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Cambrian Pet Foods Ltd

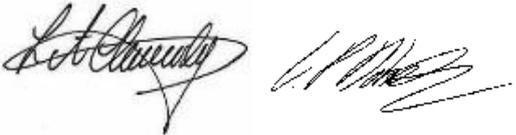
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CAMBRIAN PET FOODS LIMITED, TWYI VALLEY FOOD PARK, STATION ROAD, LLANGADOG NOISE & ODOUR MANAGEMENT PLAN

**CAMBRIAN PET FOODS LIMITED, TWYI VALLEY FOOD
PARK, STATION ROAD, LLANGADOG
NOISE & ODOUR MANAGEMENT PLAN**

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APPENDICES

Appendix 1

Noise & Odour Monitoring Points

1. INTRODUCTION

1.1 Purpose and Scope

This Noise & Odour Management Plan (N&OMP) provides information on the measures implemented to control noise and odour emissions from the wet pet food production facility operated by Cambrian Pet Foods Limited (Cambrian) at Tywi Valley Food Park, Station Road, Llangadog, Carmarthenshire, SA19 9LY, Wales.

The N&OMP is consistent with the Environment Agency's H3 Horizontal Guidance for Noise Part 2 – Noise Assessment and Control, Natural Resources Wales' H4 Odour Management general guidance, covering Welsh regulatory requirements with regard to odour, and with DEFRA's Process Guidance Note (6/24(13))- Statutory guidance for pet food manufacturing.

This N&OMP outlines the sources of noise and odour at the facility and the methods implemented to control noise and offensive odour.

Following the H4 guidance, this is structured as follows:

Section 2 – A description of the site and process;

Section 3 – Assessing the level of noise and odour pollution and appropriate measures;

Section 4 – Control measures; and

Section 5 – Monitoring.

2. DESCRIPTION OF THE SITE AND PROCESSES

2.1 Site Overview

The Facility is located at Tywi Valley Food Park in Llangadog, Carmarthenshire; approximately 36 km north of Swansea City Centre. The area is predominantly of agricultural land use. The A4069 (Station Road) borders the site to the north, Llangadog train station lies adjacent to the site to the east, whilst land to the south and west is agricultural, with the Afon Bran to the south flowing to the Afon Tywi to the east. Production at the Facility occurs between, 0700-1900, five days per week. Cleaners can be on site outside of production hours.

2.2 Regulatory Inspections

The Facility was visited by environmental health inspectors from Carmarthenshire County Council, in relation to their Part B Permit, on 23rd March 2018. The performance of Cambrian in relation to odour was assessed, and it was determined that the Facility was a low risk category, with the next visit planned for 2020.

2.3 Overview of Process

Raw materials arrive at site by road. Meat and fish is received either fresh (chilled) or frozen. Frozen meat and fish is either sent directly to the cold store freezer or moved directly into the main manufacturing building for processing. Where the fresh meat cannot be used immediately, it is frozen using eight ammonia chilled freezing plates and moved to the cold store freezer. Dry ingredients (rice, cereals, powdered vitamins and minerals) and packaging are received and checked prior to acceptance and are held in the dry warehouse until required.

Meat and fish ingredients are batched as per the recipe. The meat and fish ingredients are broken down in a breaker before being minced and mixed with the other ingredients. Once mixed the ingredients are either used directly in the loaf and tray product, or extruded into a paste for making the chunks for the chunk product. In the latter scenario the paste is pre-cooked in a steam tunnel, cooled using water and cut into chunks. The chunks are then added to cans along with the gravy or jelly, which has been produced by mixing ingredients with hot water. For the loaf product the mixed ingredients are added directly to the can. An end is then seamed onto the loaf and chunk cans and cooked in one of the automated autoclaves / retort used for the cans. When the cooking process is completed, the retort introduces cooling water to cool the cans prior to discharge.

Trays are produced on a separate line, using the mixed ingredients to fill the tray. A film covering is placed over the tray and sealed. The trays are loaded into autoclaves / retorts used for cooking the tray product.

Cans and trays are automatically removed from the metal baskets and are conveyed to the warehouse for packaging. Cans are labelled and packaged in a cardboard tray and film, or cardboard box. Trays are usually provided with a cardboard sleeve before being boxed. Cans and trays are then stacked on pallets, shrink wrapped and labeled. The finished product is stored in the on-site warehouse before dispatch.

