



# **Environmental Management System- Procedure**

## **Odour Management Plan**


**July 2019.v1**

**Document uncontrolled if printed.**

The information contained in this document is the property of the Company. The contents of this document cannot be reproduced or disclosed wholly or in part or used for the purposes other than that which it is supplied without prior written permission of the Company.

**2 Sisters Food Group**  
**Document Authorisation Form**

<b>Document Number:</b>	2SFG EMS 096
<b>Title:</b>	Odour Management Plan
<b>Issue Number:</b>	1
<b>Date of Issue:</b>	July 2019

<b>Approved:</b>	Phil Kelly
<b>Signed:</b>	
<b>Date:</b>	29/07/19

<b>Changes:</b>
<u>18/11/2022 – Jodie Harris</u>
<u>25/06/2023 – J. Harris:</u>
- Currently using a different method of Cat-3 disposal due to structural issues.

Ref	Issue No	Enquiries To	Authorised By	Date of Issue	Page No
2SFG 096	V1.0	Aydn Loffman	Phil Kelly	July 2019	Page 2 of 10

## 1.0 Purpose:

To identify potential odour sources and their receptors, and outline control measures to reduce the risk of nuisance on our neighbours.

## 2.0 Scope:

Any potentially odorous materials.

## 3.0 Responsibility:

The Site Health, Safety and Environment manager and environmental Assistant are responsible for this procedure, with support from the Despatch Manager and Amber Ltd representative to ensure that processes and procedures are being followed. Monitoring and auditing of this procedure and its effectiveness will be undertaken by the Health, Safety, and Environment team.

## 4.0 Notable changes:

Recently, our method of Cat-3 collection has been changed due to structural and external issues concerning Avian influenza which has affected exportation and delivery methods of Animal By Products (ABP).

Ref	Issue No	Enquiries To	Authorised By	Date of Issue	Page No
2SFG 096	V1.0	Aydn Loffman	Phil Kelly	July 2019	Page 3 of 10

## 5.0 Procedure:

Due to the nature of operations on site, there are processes that have the potential to generate odour that must be controlled under environmental legislation, and as part of the Environmental Permit. The following will detail the potential sources of odour, receptors, how we manage it, monitor it, and how we respond to complaints.

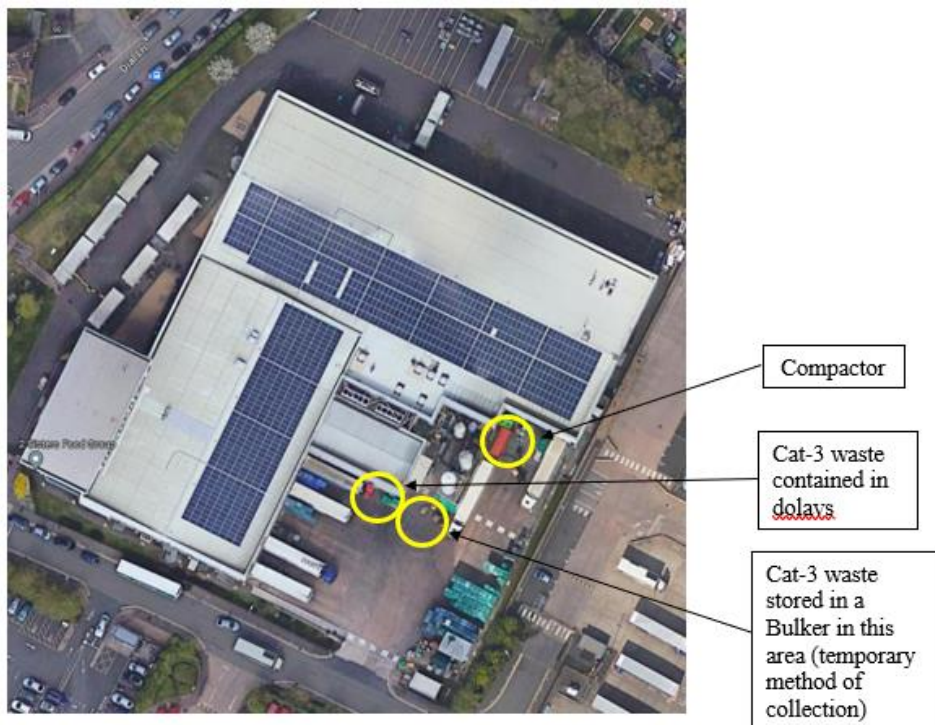
### 5.1 Odour Sources

Potential sources of odour have been reviewed internally and identified; as a packing site, our risk to odour originates from the following:

