



**KIRBY MISPERTON A WELLSITE**

**KM8 PRODUCTION WELL**

**HYDRAULIC FRACTURE STIMULATION**

**ODOUR MANAGEMENT PLAN**



**APPROVAL LIST**

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# 1 INTRODUCTION

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## 1.1 Third Energy

Third Energy UK Gas Limited (Third Energy) is the operator of gas fields within Ryedale the area and holds an interest in a total of six (6) Petroleum Licences and one (1) Petroleum Appraisal Licence, granted by the Secretary of State at the Department of Energy and Climate Change (DECC). Under the Petroleum Licensing system this permits the licence holder to 'search and bore for and get petroleum within the licence boundary' subject to the granting of planning permission, in accordance with the Town and Country Planning Act 1990.

Many of the Ryedale gas fields were originally discovered by Taylor Woodrow Exploration Limited and subsequently developed by Kelt UK Limited. Kelt sold its interest in the Ryedale gas fields to Tullow Oil and Edinburgh Oil and Gas. Tullow Oil went on to acquire the interest held by Edinburgh Oil and Gas. Third Energy acquired the interests of the Ryedale gas fields from Tullow Oil in 2003 and has subsequently undertaken an active drilling and workover programme to enhance production of gas from the gas fields located at Kirby Misperton, Pickering, Marishes and Malton.

Third Energy also holds a number of exploration licences and has previously constructed and drilled at Ebberston Moor, within the North York Moors National Park.

Third Energy was granted planning permission by North Yorkshire County Council in May 2016, planning decision notice C3/15/00971/CPO, dated 27<sup>th</sup> May 2016, for a hydraulic fracture stimulation of the KM8 well.

The purpose of this document is to outline the odour management arrangements to be implemented at the Kirby Misperton A (KMA) wellsite during hydraulic fracture stimulation and production operations to satisfy planning condition 26 to enable it to be discharged by North Yorkshire County Council.

## 1.2 Site Details

The KM8 hydraulic fracturing operation and subsequent production testing will be undertaken at the following location:

Kirby Misperton A Wellsite  
Off Habton Road  
Kirby Misperton  
North Yorkshire  
YO17 6XS

National Grid Ref: SE 771789

Site Area: 1.465 ha

## 2 SCOPE

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This Odour Management Plan is applicable to the KMA wellsite and all operations permitted therein, in accordance with the existing planning and permitting consents. It is applicable to Third Energy, its contractors and subcontractors and can be used in support of applications to the Minerals Planning Authority where there is a requirement to provide for the approval of the Minerals Planning Authority, an Odour Management Plan.

This Odour Management Plan can also be used in support of applications to the Environment Agency under the Environmental Permitting (England & Wales) Regulations 2010, as amended, where there is a requirement to provide an Odour Management Plan.

This Odour Management Plan has been prepared in accordance with the requirements of the Environment Agency guidance for H4 Odour Management; How to comply with your environmental permit.

### 3 DEFINITIONS

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ALC:	Agricultural Land Classification
AONB:	Area of Outstanding Natural Beauty
BAT:	Best Available Technique
DECC:	Department of Energy and Climate Change
ha:	Hectare
HSE:	Health, Safety and Environmental
KM1:	Kirby Misperton 1 Well
KM8:	Kirby Misperton 8 Well
KMA:	Kirby Misperton A Wellsite
km:	Kilometres
MCERTS:	Environment Agency Monitoring Certification Scheme
SSSI:	Site of Specific Scientific Interest
VOC:	Volatile Organic Compounds
Odour:	

The term 'Odour' in this document refers to odours from those activities listed in Schedule 1 of Environmental Permit (EPR/DB3002HE) issued by the Environment Agency in April 2016 and potential odours generated from wellsite activities in support of the proposed operations which include;

- The management of extractive waste, not involving a waste facility;
- The management of extractive waste generated by well abandonment;
- The management of extractive waste by way of a waste facility for non-hazardous waste;
- The injection of hydraulic fracturing fluid to ground via KM8 well;
- Release of odour when breaking containment on pipework used in transporting produced fluid from the wellbore to surface storage tanks;
- Release of odour from storage of raw materials;
- Release of odour from site septic tanks and waste skips;
- VOC's from vehicles and site equipment exhaust systems;
- Fume emissions from chemicals used during operations; and
- VOC's from tanks and pipework.

Not all odours identified on site will be generated by these activities and therefore will not necessarily be identified in this Odour Management Plan i.e. odours generated from agricultural activities may be observed within the KMA wellsite boundary.

## 4 PLANNING AND ENVIRONMENTAL PERMIT CONDITIONS

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### 4.1 Compliance with Planning Consent

Third Energy operations are to be conducted in accordance with current planning consents and regulated by North Yorkshire County Council. This Odour Management Plan has been implemented for the proposed operations to be conducted at the KMA wellsite where there is a requirement to provide for the approval of the Minerals Planning Authority, an Odour Management Plan.

Third Energy submitted a planning application to North Yorkshire County Council in July 2015.

North Yorkshire County Council approved the planning application for the KMA wellsite and granted planning permission in May 2016 and subsequently issued a Decision Notice, reference C3/1500971/CPO also in May 2016.

