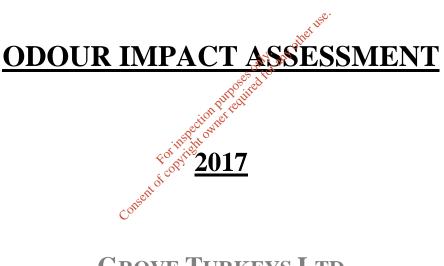


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GROVE TURKEYS LTD SMITHBOROUGH CO. MONAGHAN

INDUSTRIAL EMISSIONS LICENCE NO: P0832-01

| Report No: | NA_17_8809 | Date: | 17 th July 2017 |
|------------|--|----------|----------------------------|
| Author: | Maria Ward, BSc. Martin O'Looney, BSc | Checked: | Mike Fraher, Director |

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APPENDIX C - MONAGHAN WIND ROSE DIAGRAM

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EXECUTIVE SUMMARY

Panther Environmental Solutions Ltd was commissioned to carry out an odour assessment at Grove Turkeys Ltd, Monaghan and at odour monitoring locations around the facility. The survey was carried out on Wednesday 28th June 2017.

The EPA guidance document "*Odour Impact Assessment Guidance for EPA Licensed Sites* (*AG5*)" was consulted as part of the preparation of this report. Odour monitoring was conducted, as per the "sniff testing" methodology outlined within the EPA Guidance Note (AG5).

Weather conditions during the odour survey were mild (12-14°C), with scattered showers, scattered cloud and light breezes (3-6 knots). Wind direction was somewhat variable during the ten-minute survey periods; however, the dominant wind direction was from the north-east. Due to intermittent rain, the transmission of odours from the site was supressed.

Potential sources of odours within the site were identified and included the Refrigeration room, Kill area, Burger Plant, Spice Store, Offal room, CAT 3 Skip, Sludge Trailer, Screw Press, Effluent Sumps and Effluent Plant Tanks.

The majority of odour plumes were confined within the site boundary during the odour assessment. Odours from the offal shed were detected at the western-most boundary of the facility. The offal type odours were faint and very intermittent in the variable wind. These odours were no longer detected at the site boundary when the curtain door/screen on the offal shed was closed.

Those odours which were noted at the site boundary were intermittent and faint, and therefore would be below the threshold that would be likely to cause a nuisance, as defined by the EPA AG5 Guidance

As a result of this odour assessment, it is concluded that the odour emissions from the Grove Turkeys facility were not found to be contributing odours which would significantly impact upon amenity at odour sensitive locations.

It is also recommended that an Odour Management Programme, as per Appendix B, be prepared and implemented by the site, and integrated into the existing environmental management system and reviewed annually.

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1.0 INTRODUCTION & SCOPE OF WORK

Grove Turkeys Ltd operates a turkey processing plant at Smithborough, Co. Monaghan. The installation produces turkey burgers and turkey portions along with whole turkeys. This installation is licensed under the Industrial Emissions Licence system (Reg. No. P0832-01).

The site is licensed by the Environmental Protection Agency (EPA) to carry out the following activities:

7.4.1 "The operation of slaughterhouses with a carcass production capacity greater than 50 tonnes per day".

The recovery or disposal of waste in a facility within the meaning of the Act of 1996, which facility is connected or associates with another activity specified in this Schedule in respect of which a licence or revised licence under Park IV is in force or in respect of which a licence under the said Part is or will be required.

7.8(a)(i) "The treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed from: only animal raw materials (other than exclusively milk) with a finished product production capacity greater than 75 tonnes per day; For the purposes of clause (a), packaging shall not be included in the final weight of the product. Clause (a) shall not apply where the raw material is milk only"

Condition 5 of the sites IED licence relates to the control of emissions from the activity, which includes the control of odours as follows;

5.2 "No emissions, including odours, from the activities carried on at the site shall result in an impairment of, or an interference with amenities or the environment beyond the installation boundary or any other legitimate uses of the environment beyond the installation boundary."

Panther Environmental Solutions Ltd was commissioned to carry out an odour assessment within the site and at odour monitoring locations around the site. The survey was carried out on Tuesday 27th June 2017.

The EPA guidance document "Odour Impact Assessment Guidance for EPA Licensed Sites (AG5)" was consulted as part of the preparation of this report.

The main aims of this Odour Impact Assessment included:

- 1. Description of odour and the odour monitoring methodology used.
- 2. Detailing the locations for odour monitoring stations.
- 3. Detailing the odour measurements obtained.
- 4. Discussion, Conclusions & Summary.
- 5. Odour Management Programme.

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2.0 LEGISLATION PERTAINING TO ODOURS IN IRELAND

Appendix II Information on odours pertaining to the facility odour impact assessment.

The Public Health Act of 1878 introduced legislation to control nuisance in Ireland, but its execution only became viable after the implementation of the Planning and Development Act (1963) (Scannell, 1995). Any industry producing a nuisance was controlled under these regulations and subsequent pressure from environmental lobby groups together with the development of scientific measurement techniques made it practical to quantify and control the release of gaseous environmental pollutants from these enterprises.

Odour impact from any facility on the surrounding vicinity may be considered a nuisance. Section 107 of the Public Health Act 1878 states that "Sanitary authorities are bound to inspect their district for nuisances." Upon the receipt of any information respecting the existence of a statutory nuisance, the sanitary authority is obliged, if satisfied of the existence of the nuisance, to serve an abatement notice on the person by whose act or default the nuisance arises or continues or, if such a person cannot be found, on the owner or occupier of the premises on which the nuisance arises" (Scannell, 1995).

In order to control the possible pollution effects of large developments, relevant legislation was enacted under the Environmental Protection Agency (EPA), Act of 1992. Waste licensing and Integrated Pollution Control Licensing (IPC) (now IED and IPPC) for specified facility types was implemented in 1996 by the EPA and the related guidance note was termed BATNEEC (Best Available Technology Not Entailing Excessive Cost) (i.e. now BAT which complement the BATNEEC Notes) (EPA, 1996). It set out specific conditions for these industries (i.e. Intensive Agricultural Production, Landfills, Waste transfer stations, etc.) to be implemented in order to comply with the environmental requirements of the EPA.