There are also office, canteen and laboratory facilities and an Effluent Treatment Plant (ETP) that are separate from the production areas.

2.4 Neighbouring Communities, other Noise and Odour Sources and Sensitive Receptors

The site is located approximately 0.7 km west of the village of Llangadog with largely agricultural surroundings. The A4069 (Station Road) runs adjacent to the north of the site, and Llangadog railway station and the railway line border the site from the north-east to the south. Beyond the

road and railway line to the north-east and east are residential and commercial units, including a public house, farm buildings, a small-scale recycling and waste centre and a country store.

The industrial units in the immediate vicinity of the site do not represent a potential additional source of odour. The nearby farm buildings do not appear to house livestock.

The nearest residential receptors to the site are approximately 18 m to the north-east.

Potential receptors which are representative of the land use in the surrounding area have been shown in Table 2.1.

Table 2.1: Location of Potentially Sensitive Receptors

Receptor	Receptor Type	Approx. distance from site boundary (and direction)
Residential	Residential	18 m (NW)
Public House	Commercial	100 m (E)
Country Store	Commercial	190 m (E)

2.5 Noise Sources

2.5.1 Generation of Noise at the Factory

There is the potential for noise to arise through the transport and receipt of raw materials and through the collection of finished products and wastes by heavy goods vehicles. Forklift trucks are also used to transport goods on-site.

Production processes including the compressor, boiler and steam are also potential sources of noise on the site.

2.5.2 Noise Source Inventory

Table 2.2 contains the noise source inventory for the factory. It provides a summary of the main sources of noise, their locations and the activities involved. pattern of release and method of control.

Table 2.2: Noise source inventory

Source ID	Source	Location	Activity involved	Means of control
N1	Heavy Goods Vehicles	Site access road	Raw materials delivery and product collection	All deliveries and collections are planned to occur between the hours of 0630 and 1800.
N2	Forklift trucks	External areas of site/ warehouse	Transporting stock on site	Forklift Trucks are maintained in accordance with manufacturers specifications.
N3	Compressor	Compressor House	Compressed air	Regular maintenance

Source ID	Source	Location	Activity involved	Means of control
				Within enclosed building
N4	<i>Ammonia Plant</i>	Ammonia Plant room	Chilling	Regular maintenance Within enclosed building
N5	<i>Boiler</i>	Boiler House	Steam generation	Regular maintenance Within enclosed building
N6	<i>Steam</i>	Manufacturing	Cooking	Regular maintenance Within enclosed building

2.6 Odour Sources

2.6.1 Generation of Odours at the Factory

There is the potential for odours to arise through the receipt, handling and storage of raw materials, the mixing and batching process carried out during the production process, and through the canning and cooking phase of the process. Odorous compounds then build up in the air within the building.

Wastes are stored on site and are collected regularly by licensed waste carriers, including spoiled meat and fish waste. General waste and recyclable wastes are stored in the on-site waste compound, whilst 'floor' waste is frozen and stored in the cold store.

The effluent treatment plant (ETP) is also a potential source of odours, particularly during collection of sludge, and the venting of tankers. The ammonia plant has the potential in abnormal and emergency situations to cause odour.

2.6.2 Odour Source Inventory

Table 2.3 contains the odour source emissions inventory for the factory. It provides a summary of the main sources of emission, their locations and the materials/activities involved, and the characteristics of the source (e.g. fugitive or controlled, point, area or volume, release height, likely odorous compounds, quantities likely to be released, pattern of release and method of control).

It is important to note that although there are many potential sources of odour, almost all sources of odour identified for the Facility are contained within the main building and internal courtyard areas.