Condition 26 of the Decision Notice sets out the requirement for the submission of an odour management plan and states:

*“Control of atmospheric emission – Odour Management Plan – plan to be submitted*

*Odour levels shall be assessed during the development according to a scheme having first been approved in writing by the County Planning Authority prior to the commencement of development.*

*Reason:*

*This is a pre-commencement condition and one which is considered warranted given the particular circumstances of this case and imposed in order to reserve the rights of control of the County Planning Authority in the interest of safe guarding the amenity of local residents and the local environment.”*

### 4.2 Compliance with Environmental Permit

The KMA wellsite is permitted under the Environmental Permitting (England & Wales) Regulations 2010, as amended, and regulated by the Environment Agency. An application for an environmental permit for the KMA wellsite was submitted by Third Energy to the Environment Agency and “Duly Made” in June 2015. The Environment Agency approved the environmental permit application for the KMA wellsite and issued Environmental Permit (EPR/DB3002HE) in April 2016.

The environmental permit details the conditions that the “Operator” (Third Energy) must comply with to ensure that activities conducted at the KMA wellsite do not impact on the environment. Section 3.3 of the KMA wellsite Environmental Permit (EPR/DB3002HE) details the odour conditions

that Third Energy must comply with to ensure protection of the environment and are detailed below:

- 3.3.1 *“Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour”.*
- 3.3.2 *“The operator shall:*
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified an odour management plan which identifies and minimises the risks of pollution from odour;*
  - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.”*

## 5 ODOUR MANAGEMENT PLAN

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### 5.1 Objectives of the Odour Management Plan

The primary objective of this Odour Management Plan is to prevent significant impacts from odour emissions on local amenities, human health and the environment. This objective will be achieved through:

- Identification of potential odour generating sources and activities;
- Implementation of odour mitigation measures;
- Implementation of an odour monitoring scheme;
- Procedures for the analysis and reporting of odour emissions; and
- Training of operational personnel on odour management techniques and their roles and responsibilities.

### 5.2 Distribution of the Approved Odour Management Plan

On commencement of the proposed operations, Third Energy will issue a copy of the approved Odour Management Plan to the Third Energy Site Supervisor (TESS). The Odour Management Plan may be issued as an electronic version or paper copy and a copy of receipt or transmittal will be recorded by Third Energy.

A copy of the Odour Management Plan is to be held within the TESS office, be available for review by regulatory bodies, be communicated to site personnel and a copy made available on site to all personnel during operations.

### 5.3 Alterations to the Odour Management Plan

No changes to, or deviations from, this plan are to be implemented until the required changes or deviations have been reviewed and approved by Third Energy. Alterations to the plan will be captured in an amended Odour Management Plan and submitted to the Minerals Planning Authority and the Environment Agency for approval, however, alterations may be implemented as an immediate control measure to resolve an identified odour problem prior to notification to the Minerals Planning Authority and the Environment Agency.

The TESS is responsible for ensuring that alterations are recorded within the Odour Management Plan, communicated to site personnel and a revised copy of the Odour Management Plan displayed onsite.

### 5.4 Odour Risk Assessment

An Odour Risk Assessment has been carried out prior to commencement of the pre-stimulation workover and the hydraulic fracture stimulation operation at the KMA wellsite and is included in Appendix 1 of this Odour Management Plan.

Third Energy will review the Odour Management Plan prior to each phase of operations to ensure that potential odour release points and the necessary control measures are identified.

## 5.5 Pre-Task Odour Risk Assessment

A Pre-Task Odour Risk Assessment will be undertaken by the TESS after mobilisation and installation of equipment to the KMA wellsite. The review will be undertaken prior to commencement of operations to identify any alterations or changes to processes, equipment or odour control measures that had originally been assessed in the Odour Risk Assessment. This may include alterations or changes due to equipment availability or equipment replacement etc.

If alterations or changes to the Odour Risk Assessment are identified, a revised Odour Risk Assessment will be produced and communicated by the TESS.

For clarity, this Odour Management Plan covers the following proposed operations to be conducted at the KMA wellsite:

- Pre-Stimulation Workover;
- Hydraulic Fracture Stimulation/Well Test;
- Production Test;
- Production; and
- Site Restoration.

## 5.6 Changes to Operations, Processes or Equipment

In the event that there are significant or material changes to operations, processes or equipment during the proposed operations, the TESS will review the Odour Management Plan.

Alterations to the plan will be captured in an amended Odour Management Plan and submitted to the Minerals Planning Authority and the Environment Agency for approval.

## 6 SOURCE MATERIALS

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### 6.1 Use of Alternative Products

Products known to emit odour or products that may emit odour when reacting with other products will be substituted where possible, for alternative non-odorous products which are deemed safe and effective. Service providers will be asked to provide non-odorous products where possible prior to mobilisation and commencement of operations.

If odorous products cannot be substituted these products will be identified prior to mobilisation and arrangements will be established for the containment and segregation of these products during transportation, storage, handling, use and disposal.

To ensure that the risk of odour emissions is minimised, quantities of products stored onsite that have the potential to emit odour are to be kept to a minimum where possible.