Minimisation of odour emissions and complaints is one of the requirements of the BATNEEC Guidance Note for industries likely to cause odour emissions. For example, a typical IPC license/Waste license condition states "that there shall be no emission to the atmosphere of environmental significance and that all operations on site shall be carried out in a manner such that air emissions and/or odours do not result in significant impairment and/or interference with amenities beyond the site boundary and at odour sensitive locations in the area" (EPA, 1996).

Local authorities and the EPA have responsibility for ensuring enterprises meet their planning and environmental requirements. Where these facilities are found to be causing odour nuisance, local government enforces Section 29 of the 1987 Air Pollution Act and serves the offenders with an abatement notice. If the facility is licensed as an IPPC or Waste enterprise, the EPA can enforce the conditions of the license and either serve the facility with noncompliance for odour detected beyond the site boundary or prosecute the facility and seek a high court injunction to close the facility. Verification for the presence of odour nuisance usually encompasses the licensing officer visiting the facility and detecting the odour beyond the boundary.

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3.0 MONITORING SURVEY

3.1 METHODOLOGY

The 2010 agency guidance document "*Odour Impact Assessment Guidance for EPA Licensed Sites (AG5)*" has been used as the basis for the methodology for this assessment.

Unlike certain airborne pollutants, odour in ambient air cannot be measured by conventional chemical analyses. Odours are in most cases a complex cocktail of various substances that have intricate synergistic effects upon each other. The measurement of individual compounds in ambient air will therefore not provide useful information on the character of an odour within that air.

Such techniques involving the use of instrumentation and/or analytical methods to identify and quantify specific odorous compounds may not provide any real insight into the intensity or offensiveness of odours in human terms. The threshold concentration, for example, of many odorants is often well below their analytical detection limit and hence many odours may be deemed to be causing nuisance, although the compounds responsible for the odours are not being detected by chemical techniques.

Furthermore, interactions between mixtures of odorants may lead to synergistic or antagonistic effects, leading to difficulties in linking analytical and sensory measurements for impact assessment purposes.

Olfactometry using the human sense of odour is the most valid means of measuring odour (Dravniek et al, 1986) and at present is the most commonly used method to measure the concentration of odour.

Representative sampling for olfactometry analysis of air may be suitable for point source emissions or at times ambient assessments on a site (i.e. within a site's boundary), however sampling air beyond a site boundary for olfactometry purposes is highly unlikely to be representative of odour impact.

Due to the unsuitability of the above measurement approaches, the EPA guidance AG5 procedure describes a "sniff testing" approach to odour assessment. This requires a human assessor to use their own sense of odour to assess odours by means of a sensory technique referred to as "sniff testing".

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3.2 MEASUREMENT PARAMETERS

The following key describes the numerical values used to describe observation point sensitivity, wind strength, odour persistence, and odour intensity as per the Agency Guidance Document 2010 (AG5).

| 0 Remote (no housing, commercial/industrial premises or public area within 500m of observation point) 1 Low sensitivity (no housing, commercial/industrial premises or public area within 10 observation point) 2 Moderate sensitivity (housing, commercial/industrial premises or public area within 10 observation point) 3 High sensitivity (housing, commercial/industrial premises or public area within area observation point) 4 Extra sensitive (complaints arising from residents, businesses and users of public area area of observation point) 4 Extra sensitive (complaints arising from residents, businesses and users of public area area of observation point) 5 Vend Strength 0 Calm Smoke rises vertically 1 Light air Direction of wind is shown by smoke drift, but not wind-vanes. 2 Light Breeze Wind felt on face; leaves rustle, ordinary vane moved by wind. 3 Gentle Breeze Leaves and small twigs in constant motion. 4 Moderate Breeze Small trees in leaf begin to sway. 6 Strong Breeze Large branches it motion; umbrellas used with difficulty against 7 Near Gale Whole trees; progress generally impeded. 9 Strong Gale Slight structural damage occurs (chimmey pots and slates remove | | | | | | | |
|--|---|--|--|--|--|--|--|
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| 2 Persistent (detected throughout the period of assessment) Note 5: Odour Intensity | | | | | | | |
| Note 5: Odour Intensity | | | | | | | |
| | | | | | | | |
| 0 No detectable odour | | | | | | | |
| | | | | | | | |
| 1Faint Odour (barely detectable, need to stand still and inhale facing the wind) | | | | | | | |
| 2 Moderate Odour (easily detectable while walking and breathing normally, possibly of | ffensive) | | | | | | |
| 3 Strong Odour (bearable but offensive – might make clothes / hair smell?) | | | | | | | |
| 4 Very Strong Odour (unbearable, difficult to remain in area affected by odour) | | | | | | | |

Wind direction is given as "the direction from which wind blows" as per Agency Odour Investigation Field Record Sheets.

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3.3 MONITORING LOCATIONS

Odour source locations were selected during the survey period in order to provide for the drawing of an indicative odour plume for each survey, as per EPA (AG5) guidance. A total of 13 odour monitoring locations and 17 odour source locations within the site were monitored on the day of the assessment.

3.4 MEASUREMENT RESULTS

The detailed results of monitoring are provided within the Odour Investigation Field Record Sheet in Table 3.1 below, which are based upon the 2010 EPA guidance document "Odour Impact Assessment Guidance for EPA Licenced Facilities (AG5)".

An odour assessment was carried out at odour source location and monitoring locations on Wednesday 28th June 2017.

Monitoring was conducted by Martin O'Looney and Maria Ward of Panther Environmental Solutions Ltd.