Table 2.3: Odour source emissions inventory

Source ID	Source	Location	Activity & materials involved	Type of emissions	Means of control
O1	Raw materials delivery	Site access road	Incoming loads of raw materials	Fugitive	Meats are transported and held at low temperature (chilled and frozen) and are transferred directly into the manufacturing building or cold store.
O2	Raw material reception and storage	Cold store / manufacturing area	Transfer of meats	Fugitive	Raw materials held indoors, in chilled or frozen state
O3	Freezing of chilled material	Plate freeze room	Freezing	Fugitive	Raw materials held indoors, in chilled or frozen state
O4	Manufacturing process-batching	Ingredient mixing process	Mixing of ingredients	Fugitive	Takes place internally. Raw materials are chilled and frozen.
O5	Manufacturing process-cooking	Main production area	Cooking in steam tunnel, and autoclaves	Fugitive	The main products are cooked in their packaging, thus avoiding odorous emissions. The exception is chunk cooking, which is cooked in a steam tunnel within an enclosed building.
O6	Boiler operation	Chimney	Steam production	Point source. From stack.	Uses gas. Regular maintenance
O7	General waste and cardboard	Waste storage area- Roll on, Roll off. 35 yd	General waste and packaging e.g. from offices	Fugitive	No process (meat and fish) waste. Mainly dry waste. Regularly collected
O8	Meat and fish waste	Cold store freezer	'Floor' waste	Fugitive	Waste is frozen and collected frozen
O9	Effluent treatment	Effluent treatment plant	Effluent treatment	Fugitive	Regularly maintained.
O10	Collection of sludge from effluent treatment plant	Effluent treatment plant	Collection of sludge	Fugitive	Located 200m from nearest receptor and stored in an enclosed silo.
O11	Ammonia	Ammonia plant	Freezing	Fugitive	Regular maintenance of ammonia plant. Leak detection. Emergency response procedures.

3. ODOUR CONTROL DURING NORMAL OPERATION

This section of the N&OMP describes the means by which Cambrian will control odour impacts from normal operations. A full description of the odour controls has been given for each stage of the process, as identified in Table 2.3.

Measures can be taken to minimise the quantities of odorous chemicals formed on site or to minimise their release by good working practices and process control; whereas it is much more difficult to improve atmospheric dispersion. Therefore, the factory works in accordance with the accepted hierarchy of preferred controls, that is:

- prevent formation/release of odour in the first place;
- where this is not practicable, minimise the release of odour;
- abate excessive emissions; then
- dilute any residual odour by effective dispersion in the atmosphere.

3.1 Working Practices to Minimise Odour Releases

Source O1/ O2/ O3- Deliveries, storage and processing of raw materials

Incoming raw materials are delivered either fresh (chilled) or frozen, in temperature controlled vehicles, and is checked for quality prior to acceptance. Frozen meat and fish is either sent directly to the cold store freezer or moved directly into the main manufacturing building for processing. Fresh meat is either stored in the cold store chiller for immediate use or frozen using ammonia chilled freezing plates, with the resultant blocks being moved to the cold store freezer. Any processing of raw materials upon delivery is carried out within the manufacturing building, containing any potential odours. Dry ingredients (rice, cereals, powdered vitamins and minerals) are delivered in sealed packaging and are held in the dry warehouse until required.

The goods reception areas are kept clean at all times and are included in cleaning schedules.

Source O4- Batching of ingredients

Mixing of raw materials is undertaken in the manufacturing building. Any odours arising from the batching process are retained within the building, with doors kept closed at all times to prevent the escape of fugitive odorous emissions.

Source O5- Cooking

The main cooking on site involves canned or sealed trays being cooked in an autoclave / retort. Sealed cans and trays assist with odour prevention during cooking. The exception is the partial cooking of the chunk product in a steam tunnel. This process is carried out internally, and doors of the manufacturing building are kept closed to prevent the escape of fugitive odorous emissions.

Source O6- Boiler operation

Operation of the gas boiler produces steam for cooking. Use of gas reduces the potential for dark and smoky emissions. Emissions from the boiler are released via a high-level chimney. The boiler is maintained under a maintenance contract.

Source O7- Storage and disposal of general and recyclable waste

General wastes, cardboard and 'clean' plastics for recycling are stored in a designated waste area in 35 yard roll on-roll off skips. These are mainly dry wastes and do not include any process (meat or fish) wastes. General wastes are collected weekly and cardboard and plastics are collected on a regular basis, as required.

Source O8- Storage and disposal of 'floor' (meat and fish) waste

Any waste meat and fish materials are frozen and stored in the cold store, in a dedicated and designated quarantine area, prior to collection to prevent odour from arising.

Source O9- Treatment of effluent

Effluent from the production process is treated at the on-site effluent treatment plant (ETP). The ETP is regularly maintained and is monitored daily by Maintenance Department and by the on-site laboratory to ensure efficient treatment of wastewater.