### 6.2 Identification of Odorous Products

An inventory of odorous products including description and quantities will be undertaken by service providers during initial mobilisation and installation. Inventories are to include all odorous liquid, solid and gaseous materials that have been mobilised and held onsite. Inventories of odorous products are to be recorded and a record held on site.

The TESS will collate service provider inventories and produce a consolidated odorous product inventory ensuring that it is updated on receipt/disposal of odorous products and a current copy is held within the TESS office and be available for review by regulatory bodies.

### 6.3 Use of Odorous Products

If there is a requirement for the use of or transferring of odorous products on site, control measures to eliminate or reduce potential odorous emissions detailed within this Odour Management Plan are to be followed. These include, but are not limited to:

- Containers are to be sealed when not in use;
- Spillage pads/containers are to be used to ensure any spillages are contained and can be remediated effectively and efficiently;
- Avoid direct sunlight where possible; and
- Reduce evaporation rate by eliminating air flow and surface area.

### 6.4 Storage Arrangements

Where possible, materials with the potential to emit odour shall be stored inside buildings/containers to reduce odour emissions.

Storage areas will be clearly marked and site personnel informed of specific storage requirements for individual areas when receiving site induction.

Where practicable, storage areas are to be protected from the effects of weather and ingress of water to prevent degradation of products, containers and sacks etc.

The TESS is to conduct regular checks of storage areas and products for potential leaks or damage to containers/sacks etc. Records of checks are to be held onsite within the TESS office and be available for review by regulatory bodies.

Due to the short duration of the hydraulic fracture stimulation operation it is not envisaged that operational products will be held onsite for a period of time that will allow for degradation of products.

## 6.5 Management of Storage Areas

The TESS is responsible for ensuring that storage areas are kept clean, tidy, monitored regularly for signs of odour, spillages, leaks, damage to containers or collection of surface water. Containers identified as leaking or damaged, are to be segregated and provisions implemented for the containment, immediate use or offsite disposal by an Environment Agency licensed waste carrier to an Environment Agency licensed waste facility.

## 6.6 Waste Storage

Waste products will be stored in a designated area onsite prior to offsite disposal by an Environment Agency licensed waste carrier to an Environment Agency licensed waste facility. Where practicable, enclosed skips will be used for storage of waste products. Where the use of enclosed skips is not practicable, these skips shall be covered to reduce the potential for odour emissions.

Skips identified as damaged are to be withdrawn from service and arrangements made for a replacement skip.

To ensure that potential reactions between waste products and degradation of waste is reduced or eliminated, waste will be segregated and stored in specific storage areas or waste receptacles prior to offsite disposal by an Environment Agency licensed waste carrier to an Environment Agency licensed waste facility.

Due to the short duration of proposed operations it is not envisaged that waste will be held onsite for a period of time that will allow for waste degradation and production of odorous emissions.

The TESS is to conduct regular checks of waste storage areas and a record of checks is to be held onsite within the TESS office and be available for review by regulatory bodies.

Third Energy will conduct regular audits on waste procedures to ensure compliance.

## 7 ODOUR RELEASES

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### 7.1 Identification of Odour Release Points

Odour Release Points have been identified within the Odour Risk Assessment undertaken prior to commencement of the operations at the KMA wellsite. Control measures for releases of potential odour are detailed within the Odour Risk Assessment included as Appendix 1 of this Odour Management Plan.

### 7.2 Controlling Evaporation of Odorous Products

In the event that odorous products cannot be substituted for non-odorous products, control measures will be implemented onsite to reduce the evaporation of products thus reducing the potential for odorous emissions. This will be achieved by chemical or physical methods as detailed below:

- Avoid direct sunlight or otherwise reducing the water evaporation rate and the release of dissolved odorous chemicals;
- Increase humidity in the immediate environment to reduce evaporation;
- Reduce air flow over the surface of odour-releasing materials thus reducing evaporation rate;
- Control acidity/alkalinity of materials to make them more soluble in water and therefore less likely to evaporate; and
- Reduce surface area of odorous materials thus reducing evaporation rate.

### 7.3 Containment of Odorous Emissions

There is the potential for odours to be contained within pipework and enclosed tanks of equipment used within the operations. Where practicable, pipework and enclosed tanks will remain sealed until cessation of operations thus reducing the likelihood of potential odorous emissions.

In the event that containment is to be broken on pipework or enclosed tanks, where possible, purging of the system is to be undertaken prior to breaking containment. Liquids used for purging are to be transferred to sealed tanks where odour treatment or offsite disposal by an Environment Agency licensed waste carrier to an Environment Agency licensed waste facility for odour treatment can be undertaken.

Tanks and pipework containing potential odorous emissions are to be checked on a regular basis by the service provider and the TESS for leaks and/or damage to the containment system. All checks are to be recorded and a record of checks is to be held within the TESS office and be available for review by regulatory bodies.

## 7.4 Odour Abatement Techniques

The preferred odour abatement technique during the proposed operations is the removal of the odorous product. Therefore, odorous products will be removed when safe and practical to do so and an alternative product is available.

Other abatement techniques which may be used are as follows;

- Adsorption using activated carbon;
- Absorption (scrubbing); and
- Odour treatment chemicals.

These methods can only be used once the method has been proved safe for the material being treated.

