

ODOUR MANAGEMENT PLAN

Prepared for: **Duncan McKenna**

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DOCUMENT CONTROL SHEET

PROJECT:	Duncan McKenna, Cwmgwili
TITLE:	Odour Management Plan

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Version	Date	Amendments
Original	August 2020	
Rev 1	January 2021	Removed reference to the Environment Agency in place of Natural Resources Wales instead. Included details of local sensitive receptors on plan and within Table in body of report. Included typical meteorological conditions present at site and wind rose of weather station located at Cross Hands within 2km of the site. Updated details on site operator method for determining unfavourable conditions on site and timescales for corrective action to take place.
Rev 2	February 2021	Included omitted sensitive receptor plan in a new Appendix C – Drawings.

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DUNCAN MCKENNA – CWMGWILI

ODOUR MANAGEMENT PLAN

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1.0 INTRODUCTION

McKenna Waste Ltd operates a household, commercial and industrial (HCI) waste transfer station.

This OMP will allow McKenna Waste Ltd to implement an action plan should the site operatives detect an odour presence, receive complaints from local business and should Natural Resources Wales (NRW) suspect odour emissions from the site during an inspection.

2.0 SITE LOCATION

The site is located on Land Adjacent to Ty Newydd, Thornhill Road, Cwmgwili, Llanelli, SA14 6PT

3.0 SITE MANAGEMENT

The site Owner/Operator (site management) will be responsible for the general management of the site including the acceptance and handling of any potentially odorous wastes.

The operator will ensure that site management, delegate site documentation (which includes this OMP) in addition to all relevant company procedures to operational staff to ensure they are familiar with the requirements and conditions of the site and document

4.0 WASTE TYPES AND QUANTITIES

The waste types handled on site will be non-hazardous household, commercial and industrial wastes. The maximum amount of waste to be stored on site at any one time is 300m³.

If the maximum storage capacity of the site is reached, no further waste will be accepted until such time waste can be removed from the site and taken to a suitably permitted or exempt site.

5.0 ODOUR RISK ASSESSMENT

5.1 Methodology

This OMP has been completed to identify where the likely risks are in relation to surrounding land uses. This assessment has been used to inform Section 7.0 of this OMP with regard to specific odour monitoring procedures.

5.2 Odour Intensity

The table below highlights the intensity of the odour and provides a description by which to measure the intensity: -

Odour Intensity	Criteria
Negligible	No detectable odour
Low	Faint odour (barely detectable)
Moderate	Moderate odour easily detected while walking (possible interference)
High	Strong odour (bearable, but offensive)
Severe	Very strong odour (almost unbearable)

Human sensitive receptors identified within 1km of the site are visible in the table below and overleaf. Drawing 275-01-06.D05 in Appendix C meanwhile shows sensitive receptors within 1km of the site:-

Sensitive Receptors Identified Within 1km of the Site: -

Receptor Name	Receptor Address	Distance and Direction from Site	Company Details (if Applicable) and Telephone Contact Details
Tŷ Llwyd Fâch	Tŷ Llwyd Fâch, Thornhill Rd, Llanelli SA14 6PT	140m (W)	n/a
Adept GRP	Unit 4/Heathfield Ind Est/Thornhill Rd, Llanelli SA14 6PT	250m (SE)	01269843355
Pendragon Waste & Skip Hire Ltd	Tyllwyd Isaf, Thornhill Rd, Penygroes, Llanelli SA14 6PT	305m (SW)	01269844270
Plas Y Bryn Nursing Home	Thornhill Rd, Cwmgwili, Penygroes, Llanelli SA14 6PT	420m (S)	01269844454
Cwmgwili Village	Cwmgwili Penygroes Llanelli	655m (S)	n/a
Parc Menter Industrial Estate	Parc Menter Cross Hands Llanelli SA14 6RA	805m (NW)	NR Evans Logistics - 01269842330 Wincanton Logistics 01269833754 Combidrive – 01269834848 SA15 Car Sales - 07812335015 Absolute Motocross - 01269844009
Ron Skinner & Sons	11b Heol Parc Mawr, Cross Hands, Llanelli SA14 6RE	925m (N)	01495713400
Castell Howell Foods Ltd	Cross Hands Food Park Cross Hands Llanelli Carmarthenshire SA14 6SX	945m (NW)	01269846060
Shufflebottom Ltd	Business Park, Heol Parc Mawr, Cross Hands, Llanelli SA14 6RE	980m (N)	01269831831
Welsh Holiday	Preswylfa, Pontardulais Rd, Cross	980m	n/a