- General waste compactor
- APB, (CAT-2 and CAT-3) stored in dolavs.
- Bulker (CAT-3)

A significant element of limiting our odour nuisance is waste management. To understand how we manage waste, refer to the waste and reporting procedure found in the EMS.

The site image below details the location of the odour sources, all situated in the yard in the southeastern area of the site.

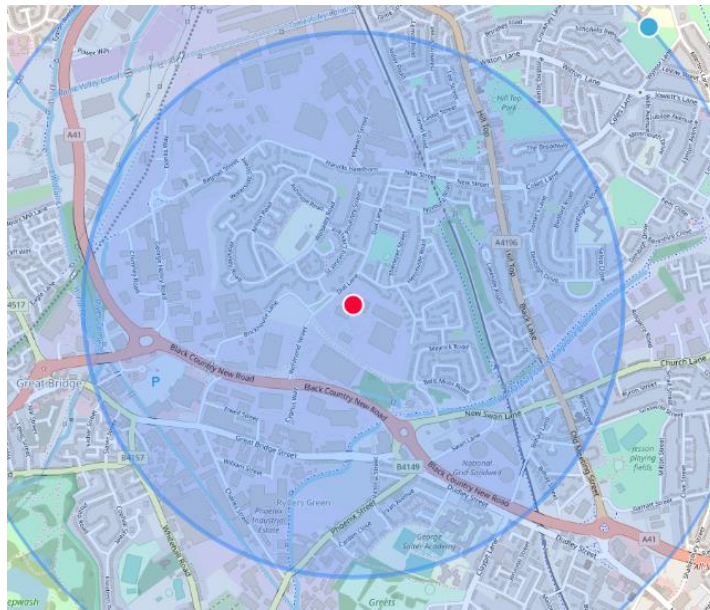


Map 1: External Waste Storage

Ref	Issue No	Enquiries To	Authorised By	Date of Issue	Page No
2SFG 096	V1.0	Aydn Loffman	Phil Kelly	July 2019	Page 4 of 10

## 5.2 Receptors

The map below shows the diameter of potential receptors, whilst unlikely, certain conditions i.e., heavy wind and unusually potent odour, could facilitate odour pollution for those residing in distant areas.