Source 10- Collection of sludge from the effluent treatment plant

Sludge is stored in an enclosed silo until it is collected from the ETP by licensed tankers as required. The ETP is located approximately 200 m from the nearest receptor and is therefore not considered to present a significant risk of nuisance odours.

Source 11- Ammonia

Ammonia plant is used for freezing raw materials on-site. The ammonia plant is subject to regular maintenance and leak checks. In the event of an ammonia leak, Cambrian has an Emergency Response Procedure in place.

4. ROUTINE MAINTENANCE AND INSPECTION

4.1 General

Planned maintenance and inspection is crucial to maintaining the effectiveness of noise and odour control measures. An effective, planned preventative maintenance (PPM) regime is in place on all plant and equipment.

Maintenance requirements are determined by the Operations Manager and are based on Cambrian's experience of the machines and the service schedule recommended by the manufacturer. These PPM requirements are recorded on the maintenance schedule, which indicates what will be maintained and when.

4.2 Building Containment

It is essential that the integrity of the facility building fabric is maintained continuously, other than during periods of essential maintenance. The effective operation of opening/closing of doors will be checked routinely.

5. ODOUR CONTROL DURING MAINTENANCE AND ABNORMAL EVENTS

This section of the N&OMP deals with the management and control of noise and odours during maintenance and emergency periods and is an important part of the Noise and Odour Management Plan. This section describes how Cambrian will operate an action plan for abnormal event scenarios (including emergencies, maintenance, breakdowns, weather anomalies, etc).

This is a summary of the foreseeable situations that may compromise the operator's ability to prevent and/or minimise noise and odorous releases from the process and the actions to be taken to minimise the impact. The action plan is intended to be used by operational staff on a day-to-day basis.

In the following pages, a tabular risk assessment has been compiled. This table:

- identifies the conditions under which abnormal operational conditions or failures might arise;
- describes what these are;
- summarises the potential impacts from the identified abnormal/failure situations and assesses the degree of those impacts; and
- describes how these conditions could be prevented and/or mitigated and controlled.

Solutions to mechanical problems will necessitate the replacement or repair of the broken down machine. With regards to essential items of equipment a list of spares required and the procedure for re-ordering will be kept on site and will be based on the manufacturers' recommendations of spares required together with standby equipment for some critical items. Breakdowns should be minimal with the N&OMP implemented, as maintenance of noise and odour critical plant will minimise these occurrences.

Where routine, planned and emergency maintenance of plant items has to be carried out and there is a likelihood of noise or odour being released to atmosphere in quantities sufficient to result in detection off-site, a detailed risk assessment of the activity would be conducted, as part of which issues of odour generation, release and control would be considered.

Where the risk of an off-site noise disturbance or odour event occurring is judged to be medium or high, Carmarthenshire County Council will be notified immediately to advise of a potential problem leading to possible public complaints.

Any incident likely to increase the risk of noise or odorous emissions off site will be escalated to the competent person responsible for the facility immediately. That person will take appropriate action and also notify Senior Management and the internal Technical Manager so that mitigating actions can be put into place as soon as possible.

Mitigating actions may include engineer call out or replacement of equipment using critical spares. Specific actions have been detailed below.

Table 6.1: Odour risk assessment

Identify the release point(s) and areas	Identify possible abnormal operation or failure that would lead to an odour event	What are the consequences of such an abnormal situation or failure	What measures should be in place to prevent or reduce the abnormal situation or failure	What actions should be taken and who will be responsible
Access road and outside factory	Accident involving delivery vehicle causing major spillage of raw materials	Uncontrolled release of odours from open area source- potential to lead to odour annoyance at sensitive receptors.	Response plan to deal with accidents.	Competent Person to initiate accident response plan – delivery vehicle made safe. If drivable, remaining material to be delivered into reception area or vehicle removed off site. Spilt materials and debris immediately collected and transferred into reception area. Spill area then cleaned and hosed down.
Cold store	Failure of the cold store refrigeration units due to power failure or mechanical failure.	Potential for fugitive odorous emissions, leading to odour annoyance at sensitive receptors.	Odour Response Procedure	Failure of a single unit would cause no problems- in event of total failure, insulation and temperature of deliveries allows 48 hours to resolve problem. If failure could not be resolved, refrigerator trailers would be hired to provide temporary storage and supply chain would be managed to limit stock levels.
Building doors	Doors malfunction and remain open	Potential for fugitive odorous emissions from open doors- may cause odour to be detected at nearby sensitive receptors.	Doors will be able to be operated by remote control or manually. A routine maintenance plan and schedule will be incorporated into any existing maintenance programme.	Competent person to ensure doors are repaired as quickly as possible. Until repairs are completed, competent person to ensure doors remain open for the shortest time possible. Reason for failure to be investigated and