## 7.5 Dispersion

Meteorological monitoring will be undertaken to provide information on weather conditions including wind direction and wind strength. This will assist in local modelling for any air dispersion from the KMA wellsite and provide an early indication of any additional odour control measures that may be required.

## 8 ADDITIONAL CONTROL MEASURES

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### 8.1 Engineering Controls

Engineering controls eliminate or reduce exposure to odours through the use or substitution of engineered machinery or equipment. Third Energy will require, where possible, service providers to provide the Best Available Techniques (BAT) during the hydraulic fracture stimulation operations. BAT machinery and equipment will assist in eliminating potential odours at source using oil and gas industry engineering control measures which may include, but is not limited to the following:

- Equipment designed to minimise potential odours;
- Design the process to minimise potential odours;
- Use of non-odorous products; and
- Enclosed liquid systems with raised vents.

### 8.2 Equipment Design

Equipment provided by service providers are to meet current oil and gas industry BAT. Equipment identified as not meeting the required oil and gas industry BAT will be notified to the service provider and they will be asked to source alternative and available equipment to ensure compliance with current oil and gas industry BAT.

### 8.3 Maintenance and Servicing Procedures

To ensure that maintenance and servicing of equipment is kept to a minimum, Third Energy will request that general maintenance and servicing of equipment is conducted by service providers prior to mobilisation. This will ensure that the risk of potential odorous emissions during maintenance and servicing is reduced to a minimum and the potential for equipment failure is reduced.

If there is a requirement for maintenance or servicing of equipment on site, control measures to eliminate or reduce potential odorous emissions detailed within this Odour Management Plan are to be followed. These include, but are not limited to:

- Waste storage and or removal;
- Controlling evaporation of odorous materials;
- Containment of odorous emissions; and
- Odour mitigation techniques.

### 8.4 Promotion of Good Housekeeping

Third Energy promotes good housekeeping at all times ensuring that waste products are identified and the necessary actions for the storage and containment of waste products are implemented as soon as reasonably practicable. Housekeeping is part of the site induction process and housekeeping audits are to be undertaken on a regular basis by the TESS.

## 9 IMPACTS

### 9.1 Local Receptors

Receptors are classed in to the following categories:

- Low – Footpath or road;
- Medium – Industrial or commercial workplaces; and
- High – Housing, pubs, hotels etc.

The KMA wellsite is located within open countryside in the county of North Yorkshire, in the District of Ryedale and within the Parish of Kirby Misperton.

The nearest receptors are set out in Table 9.1 below.

Receptor Classification	Local Receptor	Distance from KMA wellsite
Low	Habton Road	180 metres South East
High	Marlin Bungalow	210 metres South
High	Kirby-O-Carr Farm	210 metres South
High	Alma Farm	300 metres West
High	Ashfield Caravan Park	500 metres North East
High	Glebe Farm	570 metres North
High	Tuffit Manor	700 metres South West
High	High Grange Farm	645 metres East
High	Manor Farm	1,120 metres North West
High	North West Farm	1,140 metres South East

*Table 9.1 Local Receptors*

The nearest settlements are Kirby Misperton, 700m to the North East and Little Barugh, 1.2 km to the North West.

There are no Local Wildlife Sites (LWS) identified within the local area, however an Area of Outstanding Natural Beauty (AONB), Howardian Hills is located 6 km to the South.

The KMA wellsite is not situated on or within a statutory or non-statutory designated site. There are eight (8) statutory designated sites located within the local area with the nearest, The Ings, which is a Site of Specific Scientific Interest (SSSI) located approximately 4 km South West. However, these have not been classed as sensitive receptors to odour emissions due to their distance from the site boundary.

The site is located within the Vale of Pickering which is a relatively low lying area of land. It is a predominantly agricultural landscape with pockets of woodland and interspersed hedgerows. The

farmland upon which the KMA wellsite is constructed has been given an Agricultural Land Classification (ALC) of three (3).

## 9.2 Community Tolerance

The KMA wellsite contains an existing well (KM1) which was constructed in 1985 and produced gas until it was recently plugged and abandoned. During the life cycle of the KM1 well, there were no reported odour complaints received from local neighbours which included a workover operation undertaken prior to its abandonment.

## 9.3 Impact Upon Community

Given that the pre-stimulation workover and hydraulic fracture stimulation operations are temporary and that the storage of materials and fluids onsite, which will give rise to the highest potential for odorous emissions, will be carried out over a period of 8 weeks, the impact on the local receptors is classed as minimal.

It is intended to conduct the production operation over a longer period of time, however the equipment onsite will be minimal to that of pipelines and some production equipment, all of which will remain sealed, with the exception of routine maintenance where necessary. The impact on the local receptors from routine maintenance is classed as minimal.

It is expected that the wellsite restoration works would be undertaken over a period of 6 weeks and the implementation of odour mitigation measures identified in the Odour Risk Assessment should ensure that the impact on the local receptors is classed as minimal.

## 10 ODOUR MONITORING

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Odour monitoring will be carried out by site personnel throughout the operations as detailed in Sections 10.2 and 10.3 of this Odour Management Plan.