Map 2: Site D 1km Radius

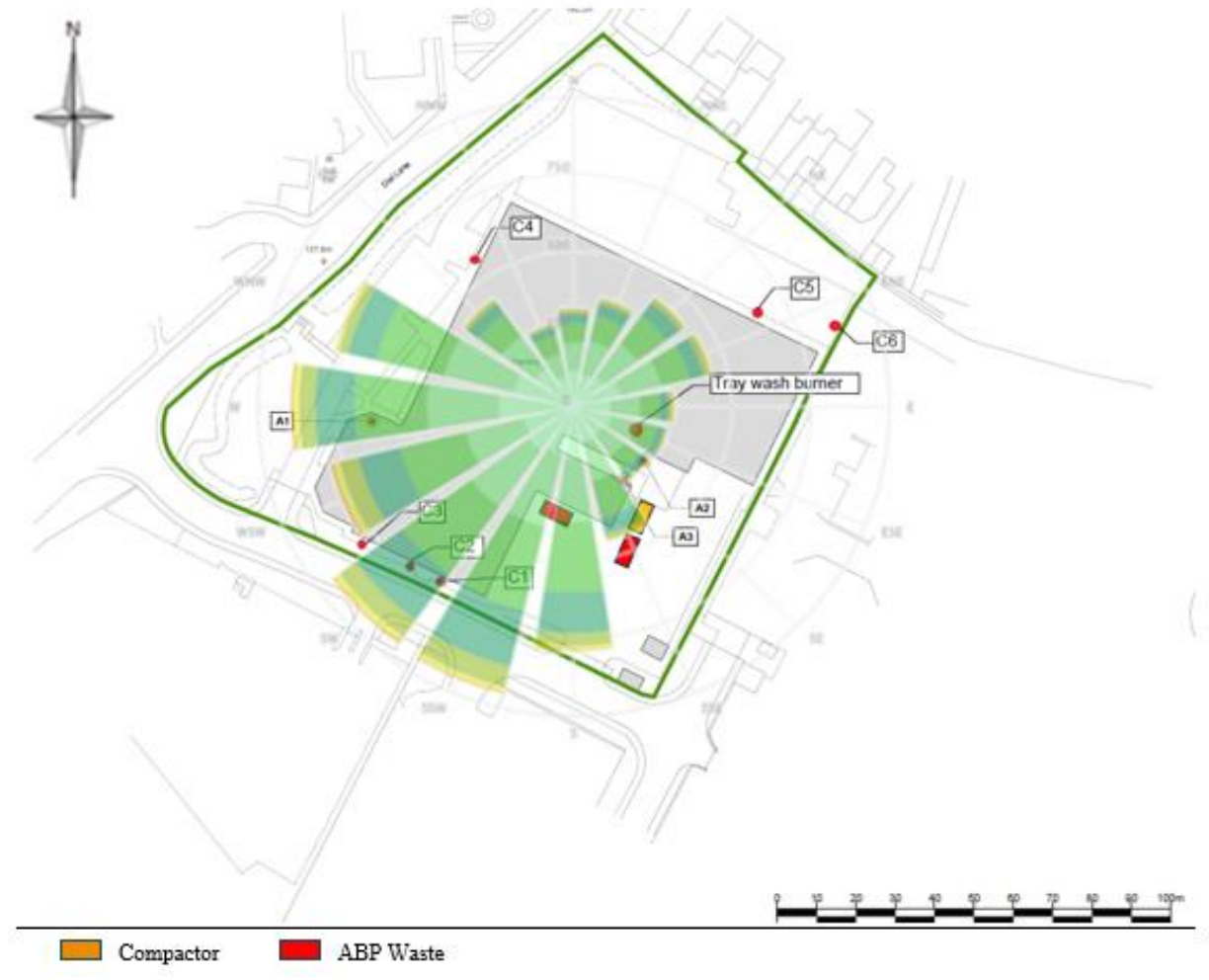
The following table identifies possible receptors, their location and distance from the site to odour nuisance, it is in order of risk (high-low) based on the wind rose which can be seen below (pg. 7).

Receptor		Distance and Direction
R1	Residents at Dial Lane, Ebenezer Street, Hawkestone Crescent	100-200m neighbouring residential streets Northwest - North-East
R2	Residents along Black Lake	649m East
R3	Residents at Hill Top	612m North-East
R4	Harvill's Hawthorn Primary School	332m North-West
R5	Golds Hill, Harvill's Hawthorn, Bagnall Street	503m North-West to North
R6	Carlisle Business Park	421m South
R7	Swan Village	462m South

Ref	Issue No	Enquiries To	Authorised By	Date of Issue	Page No
2SFG 096	V1.0	Aydn Loffman	Phil Kelly	July 2019	Page 5 of 10

## 5.3 Geographical Considerations

Map 4 shows the site odour sources, and a wind rose for the area. The wind rose shows the directional source of the wind around the site, predominantly coming from between South South-West and West North-West. This means that the area's most likely to be affected will be in the Northern and Eastern areas of site, and odour will most likely travel further in those directions in the event of strong winds. However, all neighbouring residents could be effective by odour if it is not correctly managed.



Map 3: Wind Rose

Ref	Issue No	Enquiries To	Authorised By	Date of Issue	Page No
2SFG 096	V1.0	Aydn Loffman	Phil Kelly	July 2019	Page 6 of 10

## 5.4 Prevention Strategy

All potential pollution sources are controlled by preventative maintenance regimes.