Identify the release point(s) and areas	Identify possible abnormal operation or failure that would lead to an odour event	What are the consequences of such an abnormal situation or failure	What measures should be in place to prevent or reduce the abnormal situation or failure	What actions should be taken and who will be responsible
				maintenance plan revised if required.
	Doors/ openings accidentally or deliberately left open	Potential for fugitive odorous emissions from open doors- may cause odour to be detected at nearby sensitive receptors.	A closed door policy to ensure building containment is not compromised.	Clear and conspicuous signs will be displayed on all external doors (inside and out). After entering and exiting the building, it will be the responsibility of all staff/ visitors to ensure doors are closed behind themselves.
Effluent treatment plant	Failure of the ETP due to reduced microbiological activity.	Potential for fugitive odorous emissions due to an increase in effluent treatment times and stored untreated effluent	Work Instruction- Failure of Effluent Plant	Responsible person would contact contractors to advise on actions required.
	Failure of the ETP due to mechanical or power failure.	Potential for fugitive odorous emissions due to an increase in effluent treatment times and stored untreated effluent	Work Instruction- Failure of Effluent Plant	Contaminated liquids from cleaning processes would be isolated and tankered off site by a licenced waste treatment company, the clean cooling water would be fed through the plant on a gravity feed.
Waste storage	High ambient temperature resulting in the release of offensive odours.	Uncontrolled release of odours from open area source- potential to lead to odour annoyance at sensitive receptors.		The frequency of skip removal would be increased.

6. ROUTINE MONITORING, RECORDING AND REPORTING

Monitoring has an important role to play in assessing the effectiveness of operational practices to prevent and contain odours; and in assessing the nature and extent of an odour problem should it arise.

This section of the N&OMP describes how the effectiveness of operational practices and controls will be checked by:

- monitoring of changes on site; and
- monitoring of effects off site (at the site boundary and beyond).

6.1 General Approach to Monitoring

Cambrian will monitor emissions at their source (i.e. on site) to ensure releases do not result in impacts on noise or odour amenity at sensitive receptors. In the widest sense this monitoring will consist of inspection of raw materials, the manufacturing process, buildings and equipment to check that emissions are being contained and controlled.

6.2 Monitoring of Noise and Odour at the Site Boundary

The routine monitoring techniques to be employed at the site - sniff tests and complaints monitoring - are recognised as appropriate tools in current best-practice for odour assessments by Natural Resources Wales (NRW).

It is not appropriate to set "boundary limit" values for sniff tests and complaints monitoring. These routine monitoring techniques do not generate absolute, quantitative results that can be compared to a limit value, but a subjective and subject to validation by checking activities on site and complaints. The monitoring is designed to act as a trigger for management actions and investigations if they indicate a problem.

Details of how the results will be recorded and submitted, and action plans for investigation, remedial measures and procedural changes in the event of detected abnormal emissions, are given in Section 6.4.

6.2.1 Sensory Field Odour Assessment by the 'Sniff Test'

Monitoring of odour exposure by sensory field odour assessment ("sniff testing") uses odour assessors to record the attributes of the odour. The assessment is "sensory" in that the human nose is used as the detector as no analytical instrument can give a unified measure of a complex mixture of compounds. This technique is recommended by the NRW guidance as being suitable for daily monitoring of odours at the boundary of the site.

Cambrian's Technical Department carry out a routine walkover survey incorporating noise assessment and sniff testing at the site boundary. The testing is undertaken daily at two of the five sampling locations (M2 and M3) shown on the Noise & Odour Monitoring Points Plan, shown in Appendix A, identified as the closest to the nearest residents, with weekly testing at the remaining three locations carried out on different days and at different times. Records of monitoring are kept in the Lab Office.

The sensory field odour ("sniff test") assessments will be carried out based on the NRW Sniff Test protocol in their H4 guidance. The person carrying out the sniff test will be rotated on a regular basis to ensure reliability; anyone who has been working within the facility for an extended period will not conduct that day's test.