-, and Maria W

Table 3.1:Odour Monitoring Results

| General | Reference | tion | Assessment h | ру | | | Date of Assessment | | | |
|--|---|--|--|----|--|---|--|---|---|--|
| | OS_17_8809 | Grove Tur | Grove Turkeys Ltd, Smithborough, Co. Monaghan | | | Your Name: Martin O'Looney Other Investigators present: Maria Ward | | 28/06/2017 | | |
| Pre– Assessment Preparation | medical cond (cold, sore the trouble)? | cold, sore throat, sinus ouble)?flavoured drinks, scented toiletries and deodorisers?verification other (spec | | | | - Complaint assessment locations been attached? fy). | | | Weather Conditions Note 3 (record wind info on page 2) Dry, overcast, rained during the night, warm, slight breeze | |
| Notes (the ranking systems in these notes must be used when completing the field observations table overleaf) | Note 1: Observation point Sensitivity (assuming detectable, if not then 0) Note 1: Observation point Sensitivity (assuming detectable, if not then 0) Note 1: Observation point Sensitivity (assuming detectable, if not then 0) Note 1: Observation point Sensitivity (assuming detectable, if not then 0) Note 1: Observation point Sensitivity (assuming detectable, if not then 0) Note 1: Observation point Sensitivity (assuming detectable, if not then 0) Note 1: Observation point Sensitivity (assuming detectable, if not then 0) Note 1: Observation point 1 Low sensitivity (no housing, commercial/industrial premises or public area within 100m of observation point) Note 4: Odour Per 00 No Colur 3 High sensitivity (housing, commercial/industrial premises or public area within area of observation point) Note 4: Odour Per 00 No Odour 4 Extra sensitive (complaints arising from residents, businesses and users of public area within area of observation point) Note 5: Odour Interview 0 Calm Smoke rises vertically Output the full of | | | | | | mperature – cold, cool, wa ote 4: Odour Persis No Odour Intermittent (detected inter Persistent (detected throug ote 5: Odour Inten No detectable odour Faint Odour (barely detects wind) Moderate Odour (easily de normally, possibly offensiv Strong Odour (bearable bu Very Strong Odour (unbea | night, warm, slight breeze onditions recently, drizzle, raining, foggy warm, hot sistence termittently during the period of assessment) ughout the period of assessment) ensity exctable, need to stand still and inhale facing the detectable while walking and breathing | | |
| ource ation dour y) | Start Time | No odours were detected at offsite locations during the | | | | | List areas inspected | | ctivities were occurring on- ff-site odour assessment? | |
| Odour Source Investigation (Post Odour Survey) | Finish Time 15.10pm | Potential o Refrigerati | All Areas All Ar | | | | k, Aeration Tank, Spice | | tions: deliveries; truck roduct and waste storage. | |

| Parameter | Name of household / commercial site (describe so that location can be easily identified again by a third party) | Sensitivity (1-5) Note 1 | Direction from which wind blows | Orientation (Observer Vs. facility) | Strength Note 2 | Start Time (24hr clock) | Period of observation | Odour Persistence (0- 2) Note 4 | Odour Intensity (0-4) Note 5 | Description of any odours, other source(s) of odours etc. (Also note variable weather conditions etc.) |
|---|--|-----------------------------|---------------------------------------|--|--------------------|----------------------------|--------------------------|---|------------------------------------|---|
| Thresholds that could indicate nuisance | | ≥3 | | Down-Wind Approx. DW or not detectable etc. | | | mins | 1 or 2 | ≥2 | Guide- A location where the score meets or exceeds all the threshold values may be deemed subject to nuisance/significant impairment, particularly if the observations are supported by public complaints on impact, frequency and duration of odours. |
| | OM1 | 1 | N.N.E | c.D.W. | 1 | 13.00 | 10 | anty any 1 | 2 | Moderate but intermittent in the wind - musty offal / feathers type odour from the lairage area. Balance tanks also detected. |
| | OM2 | 1 | N.N.E | D.W. | 1 | 13.10 is | n pureque | 1 | 1 | Intermittent and barely detectable musty offal / feathers type odour from the lairage. |
| ıtions | OM3 | 0 | N.N.E | c.D.W. | 1 | 13220 | 10 | 2 | 2 | Moderate and persistent offal odour beside offal skip and offal shed. Dissipating quickly as distance increases. |
| Field Observations | OM4 | 0 | N.N.E | c.D.W | Gourse Course | 13.30 | 10 | 1 | 1 | Very intermittent and faint offal type odour. Odours stopped when curtain door closed on offal shed. |
| Field | OM5 | OM5 0 N.N.E D.W. | 2 | 13.40 | 10 | 1 | 1 | Intermittent and faint offal type odour. Odours stopped when curtain door closed on offal shed. | | |
| | OM6 | 0 | N.N.E | D.W. | 2 | 13.50 | 10 | 1 | 1 | Intermittent and faint musty offal / effluent odour from offal room, balance tanks and slight chemical odour from aeration tank. |
| | OM7 | 0 | N.N.E | D.W. | 2 | 14.00 | 10 | 1 | 1 | Intermittent and faint musty offal / effluent odour from balance tanks. |
| Brief de | tails of any meeting with lo | cal resi | dents/com | plaints rece | eived o | during ass | sessmen | t (include na | mes/addresse | s/telephone numbers etc.): |

| that ate | | | | Orientation (Observer V facility) | Strength Note 2 | Start Time (24hr clock) | Period of observation | Odour Persistence (0- 2) Note 4 | Odour Intensity (0-4) Note | conditions etc.) |
|---|---|----|---------------------------|--|---|----------------------------|--------------------------|---------------------------------------|----------------------------------|---|
| Thresholds that could indicate nuisance | | ≥3 | | Down-Wind Approx. DW or not detectable etc. | | | mins | 1 or 2 | ≥2 | Guide- A location where the score meets or exceeds all the threshold values may be deemed subject to nuisance/significant impairment, particularly if the observations are supported by public complaints on impact, frequency and duration of odours. |
| | OM8 | 0 | N.N.E | c.D.W. | 1 | 14.10 | 10 | hty: any 1 | 2 | Intermittent but moderate offal / effluent odour from balance tank. |
| | OM9 | 0 | N.N.E | D.W. | 1 | 14.20 | A PULPOS | 2 | 2 | Persistent and moderate musty offal / effluent odour from balance tanks. |
| Field Observations | OM10 | 0 | N.N.E | c.D.W. | 1 | Lot. 150 | 10 | 2 | 2 | Persistent and moderate chemical fertiliser type odour above aeration tank, due to ferric addition. Not unpleasant. |
| Dbserv | OM11 | 0 | N.N.E | c.D.W | 20158 Conse | ^{nt} 14.40 | 10 | 1 | 1 | Intermittent and Faint spicy cooking type odour. |
| Field (| OM12 | | 0 N.N.E D.W. 2 14.50 10 1 | 1 | 1 Intermittent and Faint spicy cooking typ odour. | | | | | |
| | OM13 | 0 | N.N.E | D.W. | 3 | 15.00 | 10 | 1 | 1 | Intermittent and Faint spicy cooking type odour. Very intermittent as wind varied in strength. |
| | | | | | | | | | | |
| Brief detai | Brief details of any meeting with local residents/complaints received during assessment (include names/addresses/telephone numbers etc.): | | | | | | | | | |

