>Intensity (Detectability)</p> <p>1 No detectable odour</p> <p>2 Faint odour (barely detectable, need to stand still and inhale facing into the wind)</p> <p>3 Moderate odour (odour easily detected while walking & breathing normally)</p> <p>4 Strong odour</p> <p>5 Very strong odour (possibly causing nausea depending on the</p>	<p>Location sensitivity where odour detected</p> <p>0 not detectable</p> <p>1 Remote (no housing, commercial/industrial premises or public area within 500m)</p> <p>2 Low sensitivity (no housing, etc. within 100m of area affected by odour)</p> <p>3 Moderate sensitivity (housing, etc. within 100m of area affected by odour)</p>
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type of odour)	4 High sensitivity (housing, etc. within area affected by odour) 5 Extra sensitive (complaints arising from residents within area affected by odour)
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Form HINC 2

Odour/ Dust 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:		
<input type="radio"/> What does it smell like?		
<input type="radio"/> Intensity (see below):		
<input type="radio"/> Duration (time):		
<input type="radio"/> Constant or intermittent in this period:		
<input type="radio"/> 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

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Intensity (Detectability)

- 1 No detectable odour
- 2 Faint odour (barely detectable, need to stand still and inhale facing into the wind)
- 3 Moderate odour (odour easily detected while walking & breathing normally)
- 4 Strong odour
- 5 Very strong odour (possibly causing nausea depending on the type of odour)

Form HINC 3		Odour / Dust				Sheet No
Diary						
Name:	Address:					
Telephone Number:						

Date of odour:						
Time of odour:						
Location of odour, if not at above address:						
Weather conditions (dry, rain, fog, snow etc):						
Temperature (very warm, warm, mild, cold or degrees if known):						
Wind strength (none, light, steady, strong, gusting):						
Wind direction (eg from NE):						
What does it smell like? How unpleasant is it? Do you consider this smell offensive?						
Intensity – How strong was it? (see below 1-5):						
How long did go on for? (time):						
Was it constant or intermittent in this period:						
What do believe the source/cause to be?						
Any actions taken or other comments:						

Intensity (Detectability)

- 1 No detectable odour
- 2 Faint odour (barely detectable, need to stand still and inhale facing into the wind)
- 3 Moderate odour (odour easily detected while walking & breathing normally)

4 Strong odour

5 Very strong odour (possibly causing nausea depending on the type of odour)