Details of how the results will be recorded and submitted are given in Section 6.3. Sniff testing is designed to detect any abnormal odour emissions. In the event that abnormal noise or odour is detected, the source of the noise or odour would be investigated (see Section 7.3.2) and remedial action taken, as necessary, as described in Section 6.3.

6.3 Noise and Odour Complaints

Cambrian have implemented a system of complaints monitoring and analysis. Complaints are collected, registered and validated as described in Section 7.3 of this N&OMP.

6.4 Recording of Results, Reporting and Actions

6.4.1 Recording of Results and Reporting

Recording of results

Cambrian will maintain records of all monitoring carried out under this N&OMP, including records of the taking and analysis of samples, instrumental measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

Reporting

Any records made under the requirements of this N&OMP will be retained on site and made available for inspection by NRW on request.

7. MANAGEMENT ISSUES

This section of the N&OMP provides information on:

- Staff responsibilities;
- Staff training;
Complaint management, investigation and resolution procedures; and
- Communications with external stakeholders.

7.1 Roles and Responsibilities

Cambrian is committed to effectively managing the impacts of noise and odour from the facility. This commitment extends from policies produced at director level, to the resources available to the competent personnel, to the abilities of the personnel managing noise and odour-critical work tasks. This section describes the responsibility for the management and operation of the factory.

- The factory is managed by an Operations Director who has overall accountability for ensuring that noise and odour does not cause a nuisance.
- Process operational staff are also responsible for making observations of general process performance during their attendance on the site. When carrying out their daily routine duties, staff are instructed to note and observe any unusual noise or odour occurrences and to report these to a Supervisor or Manager.
- Maintenance is provided by specialist contractors who carry out routine preventative maintenance and reactive breakdown maintenance.

7.2 Training and Competence

7.2.1 General Procedures for Training and Competency of Staff

Training and competency of staff is controlled by Cambrian and includes induction training for new employees, awareness training for all and specific training as required. Contractors and all persons performing tasks on behalf of the Company will be made aware of the policies and relevant Management System requirements and will be competent in the roles undertaken.

7.2.2 Training and Competency of Operational Staff

All staff at the factory are made fully aware of the need to be constantly vigilant with regard to site noise and odour control and management procedures.

Staff responsible for the operation, maintenance or repair of noise or odour-critical plant will be trained and competent. Records will be maintained (documented training records) demonstrating compliance with this. In order to minimise risk of emissions, particular emphasis will be given during training to:

- awareness of their responsibilities for avoiding noise and odour nuisance;
- minimising emissions on start-up and shut-down; and
- actions to minimise emissions during abnormal conditions.

Management will maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment.

7.3 Complaints Handling and Communications

Cambrian has in place a comprehensive system of monitoring and inspection to check noise and odour control measures are functioning effectively at the factory. However, in the event that a

noise or odour complaint is received, it is important that complaints are properly and systematically dealt with, and acted upon.

Cambrian will maintain a register of all complaints and in all cases managers shall ensure that all complaints have been adequately handled and that any measures necessary to prevent a recurrence have been put in place.

This section of the N&OMP describes:

- How Cambrian will respond to any noise or odour complaint;
- How Cambrian will investigate any noise or odour complaints, take the appropriate steps and actions, and keep stakeholders informed; and
- How Cambrian will communicate to appropriate bodies routinely and in response to any incidents or planned maintenance.

7.3.1 Complaints Management and Registration

The following procedure for dealing with noise and odour complaints is based on guidance from Defra in the *Code of Practice on Odour Nuisance from Sewage Treatment Works*. It describes who is responsible for dealing with the different aspects of the complaint.

Publicising contact details for noise and odour complaints

Members of the public are able to contact Cambrian either in person or by telephone with any noise or odour complaints about the factory and the manufacturing process.

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

Complaint registration

Cambrian will maintain a record of all complaints received. In the event that Cambrian receives a complaint alleging noise or potential odour nuisance from the factory:

- the complaint will be registered; and
- complaints data will be recorded in a systematic way, enabling comparison with standard noise or odour descriptors, with wind direction and with site work activities.