Receptor Name	Receptor Address	Distance and Direction from Site	Company Details (if Applicable) and Telephone Contact Details
Lettings	Hands, Llanelli SA14 6PD	(W)	
Capel Hendre Park	55 Banc Y Ddraenen, Capel Hendre, Ammanford SA18 3SR	990m (E)	n/a

5.3 Receptor Sensitivity

The table below outlines the receptor sensitivity to odour which will be used when determining nearby odour sensitive receptors: -

Sensitivity of Receptor	Criteria
Low	Industrial workplaces that also create emissions
Medium	Industrial workplaces
High	Clean Industrial workplaces (e.g. food business)

5.4 Risk Matrix

The odour risk in any particular event can be established using the risk assessment matrix given in the table overleaf:-

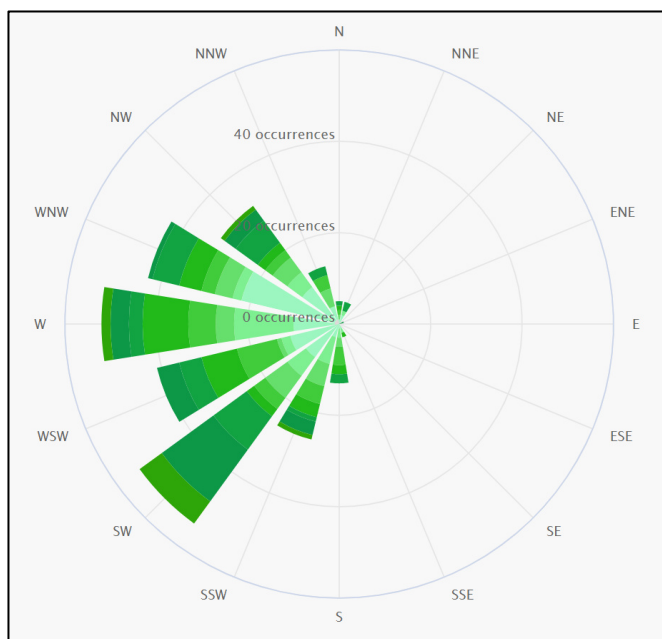
		Sensitivity		
		Low	Medium	High
Intensity	Negligible	NEGLIGIBLE	LOW	LOW
	Low	LOW	LOW	MEDIUM
	Moderate	LOW	MEDIUM	MEDIUM
	High	MEDIUM	MEDIUM	HIGH
	Severe	MEDIUM	HIGH	VERY HIGH

5.5 Typical Meteorological Conditions Experienced at the Site

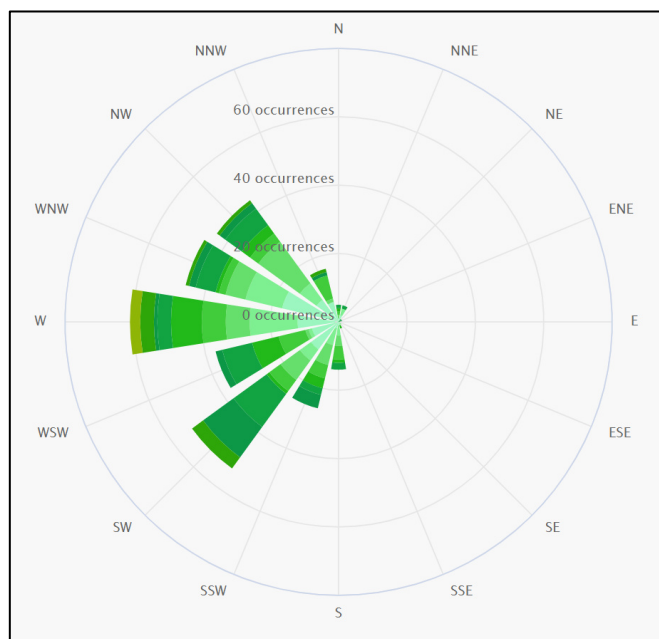
It is important to understand the prevailing wind conditions present at the site in order to determine the likely effect of odour on sensitive receptors within the vicinity of the site on a day-to-day basis.