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4.0 **DISCUSSION**

Grove Turkeys Ltd is located on the Mulladuff road, off the N54 approximately 550m from Smithborough. The North and west of the facility contains scattered residential areas with mostly agricultural land with larger residential quantity to the south-east of the facility.

The topography of the area is dominated by drumlins arrayed in an approximately north-east to south-west direction, with ground levels varying from 60m OD to 90m OD. Grove Turkeys Ltd is located adjacent to the Magherarney Lough, in a depression between two drumlins.

The closest odour sensitive residential location to the facility is c. 85 metres to the west of the facility boundary on the local road. Smithborough is located approximately 300m south-east of the facility in an adjacent valley between two drumlins.

Air quality in this region is generally good and reflective of the sub-urban/rural climate in Ireland with odour sources of a minor nature.

As can be seen in the Monaghan Wind Rose Diagram, as per Appendix C, the prevailing winds in this area range from the west to south which have a total percentage occurrence frequency of 49.5% (hourly data). Winds ranging from the south-east have a total percentage occurrence frequency of 4.4%.

Weather conditions during the odour survey were mid (12-14°C), with scattered showers, scattered cloud and light breezes (3-6 knots). Wind direction was somewhat variable during the ten-minute survey periods; however, the dominant wind direction was from the north-east. Due to intermittent rain, the transmission of odours from the site was supressed.

Potential sources of odours within the site were identified and included the Refrigeration room, Kill area, Burger Plant, Spice Store, Offal room, CAT 3 Skip, Sludge Trailer, Screw Press, Effluent Sumps and Effluent Plant Tanks.

As can be seen in the indicative odour plumes provided in appendix A, the majority of odour plumes were confined within the site boundary during the odour assessment.

Odours from the offal shed were detected at the westernmost boundary of the facility. The offal type odours were faint and very intermittent in the variable wind. These odours were no longer detected at the site boundary when the curtain door/screen on the offal shed was closed.

Odours from the facility were not detected at odour sensitive locations as the wind direction carried odours to the south-west of the facility, in the direction of the Magherarney Lake/River. Those odours which were noted at the site boundary were intermittent and faint, and therefore would be below the threshold that would be likely to cause a nuisance, as defined by the EPA AG5 Guidance

As a result of this odour assessment, it is concluded that the odour emissions from the Grove Turkeys facility were not found to be contributing odours which would significantly impact upon amenity at odour sensitive locations.

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5.0 CONCLUSIONS

- The monitored odour emissions from the Grove Turkeys facility were not found to be • contributing odour levels which would significantly impact upon amenity at odour sensitive locations.
- Following on from this odour assessment, review of site documentation and discussions • with staff, it is considered that the following aspects are key to the on-going management of odours from the site:
 - Offal Room and Skip 0
 - Effluent Plant Tanks 0
- These aspects have been used in the preparation of an Odour Management Programme, • as per Appendix B of this document.

6.0 **RECOMENDATIONS**

From the results of this odour assessment report, the following is recommended;

• Carry out weekly odour patrol checks and keep a log of all findings, including weather conditions and wind direction.

WWTP

- Ensure the sludge trailer is covered at all times and removed off-site weekly.
- Calibrate dissolved oxygen proper in the aeration tank on an annual basis.
- \circ Maintain dissolved oxygen version in aeration tanks at >1 mg/l during the aeration Conser process.

Blood and Offal Building

- Maintain a "closed door" policy at the offal building as practical i.e. curtain door.
- Remove offal and CAT3 skips daily

These recommendations have been included in the draft Odour Management Plan provided in Appendix B.

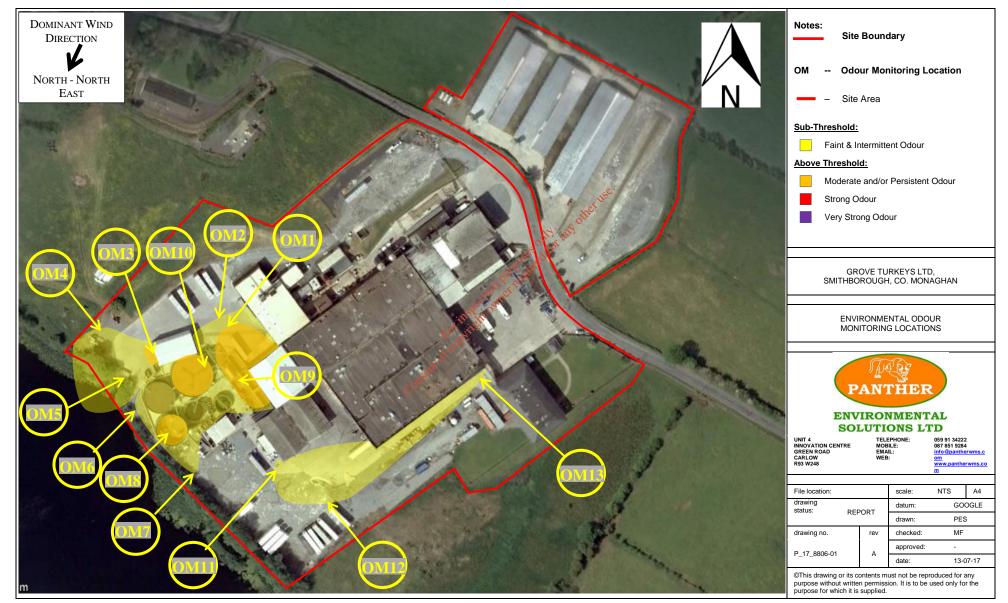
APPENDIX A

- SITE MAP WITH MONITORING POINTS -

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Figure A.1: Odour Survey Map





B.1 ODOUR MANAGEMENT

B.1.1 GENERAL PRINCIPALS OF ODOUR MANAGEMENT IN THE FOOD PROCESSING SECTOR

A statutory odour nuisance is something which is so offensive and prolonged that it significantly interferes with the enjoyment and use of the affected property.