Collecting the relevant complaint details

The recommended minimum information that needs to be collected for each complaint is:

- the time and date when the noise or offensive odour was observed;
- the location (within approx. 100 m) where the noise or offensive odour was observed, e.g. postal address, grid reference) and its sensitivity;
- the Complainant`s description of noise or odour. This should include a subjective description of all the factors necessary to make an assessment of the impact of the noise or odour, including intensity, character (preferably on the basis of a choice from standardised descriptors given in Environment Agency Technical Guidance Note H4), relative unpleasantness (either pleasant, unpleasant or neutral), frequency and duration;
- the identity of the complainant, if possible, to assess the repeated nature of complaints;
- the residential address of the complainant; and
- any other information the complainant can offer on activities at the alleged noise or odour source.

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

- wind direction and speed, and atmospheric stability class at the time of complaint; and
- any process incidents at the time of complaint.

7.3.2 Investigation of Noise and Odour Complaints

This escalating response procedure shows what investigative actions will be taken in response to a complaint. The aim of the investigative actions will be to establish:

- the source of the noise or odour complaint; and
- the impact of the noise or odour.

A series of investigative tools, of increasing sophistication, will be used until these two questions can be satisfactorily answered. This then enables the appropriate controls to be applied if the impact is significant and the source is confirmed as the Cambrian factory.

Complaint screening

Investigation will start with an initial screening of the complaint. If the screening process “fails to confirm” the noise or odour incident, the investigation will stop at that point. If the screening process confirms the noise or odour incident, then a more detailed investigation is carried out.

The object of the initial screening is to quickly identify those noise or odour complaints that are unlikely to be due to the factory, perhaps because they result from some other activities in the area.

Initial screening should consider the following:

- knowledge of potential sources at the factory (tie-up with work activities in progress, any plant problems, etc);
- knowledge of potential sources in the locality other than the factory;
- wind direction at the time of the alleged noise or odour episode;
- distance and direction of the complainant from site; and
- concurrent noise and odour monitoring data (e.g. daily perimeter monitoring).

If an odour assessor is able to attend rapidly after a complaint it may be possible to carry out effective appraisal of the complaints independently by a sniff test.

Cambrian will liaise with local stakeholders (including the complainant) and inform them on the outcome of the screening assessment of the complaint and whether or not any action is to be taken.

Further investigation of the complaint

If the initial screening is unable to discount the factory as the source of the complaint, then further investigation will be carried out, which will either 'confirm' and 'further characterise' the incident as due to the manufacturing process, or it will 'fail to confirm' the incident.

Further investigation will be by means of a graded response, designed to answer the questions:

- Is the episode due to the factory? (i.e. source verification); and
- How bad is the episode? (i.e. assessment of impact).

Cambrian may use noise and odour monitoring (including, but not necessarily restricted to sniff testing and perimeter monitoring) to provide data to answer these questions, or provide additional confirmation. The monitoring effort is increased in a graduated way until the data generated is sufficient to answer the relevant questions being asked. If the level of monitoring being carried out at a particular stage in the graded response cannot answer the question (either

at all, or with sufficient confidence to satisfy stakeholders) then monitoring should move to the next level.

As well as monitoring, Cambrian may be able to obtain more detailed information from operator records about process conditions, observations or inspections at the time of complaint – this would allow noise and odour trends to be identified and possibly reconciled with particular process operations or maintenance.

7.3.3 Communicating with External Stakeholders

Communicating with NRW

In the event that a substantiated complaint is made by a member of the public about any matter associated with the factory, Cambrian will give notice in writing to NRW no later than one working day after the complaint is received. This written notification will normally be in the form of an email. The notification will include a description of the complaint, the name and address of the person making the complaint and the action proposed as a result, unless agreed by NRW.

Depending on the nature of the complaint, it will not always be possible to resolve the matter within this short timescale. In such cases an indication will be given that further investigations are necessary.

Communicating with complainants

In the case of answerphone messages, a return call will be made as soon as possible and within 48 hours. In the case of complaints submitted by email or by letter, a written response will be made within 5 working days of submission of the complaint for complaints made by members of the public.