### 5.4.1 Waste - CAT-3:

Due to Avian influenza, our process for waste has changed temporarily. Site are having to handle a higher volume of CAT-3 waste, dolavs of Cat-3 waste are emptied into a bulker in the yard, the bulker is collected twice daily. Whilst awaiting collection, the bulker is covered.

The dolav containers are all lidded inside the by-products room to contain any potential odour whilst awaiting collection. If in any circumstance any waste from the dolav's is spilled, it is cleaned immediately to prevent odour pollution.

### 5.4.2 General Waste:

Our waste is stored in an enclosed compactor which prevents odorous pollution. The waste is loaded into the compactor through an enclosed chute. The general waste from the compactor is collected 3 times weekly to prevent a build-up of waste and thus odour.

### 5.4.3 New Business:

Should any developments occur that increases the risks of odour pollution, they will be reviewed prior to implementation and any required control measures will be implemented.

### 5.4.4 Monitoring

Environmental walks are executed by site's environmental assistant usually on a daily basis to identify and prevent any abnormal practises that may result in odour pollution, this includes checking that waste management procedures are being correctly followed. During the walk around site and external boarder, a sniff test is conducted to check for any abnormal smells that may require investigation. Yard and Factory staff are also aware of the sniff test and incorporate it into their daily tasks.

Yard and factory members are instructed to report any abnormal smells to the environmental assistant for further investigation.

## 6.0 Complaints

If a complaint is received directly to the site, an initial investigation will be conducted immediately to determine if there is an odour issue and initiate correct actions. A full investigation will be conducted promptly to determine causal factors and their root cause(s), The full complaints response procedure can be found in the EMS (071 Environmental Incident Reporting and Investigation, within 'Operations')

Once the investigation is complete, the appropriate corrective actions are taken, which are tracked in a corrective action tracker. All complaints (directly to the company or through the Local Authority or Environment Agency) are recorded within a log on the site EMS.

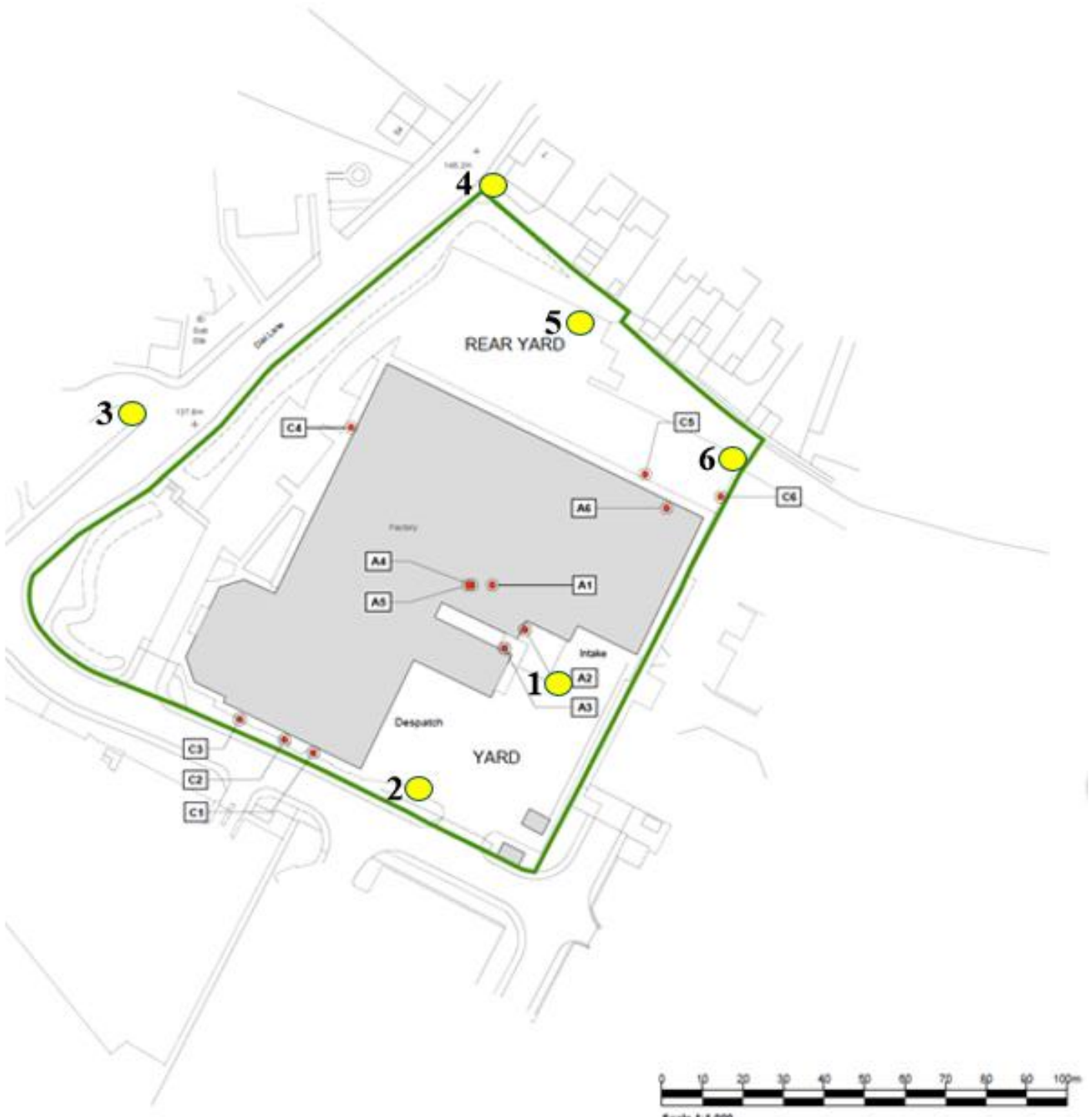
Ref	Issue No	Enquiries To	Authorised By	Date of Issue	Page No
2SFG 096	V1.0	Aydn Loffman	Phil Kelly	July 2019	Page 7 of 10