Many things can affect whether an odour would be considered a statutory nuisance: time of day the odour occurs; how long it is a problem for; the type of smell and its effects: the character of the area.

For example, in the countryside it is reasonable to expect odour from farming activities.

Due to the complex nature of odour perception by the human olfactory system, levels of sensitivity to odour within a population will vary. Consequently, the perceived offensiveness of an odour will vary from person to person. In addition, the context in which the odour occurs will affect the nuisance value of an odour.

As odour accounts for a significant proportion of the complaints that local councils and the Environment Agency receive about environmental pollution, it is important that management are cognisant of odour issues in design and management of a Wight owner required f facility. inspection purpt

B.1.2 BACKGROUND TO TURKEY PROCESSING AND WWTP ODOURS

Documented Odour Management

A written odour policy/ management programme can be helpful in maintaining standards and demonstrating a commitment to good odour management. Such a programme can also be an important tool in staff training.

All staff should be trained on the content of the programme to ensure a commitment to good odour management. A record may be kept of the date and name of person trained and made available for inspection by the licensing authority or environmental health responsible authority.

Methods for monitoring odour should be included in an odour policy i.e. perimeter checks and sniff testing by the staff.

A log book may be kept of any odour monitoring carried out, the findings and any remedial action taken. The log should indicate whether it was routine odour monitoring or the result of a complaint.

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Odours from Turkey processing arise mainly from the following sources:

- Live Turkey intake area.
- Scalding and plucking process.
- Offal processing, sorting and storage.
- Blood Storage.
- Coarse screening for feathers etc.
- Storage of blood and offal for transport off-site.
- Effluent Plant treatment processes.
- Cooking processes.
- Transport of offal/blood and effluent sludge for transport off-site.

In certain facilities drainage and bad housekeeping can be a significant source of odours. Spillages and drain liquid from offal storage containers and offal handling can contaminate significant surface areas. The build-up of organic matter on rough concrete surfaces can lead to significant emissions especially during warmer summer months. Great care should be taken to ensure the elimination of unscheduled emissions such as these through good housekeeping and management.

Odours from WWTP operations arise mainly from the volatilisation of odorous gases from:

- Aeration tanks where insufficient oxygen is being provided.
- The surfaces of non-quiescence processes including overflow weirs, returned pumped centrate/liquor above the working height of the tank/channel etc.
- Anaerobic decay of settles/floating organic debris upon quiescence surfaces including organic matter attached to grit, rags and feathers, organic matter carryover to secondary tanks, etc.
- Screens operation and build-up of organic debris within screens area.
- DAF operation and fat storage/handling.
- Sludge handling operations including dewatering, thickening, storage and transport of raw/processed sludge's offsite and desludging.
- Turbulent processes within the inlet works, storage of screens (i.e. grit and feathers removal) and DAF process and fat/skim storage.
- Inefficient odour control/abatement equipment operation and design including loose fittings covers, inefficient extraction and odour control unit failure.

Fugitive emissions are generally associated with:

- Urine and manure (ammonia) odour from the abattoir lairage areas.
- Blood storage tanks.
- Yard areas used to store skips for gut contents, inedible offal, SRM waste and other animal by-products.
- Effluent treatment plant.
- Sludge and bio-solids removed from the effluent treatment plant.

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B1.2 COMPLAINTS PROCEDURE

A procedure should be established for verifying and responding to complaints about odours. The existence of a complaints procedure can help to:

- Improve relationships with neighbours;
- Identify sources of odours and prevent future problems.

Prompt action in response to complaints, including a discussion with an explanation to the complainant, is very important and may stop issues escalating and further complaints being made. It should be remembered that when people are disturbed, for example, by something that they believe to be avoidable (whether it is or not) they may be short-tempered. A quick and sympathetic response to complaints can often defuse a situation to the benefit of the complainant and the operator.

A contact telephone number should be made available to local residents which they can use to report odour disturbances to a 'responsible person' at the premises as and when they occur.

A suggested content for recording complaint details is given below (See Table B.3 for recommended format).

The complaints record form should be tailored to the specific business, location and neighbours, but most will have the following elements:

- 1) The form should be completed, signed and dated by a 'responsible person'.
- 2) A name, address and telephone number should be given by the caller.
- 3) Each complaint should be given a reference number.

4) The caller should be asked to give details of:

- The time the odour found;
- How long it lasted;
- How often it occurs;
- The nature of the odour what sort of odour was it? What did it smell like?

5) The 'responsible person' should then, if possible, make a note of:

- The weather conditions at the time the odour was detected usually wind direction and a note of the conditions (light wind, no wind, strong breeze, or use the Beaufort scale); and
- The activity on the premises at the time the odour was detected, particularly anything unusual.

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| Force | Description/ | Observation | Wind-speed (km/hr) |
|-------|-----------------|---|-----------------------|
| 0 | Calm | Smoke rises vertically | 0 |
| 1 | Light Air | Direction of wind shown by smoke drift, but not wind vane | 1-5 |
| 2 | Light Breeze | Wind felt on face; leaves rustle, ordinary vane moved by wind | 6-11 |
| 3 | Gentle Breeze | Leaves and small twigs in constant motion | 12-19 |
| 4 | Moderate Breeze | Raises dust and loose paper; small branches are moved | 20-29 |
| 5 | Fresh Breeze | Small trees in leaf begin to sway, small branches are moved | 30-39 |
| 6 | Strong Breeze | Large branches in motion; umbrellas used with difficulty | 40-50 |
| 7 | Near Gale | Whole trees in motion; pressure felt when walking against wind | 51-61 |

Table B.1:Beaufort Scale

6) The reason for the complaint should be investigated and a note of the findings added to a log – this need not be complicated but should be sufficient to identify any activity that may have led to the complaint?