The following wind roses show data for the last 6 months at weather stations in Cross Hands (~1.9km NW of the site) and Capel Hendre (~1.6km E of the site): -

**Cross Hands Weather Station Wind Rose
(51.79°N 4.09°W): -**



**Capel Hendre Weather Station Wind Rose
(51°78 4.04°W): -**



From the wind roses above, it can be observed that the general wind direction experienced in this location is from a NNW to SSW direction, with the prevailing wind being recorded from the SW in Cross Hands and W in Capel Hendre.

Given the majority of sensitive receptors are located upwind (from the data above) of the site, the effect of odour on these receptors is likely to be negligible. The sites most likely to be impacted by odour from the site are Adept GRP, 250m SE of the site, and Plas Y Bryn nursing home, 420m to the south, from the general trends observed in the wind roses above.

It should be noted of course that the wind roses above are not definitive, and although they show prevailing wind conditions at the site, gusts and changes in wind direction can happen organically, and as such, consideration should be made for all sensitive receptors in close proximity to the site. In addition, the wind data available for this location is limited, and as a result should not be considered a definitive resource for conditions present at all times on site.

6.0 POTENTIAL SOURCES OF ODOUR

6.1 General Waste - Storage Prior to Processing

General mixed waste will be delivered to site. Whilst these wastes are not commonly associated with odorous emissions, they do contain some fine organic materials which can, in some cases, be attributed to a general “musty” odour. This smell is exacerbated following ingress of rainwater which occurs predominantly whilst the wastes are resident in skips/containers at the sites of production and prior to receipt at the site.

Whilst not common, these wastes have the potential to contain materials of a putrescible nature which are not identifiable until the load has been agitated at the site.

6.2 Background Odour Sources in the Area

The primary off-site source of odour would be associated with agricultural processes and a nearby dog kennels. Odour release could also be the result of abnormal weather conditions, machinery breakdowns and human error.

In order to determine whether complaints are the result of activities from the site or from other nearby sites an odour complaints form will need to be completed in line with the company's complaints procedure which is attached in Appendix A.

7.0 ODOUR CONTROL

7.1 Site Operations

Limiting odour from the waste recycling facility can best be achieved through employing effective site management and good general practice. It is much easier minimising odours in the first instance than dealing with problems once they occur.

This section addresses the general site management guidelines and identifies specific procedures to combat against odorous emissions.

7.2 Receiving Wastes

Rigorous control of wastes delivered to the site is required, with contaminated or odorous wastes rejected in line with the procedures outlined in the EMS and the EP. Trained competent staff are in place to recognise odorous material and to inspect incoming wastes as it is deposited at the site.

Each incoming load will be visually inspected as it is deposited. Particular attention will be given to the identification of non-conforming waste. Malodorous waste will be returned to the producer or sent to another authorised facility for treatment. Waste suppliers and HGV skip vehicle drivers are required to ensure that only acceptable material is brought to site to minimise the incidence of rejection.

All details will be recorded in the site diary and an incident report form is completed.

McKenna Waste Ltd, hire out skips to customers for a maximum of 2 weeks meaning that the waste received is unlikely to generate significant odorous emissions unless upon tipping.

If the site reaches capacity and/or operational difficulties occur, the site will cease to accept waste and incoming wastes will be diverted to another authorised treatment facility.