To ensure the effectiveness of odour control measures, monitoring shall be undertaken immediately following the assessment and implementation of control measures. Thereafter, periodic monitoring shall be undertaken to ensure the continued effectiveness of such control measures.

### 10.1 Monitoring Techniques for Exploratory Operations

All monitoring techniques will be carried out in accordance with the requirements of the Environment Agency guidance for H4 Odour Management; *How to comply with your environmental permit* and may include the following techniques:

- Sniff testing;
- Complaints investigation;
- Odour diaries;
- Emissions monitoring; and
- Grab sampling of source emissions.

### 10.2 Steady State Odour Monitoring

To ensure that odour monitoring is conducted across the entire wellsite, steady state odour monitoring will be undertaken. This will provide real time monitoring and ensure the early detection of any potential odours.

All personnel working on the KMA wellsite shall receive steady state odour monitoring training and a record of training will be recorded by Third Energy.

Steady state odour monitoring shall be carried out by means of sniff testing. All site personnel will conduct periodic sniff testing during their shift and are to report odours perceived to be strong or odours not associated with standard wellsite operations as detailed within Section 11.1 of this Odour Management Plan.

### 10.3 Release Point Monitoring

Potential odour release points shall be identified on the Odour Risk Assessment and shall be monitored, by means of sniff testing, for potential odour emissions. Site personnel involved in odour release point monitoring shall receive 'odour release point monitoring' training from the Third Energy or Third Energy's independent air quality consultant.

If an odour perceived to be strong or odours not associated with standard wellsite operations are detected, the odour release point will be identified and where required, the necessary odour control measures implemented. To ensure that the odour control measures are sufficient, specific odour monitoring at the release point identified will be undertaken regularly throughout the operation.

## 10.4 Reporting and Recording of Odour Emissions

Due to the rural location of the KMA wellsite, there is the potential for odours not associated with the oil and gas industry, i.e. agricultural, to be identified within the wellsite or localised area.

To ensure that odours not associated with standard wellsite operations are recorded and identified, monitors are to report odours not associated with standard wellsite operations to the TESS using the 'Safety Observation card' reporting system.

Third Energy uses a "Safety Observation Card" reporting system during operations. Safety Observation Cards are completed by site personnel for reporting positive and negative observations throughout the operation. 'Safety Observation Cards' assist in the early detection of non-compliances, poor housekeeping, identification of odorous emissions, hazards and risks and are recorded and actioned as soon as reasonably practicable by the Wellsite Supervisor.

If an odour is reported, an investigation of the odour is to be undertaken as detailed in Section 11 of this Odour Management Plan.

A summary of the potential odour categories and relevant reporting procedures are detailed below.

**Strong odours** easily attributable to oilfield operations which have not previously been reported shall be reported to the TESS as soon as reasonably practicable and recorded on a 'Safety Observation Card'.

**Strong Odours** easily attributable to offsite activities should be reported to the TESS as soon as reasonably practicable and recorded on a 'Safety Observation Card'.

**All Odours** easily attributable to oilfield activities, which have previously been reported, should be reported to the TESS and recorded on a 'Safety Observation Card'.

**All other odours**, from the wellsite or offsite, should be reported to the TESS and recorded on a 'Safety Observation Card'.

## 11 ODOUR INVESTIGATION

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### 11.1 Odour Identification

As soon as reasonably practicable, once an odour from the operation has been reported, an investigation will be conducted by the TESS to determine the odour release point, odour source and the substance creating the odour. If the substance causing the odour cannot be identified, a sample of the odour will be taken either by means of point source sampling or grab sampling and sent for analysis at an MCERTS accredited laboratory.

### 11.2 Recording of Odour Emission Investigations

Each odour emission shall be recorded on the Third Energy Odour Report and Investigation Form and communicated to the Third Energy Management Team. The Third Energy Odour Report and Investigation Form shall include the following information:

- Date, time and location of odour;
- Weather conditions;
- Intensity of the odour;
- Receptor sensitivity;
- Duration of odour test conducted;
- Details of odour release points identified;
- Source of the odour;
- Description of the odour;
- Activities being undertaken at the time of odour detection;
- Odour control measures implemented;
- Method of sampling;

### 11.3 Point Source Sampling

Point source sampling will be undertaken when the substance causing the odour cannot be determined and will be undertaken by a competent and suitably qualified person. If a direct sample cannot be attained, grab sampling will be conducted in the immediate vicinity of the odour by a competent person. All samples will be transported to an MCERTS accredited laboratory for analysis under controlled conditions.

### 11.4 Odour Tracking

All odours reported during operations shall be recorded on the Third Energy Odour Report and Investigation Form and the Third Energy Action Log by the TESS to ensure that the complaint is tracked to conclusion and closed out.

The Third Energy Action Log where actionable, shall include all reports and investigations of the odour. The Third Energy Action Log may help identify, if any, potential sources of odour, prevent potential reoccurrences of odour and assist in the investigation of odour complaints.

## 12 TRAINING OF PERSONNEL

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All personnel involved in odour monitoring and odour management procedures will receive training prior to commencement of their responsibilities. Training will be undertaken by Third Energy and a record of training will be recorded by Third Energy.