7) The caller should then be contacted with an explanation. It often helps if you can show that you have taken some kind of action to minimize the odour in future.

Following complaints, it may be appropriate to review the Odour Management Plan.

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B.2 ODOUR MANAGEMENT PROGRAMME

The Odour Management Programme (OMP) is a core document that is intended to detail operational and control measures appropriate to the management and control of odour at the site. The format of the OMP should provide sufficient detail to allow operators and maintenance staff to clearly understand the operational procedures for both normal and abnormal conditions.

An Odour Management Programme (OMP) should be prepared for all processes. The OMP should also include sufficient feedback data to allow site management (and local authority inspectors) to audit site operations. An example of some of the issues to be considered is summarised as follows. More detailed guidance is provided with this document.

- A summary of the site, odour sources and the location of receptors. •
- Details of the site management responsibilities and procedures for reporting faults, identifying maintenance needs and complaints procedure.
- Odour critical plant operation and management procedures (e.g. correct use of plant, process, materials, checks on plant performance, maintenance and inspection).
- Operative training.
- Housekeeping.
- Maintenance and inspection of plant (both routine and emergency response).
- Spillage management procedures.
- Record keeping format, responsibility for completion and location of records.
- Emergency breakdown ward incident response planning including responsibilities and mechanisms for liaison with the local authority.

The Odour Management Programme is a living document and should be reviewed annually.

It should form the basis of a documented Environmental and Odour Management system for the operating site. The Odour Management System documentation should define the roles of the key staff and management and set out templates in relation to the operating of the facility and reporting procedures to be employed.

Requirements for the Odour Management Programme should be implemented throughout the site with a branched management system implemented in order to share responsibility around the site. The Environmental Manager should ensure all works are performed in accordance with the OMP.

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Table B.2. Odour Management Action Plan (Draft)

| | AREA SOURCE | ODOUR SOURCE | ACTION PLAN | IMPLEMENTATION / COMPLETION DATE |
|-----|----------------|---------------------|--|-------------------------------------|
| 1.a | | | All relevant staff to be trained on OMP measures. | On-going |
| 1.b | | | Review and update OMP annually, or following any relevant changes at the site. Key Performance Indicators (KPI's): - Number of Complaints, - Number of abnormal odour events (odour patrol checks), - Results/recommendations of any surveys | On-going |
| 1.c | | | Provide contact details of relevant members of staff for the receipt of environmental complaints to neighbours. | Immediate |
| 1.d | | | Inform neighbours or local council of any abnormal planned operations/projects which may lead to significantly increased odours. Provide detail of timing and likely duration to minimise odour annoyance. | As appropriate |
| 1.e | | | Carry out weekly odour patrol boundary checks and keep log of all findings, including weather conditions and wind direction. EPA "Odour Impact Assessment Guidance for EPA Licensed Sites (AG5)" | Weekly |

| | AREA SOURCE | ODOUR SOURCE | ACTION PLAN | IMPLEMENTATION / COMPLETION DATE |
|----|----------------|---------------------|--|-------------------------------------|
| 2. | Site-wide | Fouling of yards | Ensure external areas are kept clear of pre-stabilised biosolids, including surfaces and yards. Clean up any spillages as they occur. Remove as much spilled material as is possible through dry methods (shovel/sweeping) prior to washing down the area. Collected material should be stored in a sealed container within the main building. Spills of stabilised biosolids should be shandled as above, however, these can be stored with stabilised sludge stockpiles. | On-going |
| 3. | Main Facility | Open Doors | Maintain a closed-door policy in all areas containing potentially odorous materials, particularly during warm weather. | On-going |
| 4. | Spice Store | Spices Storage | Clean any spillages immediately. | As necessary |
| 5. | Refrigeration | Ammonia Leaks | Check for ammonia leaks as part of environmental checklist. Carry out preventative maintenance on ammonia system and leak detection system as recommended by suppliers. | Weekly As required |

| | AREA SOURCE | ODOUR SOURCE | ACTION PLAN | IMPLEMENTATION / COMPLETION DATE |
|-----|---|-------------------------------|--|---|
| 6. | Lairage | Feather / Offal | Ensure equipment and conveyors are maintained to ensure high efficiency. Clean equipment and conveyors regularly to prevent solids build up. | On-going As necessary |
| 7. | Organics / organic waste containers | Offal / CAT3 Waste Storage | Putrescible materials to be collected and removed offsite every two days, particularly during warm weather conditions. Ensure all putrescible waste containers can be sealed / covered while not in use. Inform waste collectors of requirement for sealed / covered containers. Inspect all containers onsite as part of weakly environmental odour patrol check. Clean containers if necessary. | Two days On-going On-going Weekly As required |
| 8. | WWTP | Plant and equipment | Maintain equipment, including preventative maintenance schedule, to ensure high efficiency. | On-going |
| 9. | WWTP | Plant and equipment | Ensure that back-up critical equipment is available onsite (e.g. back-up aerators etc.) | On-going |
| 10. | WWTP | Drains | Ensure all drains are flushed regularly and prevent persistent build-up of organic matter in drains by design. | On-going |

| | Area Source | Odour Source | ACTION PLAN | IMPLEMENTATION / COMPLETION DATE |
|-----|----------------|----------------|--|--|
| 11. | WWTP | Effluent Sumps | Minimise residence time for effluent in the raw sumps as practical | On-going |
| 12. | WWTP | Inlet Screens | Power wash inlet screens and area with hot water to prevent solids build-up monthly. | Monthly |
| 13. | WWTP | DAF Unit | Empty and clean DAF unit with hot water monthly. Monitor chemical addition to ensure on going treatment efficiency. | Monthly On-going |
| 14. | WWTP | Balancing Tank | Maintain at 50% levels. Junt to the second | On-going. On-going Annually Daily |
| 15. | WWTP | Aeration Tank | Maintain dissolved oxygen levels at > 1 mg/l. Calibrate DO probe annually Operator trained to check DO daily. | On-going Annually Daily |

| | AREA SOURCE | ODOUR SOURCE | ACTION PLAN | IMPLEMENTATION / COMPLETION DATE |
|-----|-------------------|------------------------|--|---|
| 16. | WWTP | Sludge Holding Tank | Remove sludge from tank at minimum every two days (residence time). While sludge is stored in the tank, operate the mixer continuously. Avoid exposure of stored sludge to air during removal. | Every two days As required On-going |
| 17. | Sludge Trailer | Sludge in transport | Ensure all trailers and skips used to transport sludges off-site are sealed and adequately covered to prevent any potentiat odours in transit. | On-going |
| | | | Consent of copyright owner required to | |