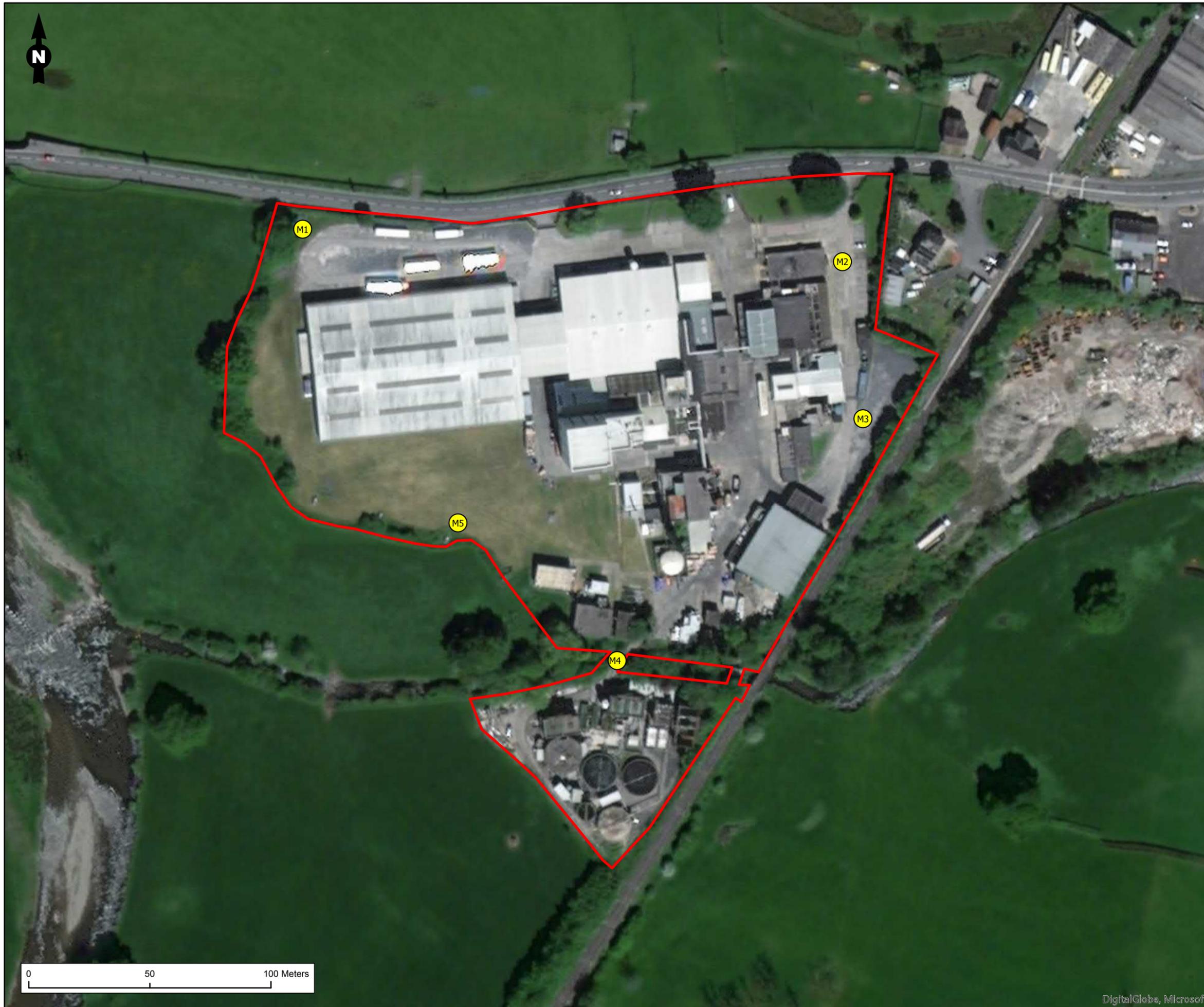
The primary reasons for further investigation of complaints are to assess potential nuisance and identify the likely cause and source of the noise or odour so that nuisance can be reduced or stopped. In the case of further investigations, Cambrian will communicate to the complainant the course of actions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

7.4 N&OMP Updating and Review

The N&OMP will be regularly reviewed and updated as necessary.

APPENDIX 1

NOISE & ODOUR MONITORING POINTS



Legend

- Site Boundary
- Monitoring Points for Odour & Noise

Figure Title
Noise & Odour Monitoring Points

Project Name
 Tywi Valley Food Park, Llangadog,
 Carmarthenshire, SA19 9LN

Project Number 1700001923	Figure No. 5
Date September 2018	Prepared By GM
Scale 1:1,500 @A3	Issue 1

Client
Cambrian Pet Foods Ltd



DigitalGlobe, Microsoft