### 6.1 Step by step procedure in event of an unexpected discharge to atmosphere: following the Stop, Contain, Notify model.

1. Stop where possible- Stop the source of the odour - Where safe to do so the Site should stop the incident taking place- however in cases of odorous emissions due to their potentially hazardous nature this **MUST** only be done by **approved and suitably trained engineers**.
2. Contain – If the odour cannot be stopped, by eliminating the cause, it must be contained, through removal, relocation, or covering.
3. Notify- The severity of the incident should be assessed, to identify the correct people to notify.
  - a. Notify the following;
    - i. During office hours (8:00 – 16:00), Andrew Powell (SHE Manager), or Jodie Harris (Environmental Assistant)
    - ii. Out of hours: Security
  - b. With following details
    - i. Date/time
    - ii. Location
    - iii. Materials/substances involved
    - iv. Quantity involved
    - v. Immediate actions taken
  - c. The persons notified will then conduct a sniff test will be conducted in the areas displayed on Map 4 below (points marked 1-6) covering high risk areas of sources and receptors. The investigator must stay at each location for 5 minutes.
4. Refer to 071 Environmental Incident reporting and investigation procedure for further details.

Ref	Issue No	Enquiries To	Authorised By	Date of Issue	Page No
2SFG 096	V1.0	Aydn Loffman	Phil Kelly	July 2019	Page 8 of 10





Map 4: Sniff test locations

Ref	Issue No	Enquiries To	Authorised By	Date of Issue	Page No
2SFG 096	V1.0	Aydn Loffman	Phil Kelly	July 2019	Page 9 of 10



# Odour Management Plan

## 7.0 Review

An internal review of odorous sources will be conducted at least annually by the site Environmental Assistant. Next review due November 2024.

Should any new or altered processes be planned, that increases the risks of odour pollution, it will be assessed prior to any change, any required control measures will be implemented.

Ref	Issue No	Enquiries To	Authorised By	Date of Issue	Page No
2SFG 096	V1.0	Aydn Loffman	Phil Kelly	July 2019	Page 10 of 10