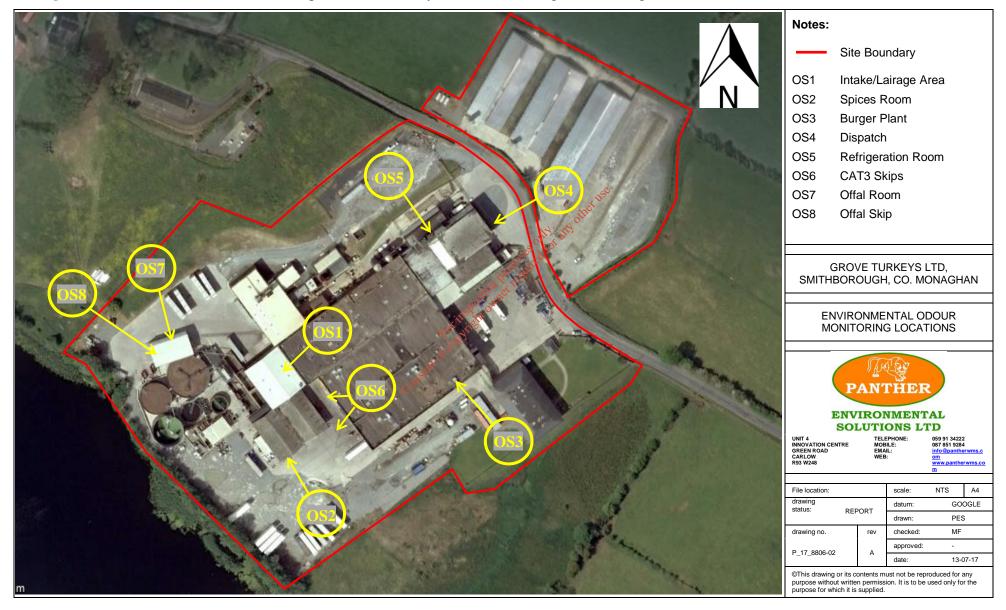
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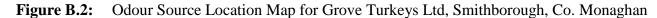
Table B.3: Register of Potential Odour Sources

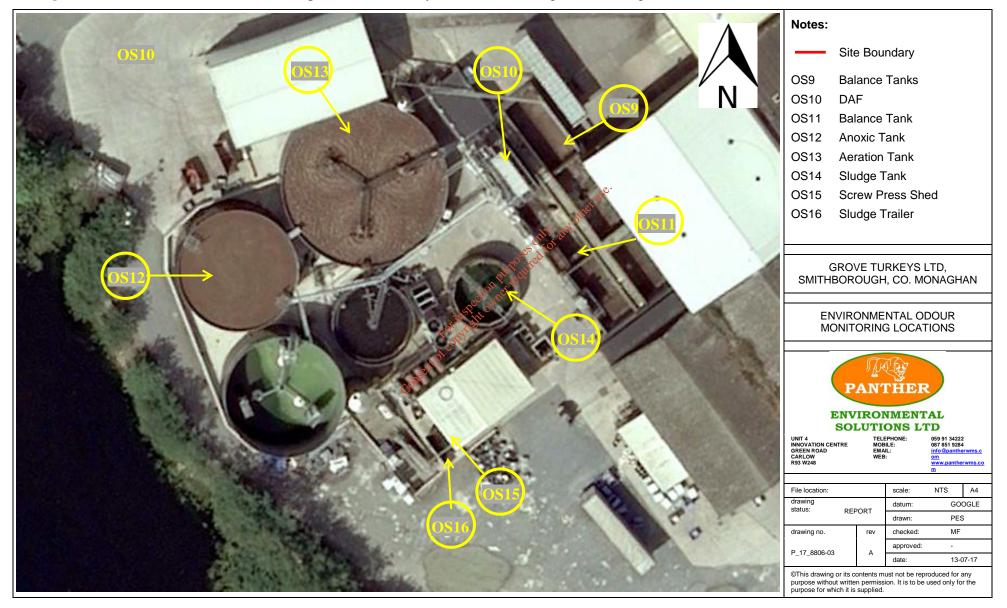
| | (| Observer Location | | Time | | ating | Odour Description Comments |
|---|-----------|--|-------|--------------------------|---|---------------------------------------|---|
| Parameter | (describe | Name of household / commercial site (describe so that location can be easily identified again by a third party) | | Period of observation | Odour Persistence (0-2) Note 4 | Odour Intensity (0-4) Note 5 | Description of any odours, other source(s) of odours etc. (Also note variable weather conditions etc.) |
| Thresholds that could indicate nuisance | | | | mins | 1 or 2 | ≥2 | Guide- A location where the score meets or exceeds all the threshold values may be deemed subject to nuisance/significant inpairment, particularly if the observations are supported by public complaints on impact, frequency and duration of odours. |
| Field Observations | OS1 | Intake/Lairage Area | 13.00 | 5 | 2 purp | pined 10 | Strong and persistent feather / offal type odour within lairage building. |
| | OS2 | Spice Store | 14.35 | 5 | inspection owner. | 1 | Persistent but faint spices odour within room. |
| | OS3 | Burger Plant | 14.55 | 5 F | opyties | 1 | Intermittent cooking / spicy odour from production area chimney. |
| | OS4 | Dispatch | 12:50 | Catsento | 0 | 0 | No odours, risk of odours from spills. |
| | OS5 | Refrigeration Room | 12.55 | 5 | 2 | 2 | Ammonia odour – only within building. |
| | OS6 | Cat 3 Skip | 14.45 | 5 | 0 | 0 | No odour during assessment. |
| | OS7 | Offal Room | 13.20 | 5 | 2 | 3 | Strong persistent offal/blood odour within building. |
| | OS8 | Offal Skip | 13.25 | 5 | 2 | 1 | Faint but persistent offal type odour. |
| | OS9 | Effluent Sumps | 14.05 | 5 | 0 | 0 | No odour during assessment. |