Incoming mixed waste will be processed as soon as practicably possible to ensure that any other malodorous (or potentially malodorous) wastes contained within the incoming mixed waste which were not identified during deposit can be identified, isolated and rejected without delay.

7.3 Storage of Wastes

Low storage volumes and strict turnaround of biodegradable wastes on site in accordance with the Management System will be observed.

All skips will be delivered in good condition and stored on site for the minimum amount of time. They should be processed with priority and turnover is expected to be quick. A maximum storage time for waste on site of 3 months has been allocated.

The remaining waste and materials which will be stored are considered to be of low risk in respect of odour emissions, nevertheless, storage times are suitably short to ensure the risk is further mitigated.

Waste will be stored to ensure compliance with the EP and as detailed within the EMS, FPP and this OMP document.

7.4 Loading and Transport of General Wastes

In all cases, the drop heights of mixed waste will be kept to an absolute minimum.

All waste vehicles leaving the site containing light and/or potentially malodorous wastes will be securely sheeted or enclosed at all times.

7.5 Housekeeping

Regular cleaning of operational areas (i.e. minimum once daily) will be carried out to discourage odour generation from old degrading materials.

7.6 Liaison with Neighbours

In the extreme event of significant but temporary odour releases outside normal operations, neighbours will be contacted to advise them of the situation and the action being taken. NRW will also be notified.

An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.

If any odour complaints are received, a Complaint Form will be completed (form in Appendix B), which will be kept for inspection on request by NRW. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). Odour complaints will be investigated and responded to within 24 - 48 hours and suitably reviewed by the site manager who is ultimately responsible.

The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the regulator or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint. If there are significant odour releases outside normal operations, the operator will cease operation, investigate and resolve the issue before continuing.

8.0 TRAINING

Management, Site Foreman, Admin Staff and sub-contractors of McKenna Waste Ltd involved with potentially odorous materials and their handling will receive training to recognise odour levels of concern and complaint handling.

Training will be given to all relevant persons to make sure they are competent in completing olfactory assessment survey forms, odour complaint report forms and the odour diary to ensure sufficient monitoring and reporting of odours can be carried out.

9.0 MONITORING

9.1 Monitoring Odorous Releases

McKenna Waste Ltd will use the following techniques to monitor odorous releases:-

- Complaints Monitoring;
- Odour Diaries (when necessary).

9.2 Odour Monitoring Procedure

Sniff testing will be carried out weekly or as necessary (i.e. increased regularity should the management have reason to suspect odorous emissions from the site). Assessments will be carried out both routinely and in response to specific complaints.

The assessor will ensure they do not: -

- a) Smoke or consume strongly flavoured food or drink for at least 30 minutes before the assessment.
- b) Consume confectionary or soft drinks immediately before the assessment.
- c) Apply scented toiletries, such as perfumes or aftershave immediately before an assessment.

Complaint response will involve the routine assessment monitoring and further off-site monitoring. The off-site monitoring should be downwind of the site, progressing towards the site boundary and then away from the site in an upwind direction.

10.0 COMPLAINTS MONITORING

All odour complaints will be investigated promptly and appropriate remedial action will be taken if the complaint is validated (as per sections 4.6.2-4.6.4); for example, removing odorous materials off site as soon as reasonably possible. Complaints will be recorded on the form found in Appendix B.

Complaints to NRW or the Local Authority will also be recorded and taken into account. An olfactory assessment survey will be carried out from where the complaint was made and from any convenient locations between the complainant/receptor and the site so that the complaint can be validated or rejected.

11.0 ODOUR DIARIES

If members of the local community are frequently reporting odour issues in the vicinity, then they will be asked (if agreeable) to keep an odour diary.

This will help to build up an account of when the odour occurs, their location and the site operations that were being carried out at the time, as well as the duration of the activities taking place. Any obvious problems can then be addressed efficiently, whilst also ensuring that a good relationship with the local community is maintained.