## 13 ENGAGING NEIGHBOURS

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Third Energy communicates details of their activities to the local community via community liaison meetings. Third Energy is committed to engaging with local neighbours and will investigate all odour complaints reported as detailed in Section 14 below.

## 14 ODOUR COMPLAINTS

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In the event that a complaint is received by Third Energy from persons not associated with the exploratory operations, the complaint shall be investigated by Third Energy in accordance with Third Energy's complaints procedure. Complaints relating to the environment will be reported to the Environment Agency by Third Energy.

## 15 RECORDING ODOUR COMPLAINTS

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Odour complaints shall be recorded on the Third Energy Odour Complaint Report Form and an entry made in the Third Energy Action Log to monitor the frequency at which complaints are received. The Third Energy Odour Action Log shall include a subjective description of each complaint, allowing Third Energy to calculate the number of complaints relating to odour. The TESS is to record and investigate all odour complaints and communicate his findings and recommendations to Third Energy Senior Management.

## 16 INCIDENTS AND EMERGENCIES

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Incidents and emergencies may cause odour emissions. In the event of an incident or emergency site personnel are to follow onsite emergency procedures. All emergency actions must be carried out to make the wellsite and personnel safe in the first instance before dust emission assessments can be conducted.

## APPENDIX 1 – ODOUR RISK ASSESSMENT

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## Odour Risk Assessment

Source ID	Potential Odour Release Point	Potential Sources of Odour	Operations being carried out which may lead to odour emission	Receptor	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk	Responsible Person for Monitoring Release Point
KM8-001	Well Head	Used wellbore fluids	Circulating the well Killing the well	<b>Local Residents:</b> Habton Road – 180m South East Marlin Bungalow - 210m South Kirby-O-Carr Farm – 210m South Alma Farm – 300m West Ashfield Caravan Park – 500m North East Glebe Farm – 570m North Tuffit Manor – 700m South West High Grange Farm – 645m East Kirby Misperton - 700m North East Manor Farm – 1,120m North West North West Farm – 1,140m South East Little Barugh - 1,200m North West	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>• Ensure connections to well head fitted correctly.</li> <li>• Pressure test equipment prior to use.</li> <li>• Regular inspection of wellhead connections and pipes for failure or leaks.</li> <li>• Employ odour masking if necessary.</li> <li>• Identification of short term or long term odour sources.</li> </ul>	Negligible	Third Energy Site Supervisor
KM8-002	Well Head	Used wellbore fluids	Planned breaking of containment	<b>Local Residents:</b> Habton Road – 180m South East Marlin Bungalow - 210m South Kirby-O-Carr Farm – 210m South Alma Farm – 300m West Ashfield Caravan Park – 500m North East Glebe Farm – 570m North Tuffit Manor – 700m South West High Grange Farm – 645m East Kirby Misperton - 700m North East Manor Farm – 1,120m North West North West Farm – 1,140m South East Little Barugh - 1,200m North West	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>• Plan for breaking containment operations at cessation of operations.</li> <li>• Purge equipment prior to breaking containment.</li> <li>• Plug/cap tanks, pipes, hoses etc. after breaking containment.</li> <li>• Regular inspection of wellhead connections and pipes for failure or leaks.</li> <li>• Employ odour masking if necessary.</li> <li>• Identification of short term or long term odour sources.</li> </ul>	Negligible	Third Energy Site Supervisor
KM8-003	Well Head	Used wellbore fluids	Equipment failure	<b>Local Residents:</b> Habton Road – 180m South East Marlin Bungalow - 210m South Kirby-O-Carr Farm – 210m South Alma Farm – 300m West Ashfield Caravan Park – 500m North East Glebe Farm – 570m North Tuffit Manor – 700m South West High Grange Farm – 645m East Kirby Misperton - 700m North East Manor Farm – 1,120m North West North West Farm – 1,140m South East Little Barugh - 1,200m North West	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>• Well control procedures established and tested.</li> <li>• Equipment to be serviced/maintained prior to mobilisation.</li> <li>• Regular inspection of wellhead connections and pipes for failure or leaks.</li> <li>• Personnel inducted/trained on emergency response procedures.</li> <li>• Employ odour masking if necessary.</li> <li>• Identification of short term or long term odour sources.</li> </ul>	Negligible	Rig Manager / Third Energy Site Supervisor