| | | Observer Location | | Time | | ating | Odour Description Comments |
|---|--|--------------------------|----------------------------|--------------------------|---|---------------------------------------|---|
| Parameter | Name of household / commercial site (describe so that location can be easily identified again by a third party) | | Start Time (24hr clock) | Period of observation | Odour Persistence (0-2) Note 4 | Odour Intensity (0-4) Note 5 | Description of any odours, other source(s) of odours etc. (Also note variable weather conditions etc.) |
| Thresholds that could indicate nuisance | | | hh:mm | mins | 1 or 2 | ≥2 | Guide- A location where the score meets or exceeds all the threshold values may be deemed subject to nuisance/significant impairment, particularly if the observations are supported by public complaints on impact, frequency and duration of odours. |
| | OS10 | Balance Tanks | 14.16 | 5 | 2 | es only any | Persistent, moderate to strong musty offal / effluent odour. |
| Field Observations | OS11 | DAF Tank | 14.19 | 5 | 0 purp | quines 0 | No odour during assessment, dominated by balance tanks. |
| | OS12 | Balance Tank | 14:10 | 5 | TINSPECTOWING | 2 | Persistent, moderate to strong musty offal / effluent odour. |
| | OS13 | Anoxic Tank | 14:13 | 5 of | 0 62, | 0 | No odour during assessment. |
| | OS14 | Aeration Tank | 14.22 | Const. | 2 | 1 | Chemical fertiliser type odour due to ferric addition. Not unpleasant. |
| | OS15 | Sludge Tank | 14:25 | 5 | 0 | 0 | No odour during assessment. |
| | OS16 | Screw Press Shed | 14:28 | 5 | 0 | 0 | No odour during assessment. |
| | OS17 | Sludge Trailer | 14.31 | 5 | 0 | 0 | No odour during assessment. |

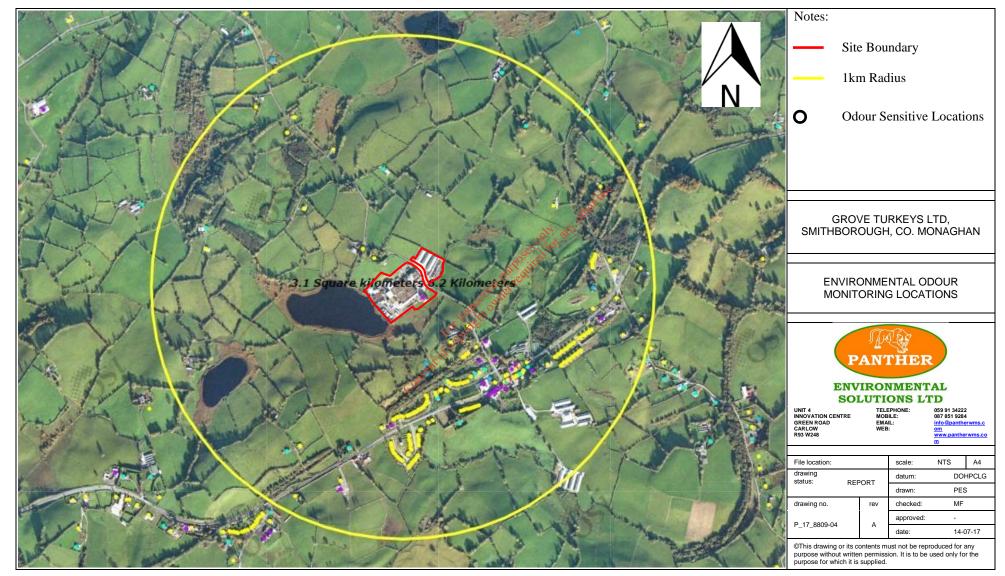












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 Table B4 – Odour Complaints Form

| ODOUR COMPLAINTS FORM | | | | | | | | |
|--|-------------|--|-------------------|--|--|--|--|--|
| Complaint Reference No: | | | | | | | | |
| Responsible Person | | | | | | | | |
| Name: | | | Position: | | | | | |
| Signed: | | | Date: | | | | | |
| | COMPLAINANT | | | | | | | |
| Name: | Name: | | | | | | | |
| Address: | | | | | | | | |
| Contact Number: | | | | | | | | |
| | | DETAILS (| OF ODOUR | | | | | |
| At what time was the odour detected? | | | | | | | | |
| How long d | | | | | | | | |
| odour last? How often d | loog the | | - 1 ⁹⁹ | | | | | |
| odour occui | | in sother | | | | | | |
| What was th nature of th odour? | - | For inspection perposes on the new offer and other new offer and the new offer and t | | | | | | |
| | | WEATHER (| CONDITIONS | | | | | |
| (Wind – Beaufort Scale, Precipitation – Fog/Drizzle/Showers/Heavy, etc.) | | | | | | | | |
| | | COMPLAINT IN | NVESTIGATION | | | | | |
| Odours detectable from Premises? | | | | | | | | |
| Do any correspond to odour described by complainant? | | | | | | | | |
| Mitigation actions planned/taken? | | | | | | | | |
| Result of Follow-Up Correspondence with Complainant | | | | | | | | |
| | | | | | | | | |

APPENDEX C - Monaghan Wind Rose Diagram -

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ODOUR IMPACT ASSESSMENT 2017 GROVE TURKEYS LTD

The wind-rose diagram is divided into 16 cardinal directions; north (N), NNE, etc.

The length of each sector indicates the wind direction frequency for each cardinal direction.

The colour coded lines subdivide the overall frequency of wind into the proportions at a given wind speed (in km/h) in each cardinal direction. Each wind-speed frequency is additive upon the previous wind-speed frequency percentage.