12.0 CONTINGENCY PLANS

12.1 Contingencies and Emergency Plans

In accordance with NRW's guidance on OMP's, contingency plans have been prepared to react to situations where: -

"monitoring indicates that a potential odour source is not completely under control, meteorological conditions are unfavourable or that adverse impact has occurred"

If excessive odours are detected at the site boundary, other monitoring point or a complaint is received, the following remedial procedures will be taken: -

Firstly identify the odour source; is it from: -

- Site operations; or,
- An off-site source (e.g., another waste management station).

If on site: -

- Report incidence to the site or technically competent manager;
- Identify the point of release of the odour;
- Identify the cause of the release;
- Identify a solution;
- Implement the solution;
- Carry out olfactory tests to check the mitigation measures are working;
- Record actions taken on relevant forms and site diary as required by this plan.

Actions to be taken if odour is being produced on site: -

- a) **Normal Operations:** The offending odour will be traced and the reason for the cause of the problem will be investigated. Once solutions are in place, olfactory monitoring will be carried out to ensure the solutions put in place are having the desired effect.
- b) **Abnormal Conditions:** Adverse weather conditions can promote generation of odour and inhibit its effective dispersion; e.g., hot weather with little wind, resulting in increased risk of odour to receptor locations, or wind conditions diverging from those normally experienced on site leading to sensitive receptors who would not normally be impacted by odour from the site being affected by site activities (for example, Tŷ Llwyd Fâch located 140m W of the site would not normally be affected by odour from the site, due to prevailing SW winds, however, winds from the E would have a larger impact upon this sensitive receptor if malodorous waste was present on site at that time). In the event that malodorous waste is identified on site, in conjunction with unfavourable weather conditions, odour causing operations will cease until more favorable meteorological conditions return.

For the context of this site, unfavourable conditions would include: -

Northern / North-easterly winds: - in the event that malodorous material may be present on site, winds from the north and east would lead to the odour dispersing to sensitive residential and commercial receptors which are located predominantly to the west and south of the site (the closest of these being Tŷ Llwyd Fâch located 140m W of the site).

Hot, days with very light / no wind: - warm weather conditions promote the breakdown of organic materials and lead to the biodegrading of these materials at a quicker rate. The lack of wind can lead to these malodorous smells lingering in the air, which would likely impact the closest sensitive receptors to the site, namely the residential Tŷ Llwyd Fâch located 140m W of the site, Adept GRP commercial premises 250m SE of the site and the commercial premises of Plas Y Bryn nursing home, 420m S of the site.

A windsock present on site will provide a visual indication of the direction of the wind movement on each working day. In addition, weather conditions for the upcoming week will be checked every Monday morning using Met Office data available online, whilst the same resource will also be checked every morning at the

beginning of each shift to ensure that best practice techniques are maintained wherever possible to reduce the impact of odour on nearby sensitive receptors.

12.2 Corrective Actions for Various Situations

The table below summarises the various problems likely at the site and the standard responses available, which will assist in reducing odour potential on site.

Process	Issue	Corrective Action	Timescale of Action
Waste delivery (tipping)	Deposit of odorous load	Isolate material. Reject material giving rise to odour.	Malodorous material is not to be accepted on site and will be rejected immediately
Stored wastes (general)	Odorous emissions detected	Olfactory/sniff test required to pinpoint source. Ensure procedures outlined in Section 5 are adhered to in full. Remove malodorous waste to a suitably licensed facility	Malodorous material identified on site is to be isolated from the rest of the waste and stored within the quarantine zone present on site. Arrangements are to be made to have the material removed for disposal at a suitably licenced facility the same day and material must be removed from site no later than 24-hours after it is identified

13.0 OMP MANAGEMENT

This OMP will be reviewed at least annually unless it becomes apparent that the activities are giving rise to pollution outside the site due to odour, in which case it will be revised within 7 days and a copy forwarded to NRW for approval before implementation. It may also be revised upon request from NRW, should the permit be varied, to include new waste types, transferred, surrendered etc.

APPENDIX A
Complaints Procedure

COMPLAINT RECORDING PROCEDURE

Any complaints received will be recorded on a Complaints Form. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager will complete the form.