KM8-004	Lubricator	Used wellbore fluids/lubricants	Wireline operations	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>• Ensure connections to well head are correctly fitted and pressure tested.</li> <li>• Regular inspection of equipment, pressure containment, packing, fluid containment etc.</li> <li>• Employ odour masking if necessary.</li> <li>• Identification of short term or long term odour sources.</li> </ul>	Negligible	Wireline Supervisor / Third Energy Site Supervisor
KM8-005	Wellbore liquid storage tanks and associated pipework	Used wellbore fluids	Storage of wellbore fluids	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>• Remove odorous fluids where possible offsite for odour treatment prior to disposal - Maintain well control capabilities.</li> <li>• Minimise flow through vents.</li> <li>• Use enclosed tanks where possible.</li> <li>• Avoid direct sunlight on open tanks.</li> <li>• Increase humidity to reduce evaporation.</li> <li>• Reduce air flow over surface of fluids.</li> <li>• Control acidity/alkalinity to make more soluble in water and therefore reduce likelihood of evaporation.</li> <li>• Reduce surface areas of fluids to minimise evaporation rate.</li> <li>• Employ odour masking if necessary.</li> <li>• Identification of short term or long term odour sources.</li> </ul>	Negligible	Rig Manager / Third Energy Site Supervisor
KM8-006	Wellbore liquid storage tanks and associated pipework	Used wellbore fluids	Planned breaking of containment	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>• Plan for breaking containment operations at cessation of operations.</li> <li>• Purge equipment prior to breaking containment.</li> <li>• Plug/cap tanks, pipes, hoses etc. after breaking containment.</li> <li>• Regular inspection of storage tanks and pipes for failure or leaks.</li> <li>• Employ odour masking if necessary.</li> <li>• Identification of short term or long term odour sources.</li> </ul>	Negligible	Rig Manager / Wellsite Supervisor
KM8-007	Wellbore liquid storage tanks and associated pipework	Used wellbore fluids	Equipment failure	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>• Tanks and associated pipework protected.</li> <li>• Well control procedures established and tested.</li> <li>• Personnel inducted/trained on emergency response procedures.</li> <li>• Equipment to be serviced/maintained prior to mobilisation.</li> <li>• Regular inspection of connections and pipes for failure or leaks.</li> <li>• Employ odour masking if necessary.</li> <li>• Identification of short term or long term odour sources.</li> </ul>	Negligible	Rig Manager / Third Energy Site Supervisor

KM8-008	Hydrochloric acid storage tanks and pipework	New/used hydrochloric acid	Storage hydrochloric acid	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>Remove odorous fluids where possible offsite for odour treatment prior to disposal.</li> <li>Minimise flow through vents.</li> <li>Use enclosed tanks where possible.</li> <li>Avoid direct sunlight on open tanks.</li> <li>Increase humidity to reduce evaporation.</li> <li>Reduce air flow over surface of fluids.</li> <li>Control acidity/alkalinity to make more soluble in water and therefore reduce likelihood of evaporation.</li> <li>Reduce surface areas of fluids to minimise evaporation rate.</li> <li>Employ odour masking if necessary.</li> <li>Identification of short term or long term odour sources.</li> </ul>	Negligible	Rig Manager / Third Energy Site Supervisor
KM8-009	Hydrochloric acid storage tanks and pipework	New/used hydrochloric acid	Planned breaking of containment	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>Plan for breaking containment operations at cessation of operations.</li> <li>Purge equipment prior to breaking containment.</li> <li>Plug/cap tanks, pipes, hoses etc. after breaking containment.</li> <li>Regular inspection of connections and pipes for failure or leaks.</li> <li>Employ odour masking if necessary.</li> <li>Identification of short term or long term odour sources.</li> </ul>	Negligible	Third Energy Site Supervisor
KM8-010	Hydrochloric acid storage tanks and pipework	New/used hydrochloric acid	Equipment failure	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>Tanks and associated pipework protected.</li> <li>Well control procedures established and tested.</li> <li>Personnel inducted/trained on emergency response procedures.</li> <li>Equipment to be serviced/maintained prior to mobilisation.</li> <li>Regular inspection of connections and pipes for failure or leaks.</li> <li>Employ odour masking if necessary.</li> <li>Identification of short term or long term odour sources.</li> </ul>	Negligible	Third Energy Site Supervisor
KM8-011	Storage/Process Areas	New/used chemicals	Storage/use of odorous products	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>Use of alternative non-odorous chemicals where possible.</li> <li>Containers are to be sealed immediately after use.</li> <li>Decanting/transfer of chemicals to be conducted inside buildings where possible.</li> <li>Spillages to be remediated as soon as reasonably practicable.</li> <li>Inspection of storage and work areas for signs of spillages.</li> <li>Employ odour masking if necessary.</li> <li>Identification of short term or long term odour sources.</li> </ul>	Negligible	Third Energy Site Supervisor

KM8-012	Storage Areas	New/used chemicals	Container failure	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>• Regular inspection of storage areas/containers for damage/leaks..</li> <li>• Storage containers identified as damaged/leaking used as priority or quarantined for offsite disposal..</li> <li>• Personnel inducted/trained on emergency response procedures.</li> <li>• Employ odour masking if necessary.</li> <li>• Identification of short term or long term odour sources.</li> </ul>	Negligible	Third Energy Site Supervisor
KM8-013	Storage areas	New/used materials	Reaction between materials	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>• Segregation of materials.</li> <li>• Minimise quantity of materials held onsite to prevent potential reactions.</li> <li>• Inspection of storage areas for signs of degradation/damage to containers/leaks.</li> <li>• Employ odour masking if necessary.</li> <li>• Identification of short term or long term odour sources.</li> </ul>	Negligible	Third Energy Site Supervisor
KM8-014	Storage areas	New/used materials	Degradation of materials	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>• Segregation of materials.</li> <li>• Minimise quantity of materials held onsite to prevent potential reactions.</li> <li>• Inspection of storage areas for signs of degradation/damage to containers/leaks.</li> <li>• Employ odour masking if necessary.</li> <li>• Identification of short term or long term odour sources.</li> </ul>	Negligible	Third Energy Site Supervisor
KM8-015	Site sewage tank	Sewage and waste water	Storage of sewage and waste water	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>• Monitor levels to prevent spillage.</li> <li>• Regular inspection of tanks, connections and pipes for failure or leaks.</li> <li>• Employ odour masking if necessary.</li> <li>• Identification of short term or long term odour sources.</li> </ul>	Negligible	Third Energy Site Supervisor

