

Fugitive Emissions Action Plan

Potential Fugitive Emission	Potential Source	Existing Controls	Additional Controls, Records, Procedure	Verification
1. Odour	- Cooking Process - Smoker - Effluent Plant	- Most cooks predominantly closed cooks, reducing odour. The site has steam ovens that are used to steam cook meat products in sealed bags. In turn the only emission to atmosphere will be steam, not odour and this will only be emitted once the cooking cycle has stopped. - Smoke is generated using friction and in turn gasification rather than combustion. By generating smoke by gasification; fewer substances of concern are generated than conventional smoking processes. Untreated timber is used. - The balance tank is covered to prevent potentially odorous air escaping. The DAF unit is housed to mitigate against odours. Due to the relatively low volumes of process effluent, the process water does not remain in the balance tank for more than twelve hours; the process water in the balance tank is continuously mixed. This combination prevents stagnation of the process effluent and the generation of odours. The sludge is contained in a tank which is covered. The area is cleaned down every day. The fat and sludge is removed twice a month at a minimum. - There have been no odour complaints in 2020.	CRH-ENV33 Odour Management Plan. DBG-ENV16 Waste & Animal By-Products Management Procedure	Internal Monthly Audit, ABP / General Waste Removal Documentation.

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	Waste Bins/Compactor	Waste meat stored internally until collected. Food waste placed in a separate bin for collection weekly. Waste receptacles are removed at regular intervals in covered containers to prevent against the production of odours.		
2. Diesel Spill	- Refuelling trailers - Tank failure - Pipeline failure - Bund failure	Bunds visually inspected on a daily / weekly / monthly basis. Bund integrity inspection conducted every 3 years. All surrounding drains run to the effluent plant. No risk of surface water contamination. Spillage procedure in place. Spill kits in place	DBG-ENV38 Spillage Procedure. EVP034 Penstock Gate Operation procedure to prevent contamination entering water course. CRH-ENV19 Fuel Delivery Procedure. CRH-ENVR36A Site Environmental Incident Response Plan. DBG-RNV36 Environmental Incident Response Procedure	Internal Monthly Audit / Bund Inspection Reports
3. Chemical Spill / Chemical usage	- Off loading - Container Failure - Bund Failure	Bunds visually inspected on a daily / weekly / monthly basis. Bund integrity inspection conducted every 3 years. Offloading only takes place on hard standing.	DBG-ENV38 Spillage Procedure. EVP034 Penstock Gate Operation to prevent	Internal Monthly Audit / Bund Inspection Reports

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		Spillage procedure in place. Spill kits in place All drains in this area go directly to the effluent plant. Only small quantities of chemical stored at site. All chemicals are banded Main chemicals are diluted by dosing machines. Dilutions of detergent and disinfectant is verified by technical department. CIC cards are available detailing dilution requirements and communicated to appropriate operatives.	contamination entering water course. CRH-ENVR36A Site Environmental Incident Response Plan. DBG-RNV36 Environmental Incident Response Procedure	
4.Refrigerant Leak (Ammonia Leak)	Refrigeration System	- Alarm system in place. Engineering on site 24 / 7. Ammonia detection heads calibrated as recommended by manufacture - Emergency response plan in place. - Closed Ammonia system in place. - Maintenance contract in place – a) regular inspection pipe joints, shaft seals and gaskets in the refrigeration plant using proprietary leak detection equipment b) System log book is kept with Refrigerant – quantity of refrigerant and oil added to or removed from the system recorded on contractor service records.	Service records from contractor in engineering office. CRH-ENVR36A Site Environmental Incident Response Plan. DBG-RNV36 Environmental Incident Response Procedure	Internal Monthly Audit

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5.Effluent	WWTP Pipelines	- All pipes are within the collection area of the WWTP and any leak will drain back into the main sump - Ground – Concrete, sloped back into sump. - High level alarm on sump	DBG-ENV38 Spillage procedure. EVP034 Penstock Gate Operation procedure. High level alarm system on balance tank and screw. Daily pipework inspection on morning checks by Facilities. DBG-ENV16 Waste & Animal By-Products. Management Procedure CRH-ENVR36A Site Environmental Incident Response Plan. DBG-RNV36 Environmental Incident Response Procedure.	Internal Monthly Audit

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