- 1) The name, address and telephone number of the caller will be requested;
- 2) Each complaint will be given a reference number;
- 3) The caller will be asked to give details of:-
 - a) the nature of the complaint;
 - b) the time;
 - c) how long it lasted;
 - d) how often it occurs;
 - e) is this the first time the problem has been noticed; and
 - f) what prompted them to complain.
- 4) The person completing the form will then, if possible, make a note of:-
 - a) the weather conditions at the time of the problem (rain, snow, fog etc.);
 - b) strength and direction of the wind; and
 - c) the activity or activities taken place on the site at the time the noise was detected, particularly anything unusual.
- 5) The reason for the complaint will be investigated and a note of the findings added to the report;
- 6) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future;
- 7) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be invited to contact the Environment Agency and or the Local Authority.

Note: Following any complaint the relevant manager will be viewed to ensure appropriate actions are in place to counter any problems.

APPENDIX B
Complaints Form

COMPLAINT FORM

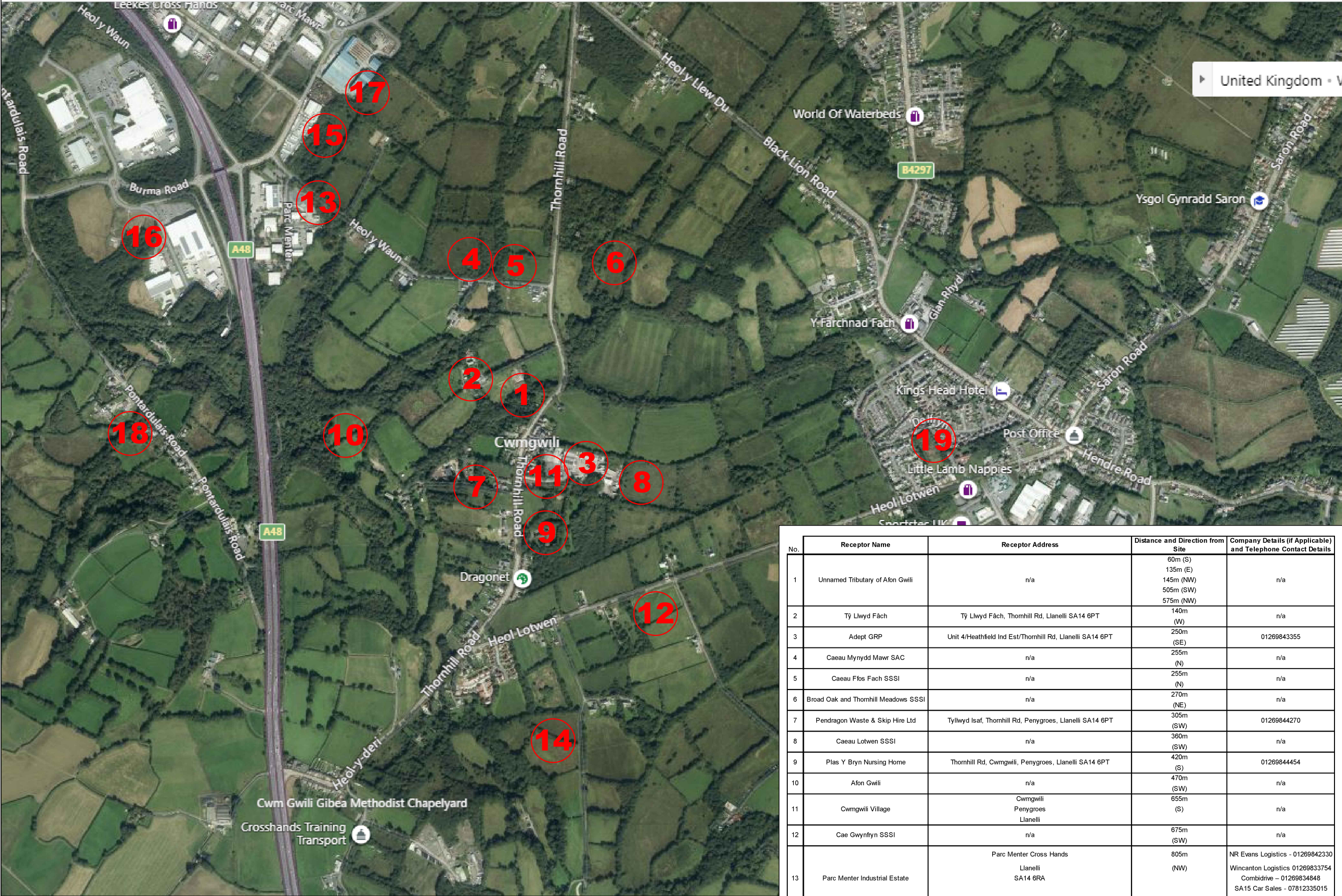
Date Recorded:	Reference Number:
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of Complaint (noise, odour, dust other / time, date , duration)	
Weather at time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other comments relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out at time of complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back to complainant	
Recommendations	
Change in procedures	
Changes to Environmental Management System (EMS)	
Date changes implemented	
Form completed by	
Signed	
Date completed	