KM8-016	Site sewage tank	Sewage and waste water	Planned breaking of containment	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>Plan for breaking containment operations at cessation of operations.</li> <li>Purge equipment prior to breaking containment if required.</li> <li>Plug/cap tanks, pipes, hoses etc. after breaking containment.</li> <li>Regular inspection of tanks, connections and pipes for failure or leaks.</li> <li>Employ odour masking if necessary.</li> <li>Identification of short term or long term odour sources.</li> </ul>	Negligible	Third Energy Site Supervisor
KM8-017	Site sewage tank	Sewage and waste water	Equipment failure	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>Tanks and associated pipework protected.</li> <li>Personnel inducted/trained on emergency response procedures.</li> <li>Equipment to be serviced/maintained prior to mobilisation.</li> <li>Regular inspection of tanks, connections and pipes for failure or leaks.</li> <li>Employ odour masking if necessary.</li> <li>Identification of short term or long term odour sources.</li> </ul>	Negligible	Third Energy Site Supervisor
KM8-018	Site sewage tank	Sewage and waste water	Transfer of sewage and waste water to road tanker haulage vehicle	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>Ensure correct connections.</li> <li>Pipes used within the transfer to be capped after use.</li> <li>Tanks sealed after transfer.</li> <li>Employ odour masking if necessary.</li> <li>Identification of short term or long term odour sources.</li> </ul>	Negligible	Third Energy Site Supervisor
KM8-019	Site waste skips	General waste including food	Storage of general site waste prior to offsite disposal	<p><b>Local Residents:</b>  Habton Road – 180m South East  Marlin Bungalow - 210m South  Kirby-O-Carr Farm – 210m South  Alma Farm – 300m West  Ashfield Caravan Park – 500m North East  Glebe Farm – 570m North  Tuffit Manor – 700m South West  High Grange Farm – 645m East  Kirby Misperton - 700m North East  Manor Farm – 1,120m North West  North West Farm – 1,140m South East  Little Barugh - 1,200m North West</p>	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>Monitor waste levels to prevent overfilling/spillage.</li> <li>Personnel inducted on waste procedures.</li> <li>Segregation of waste.</li> <li>Equipment to be serviced/maintained prior to mobilisation.</li> <li>Regular inspection of tanks, connections and pipes for failure or leaks.</li> <li>Employ odour masking if necessary.</li> <li>Identification of short term or long term odour sources.</li> </ul>	Negligible	Third Energy Site Supervisor

KM8-020	Skips and receptacles used for waste storage	General waste including food	Equipment failure	<b>Local Residents:</b> Habton Road – 180m South East Marlin Bungalow - 210m South Kirby-O-Carr Farm – 210m South Alma Farm – 300m West Ashfield Caravan Park – 500m North East Glebe Farm – 570m North Tuffit Manor – 700m South West High Grange Farm – 645m East Kirby Misperton - 700m North East Manor Farm – 1,120m North West North West Farm – 1,140m South East Little Barugh - 1,200m North West	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>• Site skips to provide protection.</li> <li>• Equipment to be serviced/maintained prior to mobilisation.</li> <li>• Personnel inducted/trained on emergency response procedures.</li> <li>• Regular inspection of tanks, connections and pipes for failure or leaks.</li> <li>• Employ odour masking if necessary.</li> <li>• Identification of short term or long term odour sources.</li> </ul>	Negligible	Third Energy Site Supervisor
KM8-021	Various - within the site boundary	Odorous products	Spillages	<b>Local Residents:</b> Habton Road – 180m South East Marlin Bungalow - 210m South Kirby-O-Carr Farm – 210m South Alma Farm – 300m West Ashfield Caravan Park – 500m North East Glebe Farm – 570m North Tuffit Manor – 700m South West High Grange Farm – 645m East Kirby Misperton - 700m North East Manor Farm – 1,120m North West North West Farm – 1,140m South East Little Barugh - 1,200m North West	Air - Prevailing winds from south west (average statistics from the Met Office)	Low	Low	Low	<ul style="list-style-type: none"> <li>• Spillages to be remediated as soon as reasonably practicable.</li> <li>• Use of vacuums to remediate spillages.</li> <li>• Personnel inducted/trained on emergency response procedures.</li> <li>• Notification to emergency services of commencement of operations on mobilisation.</li> <li>• Used spillage equipment to be segregated and contained to prevent odour prior to offsite disposal.</li> </ul>	Negligible	Third Energy Site Supervisor

### Risk Matrix

	Probability very low	Probability low	Probability medium	Probability high
Consequence very low	Negligible	Negligible	Low	Medium
Consequence low	Negligible	Low	Medium	Medium
Consequence medium	Low	Medium	Medium	High
Consequence high	Medium	Medium	High	High