

ENVIRONMENTAL PLAN

Odour Management Plan

EP – 01

1. PURPOSE

To ensure that emergency planning is in place to reducing risk of incidents and to minimise the risk of harm to employees, third parties and the environment.

2. SCOPE

This Management Plan provides guidance on the appropriate preparation for, and response to, foreseeable incidents arising from Natural UK's Healthcare Waste Management Facility (HWMF) activities. Natural UK Ltd acknowledges its legal duties to control and manage any harmful emissions that could arise as part of its day to day activities under part III of the Environmental Protection Act 1990, in respect of statutory nuisances. Responsibilities

3. RESPONSIBILITIES

The following personnel hold primary responsibility for ensuring that the requirements of this procedure are met. General responsibilities are summarised below:

Action	Responsibility
Ensuring that environmental response plans and equipment are in place on site.	Managing Directors Technically Competent Manager
Ensuring that staff have received appropriate training	Managing Directors Technically Competent Manager
Support and liaison	Managing Directors Technically Competent Manager
Completion of Weekly Environmental Checks	Operations Supervisor
Prompt reporting of environmental incidents	All
Reviewing environmental incidents for learning points	Managing Directors Technically Competent Manager

In certain instances, designated personnel may deputise for the Managing Director and or the Technically Competent Manager. In general, these deputies should operate within the same organisational functions as those with primary responsibility for the activity concerned. Natural UK, Natural Healthcare, NappiCycle staff frequently work on other companies sites and locations all staff must comply with those sites regulations and procedures all of the time.

4. REFERENCES

QMS -01 Working Plan

QMS -14 Management Systems Review

QMS -06 Non-Conformance Reporting

QMS -11 Health & Safety

EP -09 Emergency & Incident Response Plan

Weekly Environmental Inspection Report

5. INCIDENT PREPAREDNESS

The Technically Competent Manager (TCM) is responsible for ensuring that adequate preparation has been made both to minimise the risk of incidents and to allow adequate emergency response. These measures shall include:

Periodic review to ensure that response capability is at the desired level.

The TCM will use the results of this exercise to identify requirements (training, equipment, etc) for his site. These requirements will be communicated to Management, who will put them in place, with the assistance of the Health and Safety Manager as required. Sighting of any emergency equipment will take into account the most likely areas of its use on site, security and ease of access in emergency.

The TCM shall set up an Emergency Plan including organisation and responsibilities, general precautions, liaison with the emergency services, detection systems (where relevant) and environmental training.

Emergency call out numbers will be clearly displayed on each site. These will include:

- **Technically Competent Manager**
- **Health & Safety Manager**
- **Managing Directors**
- **The Natural Resources Wales (NRW)**
- **Health & Safety Executive**
- **Police Service**
- **Fire Service**
- **Ambulance Service**
- **First Aider(s)**
- **Spill Response contractor (if applicable)**

6. ODOUR MANAGEMENT PROCEDURE

Natural UK Ltd must employ the appropriate measures necessary to prevent pollution or minimise it when prevention is not practicable. The measures outlined in this document are a direct result of a risk assessment carried out to determine the main risk and likely impacts during the course of Natural UK and Nappicycles activities.

There are three levels of odour:

- **Unreasonable odour** – amounting to serious pollution is being or is likely to be caused (regardless of whether appropriate measures are being used). In which case operation **MUST** cease.
- **Odour** – pollution is likely to be caused beyond the site boundary, the duty is to use appropriate measures to control this. This can be determined by the local Enforcement Agencies.
- **No or low odour** – beyond the boundary unlikely.

Working on that basis to minimise the risk Natural UK will implement the following:

Control Measures to minimise the risk of odour from NappiCycle AHP waste treatment activities

- Non-hazardous, offensive AHP wastes arrives loose in sealed polyethylene bags. Wastes are tipped into the covered storage bay and loaded into the NappiCycle process as soon as practical to minimise time in storage
- Wastes are managed within the appropriate building on an impermeable surface with controlled (sealed) drainage system
- Access doors to buildings shall remain closed during processing/transfer operations.
- Maxi thermal MT1500 ozonation devices are installed to combat odour and infection caused by Bacteria, viruses, moulds, fungi and Volatile Organic compound (VOC's) found in the air and on surfaces. These must be on at all times during operational hours.
- Regular environmental checks are undertaken around the site (sniff test) and a weekly inspections carried is carried out and documented
- Incidence procedures are in place in order to act upon any nuisance, accidents, complaints or non- conformances (non-conformance /incident report)
- Floor surfaces, plant, equipment and storage containers should be cleaned and disinfected regularly. All wash waters should be contained within an impermeable surface to prevent run off. Wash waters must be drained to fowl sewer or disposed of appropriately.
- Waste storage bays should be emptied periodically to ensure waste residues are removed and the push walls and floor surfaces are cleaned and disinfected

Control Measures to minimise risk of odour from hazardous waste transfer station activities

- Hazardous clinical waste arriving on-site should already be stored within ridged leak proof containers. These containers should be unloaded from the delivery vehicle directly into lockable ridged leak proof containers for onward collection to third party facilities.
- Wastes are managed inside the appropriate building on an impermeable surfaces within sealed plastic containers and bins
- Access doors to buildings shall remain closed during processing/transfer operations.
- Maxi thermal MT1500 ozonation devices are installed to combat odour and infection caused by Bacteria, viruses, moulds, fungi and Volatile Organic compound (VOC's) found in the air and on surfaces. These must be on at all times during operational hours.
- Regular environmental checks are undertaken around the site (sniff test) and a weekly inspections carried is carried out and documented
- Incidence procedures are in place in order to act upon any nuisance complaints (non-conformance /incident Report)
- Equipment and storage containers should be cleaned and disinfected regularly. All wash waters should be contained within an impermeable surface to prevent run off. Wash waters must be drained to fowl sewer or disposed of appropriately
- All containers are to be clearly and adequately labelled at all times so that the producer, source of the wastes, contents and date of receipt can be identified. A tracking system will be in place to ensure that wastes can be identified prior to their onward dispatch. This will ensure waste is kept within the designated area for the shortest time possible. Minimising the risk of odour.

7. RECORDS

All incidents raised must be recorded and reported to the Responsible Manager to enable the causes to be investigated and to undergo a root cause analysis. This should ensure the likelihood of a re - occurrence is minimised. Records shall be kept on an incident response form and kept on file.

Weekly Environmental Inspection will be carried out by the Responsible Manager, documented and filed. Issues raised may require remedial actions and these can be documented on this form. The form should be reviewed and countersigned by the TCM or Managing Directors when the issues have been actioned or resolved.