APPENDIX C

Drawings



United Kingdom



No.	Receptor Name	Receptor Address	Distance and Direction from Site	Company Details (if Applicable) and Telephone Contact Details
1	Unnamed Tributary of Afon Gwili	n/a	60m (S) 135m (E) 145m (NW) 505m (SW) 575m (NW)	n/a
2	Tŷ Llwyd Fâch	Tŷ Llwyd Fâch, Thornhill Rd, Llanelli SA14 6PT	140m (W)	n/a
3	Adept GRP	Unit 4/Heathfield Ind Est/Thornhill Rd, Llanelli SA14 6PT	250m (SE)	01269843355
4	Caeau Mynydd Mawr SAC	n/a	255m (N)	n/a
5	Caeau Ffos Fach SSSI	n/a	255m (N)	n/a
6	Broad Oak and Thornhill Meadows SSSI	n/a	270m (NE)	n/a
7	Pendragon Waste & Skip Hire Ltd	Tyllwyd Isaf, Thornhill Rd, Penygroes, Llanelli SA14 6PT	305m (SW)	01269844270
8	Caeau Lotwen SSSI	n/a	360m (SW)	n/a
9	Plas Y Bryn Nursing Home	Thornhill Rd, Cwmgwili, Penygroes, Llanelli SA14 6PT	420m (S)	01269844454
10	Afon Gwili	n/a	470m (SW)	n/a
11	Cwmgwili Village	Cwmgwili Penygroes Llanelli	655m (S)	n/a
12	Cae Gwynfryn SSSI	n/a	675m (SW)	n/a
13	Parc Menter Industrial Estate	Parc Menter Cross Hands Llanelli SA14 6RA	805m (NW)	NR Evans Logistics - 01269842330 Wincanton Logistics 01269833754 Combidrive - 01269834848 SA15 Car Sales - 07812335015 Absolute Motocross - 01269844009
14	Felin Fach Meadows (Cwmgwili) SSSI	n/a	920m (S)	n/a
15	Ron Skinner & Sons	11b Heol Parc Mawr, Cross Hands, Llanelli SA14 6RE	925m (N)	01495713400
16	Castell Howell Foods Ltd	Cross Hands Food Park Cross Hands Llanelli Carmarthenshire SA14 6SX	945m (NW)	01269846060
17	Shufflebottom Ltd	Business Park, Heol Parc Mawr, Cross Hands, Llanelli SA14 6RE	980m (N)	01269831831
18	Welsh Holiday Lettings	Preswylla, Pontardulais Rd, Cross Hands, Llanelli SA14 6PD	980m (W)	n/a
19	Capel Hendre Park	55 Banc Y Ddraenen, Capel Hendre, Ammanford SA18 3SR	990m (E)	n/a

Job:

JD Mckenna

Title:

Sensitive Receptor (-1km)

Date: January 2021

Scale: NTS

Drawn by: AJD

Checked by: SO



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