

Odour Management Plan

Finer By Nature Ltd

Odour Management Plan

Site details

Site name: **Finer By Nature Ltd**
 Site address: **Unit 1, AB&C Whitestone Business Park, Hereford. HR1 3SE**
 Operator name: **Finer By Nature Ltd**
 Permit number:

Who this plan is for

- Who should be made aware of this plan?
 - All Finer By Nature Staff
 - Contractors conducting work that may impact the site
- How will they be made aware?
 - Staff training on induction
 - Staff conducting specific tasks will be trained in those tasks
 - Contractors will be inducted based on the task to be undertaken

Document owner

Document author: **Gary Pitchford (Director)**

Version number: **1**

List of revisions

Revision number	Revision authorised by	Date submitted to Environment Agency	Revision owner
1	Gary Pitchford	14 th July 2022	Gary Pitchford

For this document there are 2 revision lists. One for the OMP (Above) as a whole and one for a subset of information based on the HACCP. The HACCP contributes important information to the OMP but also stands alone in its own right. Both revisions will be maintained and updated accordingly

Contents

Table of Contents

- 1. Introduction.....5
 - 1.1 Site description.....5
 - 1.2 Maintenance and review of the OMP.....5
 - 1.3 Relevant sector guidance on which this OMP is based6
- 2. Receptors8
 - 2.1. Receptor List.....8
 - 2.2. Wind rose and source of weather data10
- 3. Sources of odour and site processes.....11
 - 3.1 Odorous materials entering and leaving site11
 - 3.2 Odorous materials13
 - 3.3 Overview of odorous processes and emissions14
- 4. Control measures and process monitoring19
 - 4.1 Appropriate measures / BAT19
- 5. Odour reporting.....22
 - 5.1 Complaints reporting22
 - 5.2 Community engagement22
 - 5.3 Pro-active odour monitoring22
 - 5.4 Reactive odour monitoring.....22
- 6. Abnormal events.....24

1. Introduction

1.1 Site description

The site in which Finer By Nature Ltd is based is a busy working business park based at Whitestone Herefordshire. The site itself has been in place for many years although has seen some modernisation over the years. In times gone by the FBN building was a former tile works and is probably the oldest building in the park as a whole. The FBN building is located on the western edge of the park next to the main entrance. The overall setting is rural with domestic dwellings in the area

- brief description of type of site, e.g., abattoir, in-vessel composting (full details of operations to be described in Section 3)
 - The building itself is made up of 11400 sq ft of warehousing and a small office space. The warehousing is divided in to 3 distinct area, Unit A is used for storage of dry goods and is used for pick, pack and dispatch. Unit B is used for storage and also contains a small retail outlet. Unit C is used for the production of raw dog food along with storage freezers and at the rear of unit C is a small office area.
- describe the site location, e.g. industrial area, countryside etc.
 - The site location is at Whitestone, a small village located around 3 miles outside Hereford centre. The location is rural with surrounding farmland and a number of domestic dwellings. The site is part of the Whitestone Business Park, a well-established and long-standing park of around 30 businesses.
- state the days and hours of operation
 - The days and hours of operation vary depending on the time of year. In all but the summer months the working day is 8am until 5pm. In the summer months these change to 6.30am until 2.30 for most staff although there is a presence in the building until 5pm
- any other information you feel is relevant
 - Three quarters of the building is used for warehousing and dispatch activities. The retail outlet is open on a Saturday.

1.2 Maintenance and review of the OMP

- who (Job Title) is responsible for the OMP and ensuring people are trained?
 - There are three people responsible to ensure training is conducted. Two directors and day to day is our Operations Manager
- where is the plan stored?
 - Our plan is stored along with other compliance paperwork in our office and is managed by our office administrator.

- state when the plan is reviewed
 - The plan is set to be reviewed annually. Currently the next review will be July 2023
- what training have the staff on site received in order to implement the OMP?
 - All of our staff undergo a range of training which is in line with their job role. For the purposes of this plan the main focus is on the raw dog food production and the staff within.
 - Training to implement this plan is given in tranches and based on the individual's role.
 - Operations Manager and Directors are responsible for the development of this plan and therefore understand the requirement to implement it
 - Supervisory staff (2) will be trained on this plan and given responsibilities alongside their current roles. Standard training in this role includes HACCP for production and by default includes odour management plan. They also undertake Food Hygiene certification
 - Operators. All operators undertake food hygiene certification and HACCP training which by default includes OMP.
- how often are they trained and who delivers the training?
 - Training for all staff starts at Induction and continues from there. Overall staff undertake on average 6 training courses that are certificated along with training that's not certificated such as HACCP and this OMP
 - Training is either provided internally (HACCP, OMP) or by using a third-party provider. For us, that's mainly Avensure Ltd for most soft skills or Nightingale Training for things such as First Aid. We also have third party training for things such as forklift training.,
- any other information you feel is relevant
 - Whilst we appreciate that some of the above information is not directly relevant to the OMP itself, we just wanted to illustrate that we invest large amounts of time and money in training our staff in all aspects of our operation and this OMP is no different

1.3 Relevant sector guidance on which this OMP is based

- Provide titles, sources and publication dates of all guidance referred to when writing this OMP
 - [H4 odour management](https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management)
(<https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management>)

- [Develop a management system \(https://www.gov.uk/guidance/develop-a-management-system-environmental-permits\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits)
- [Pet Food Manufacturing: Process Guidance Note 6/24](#)
- any other information you feel is relevant

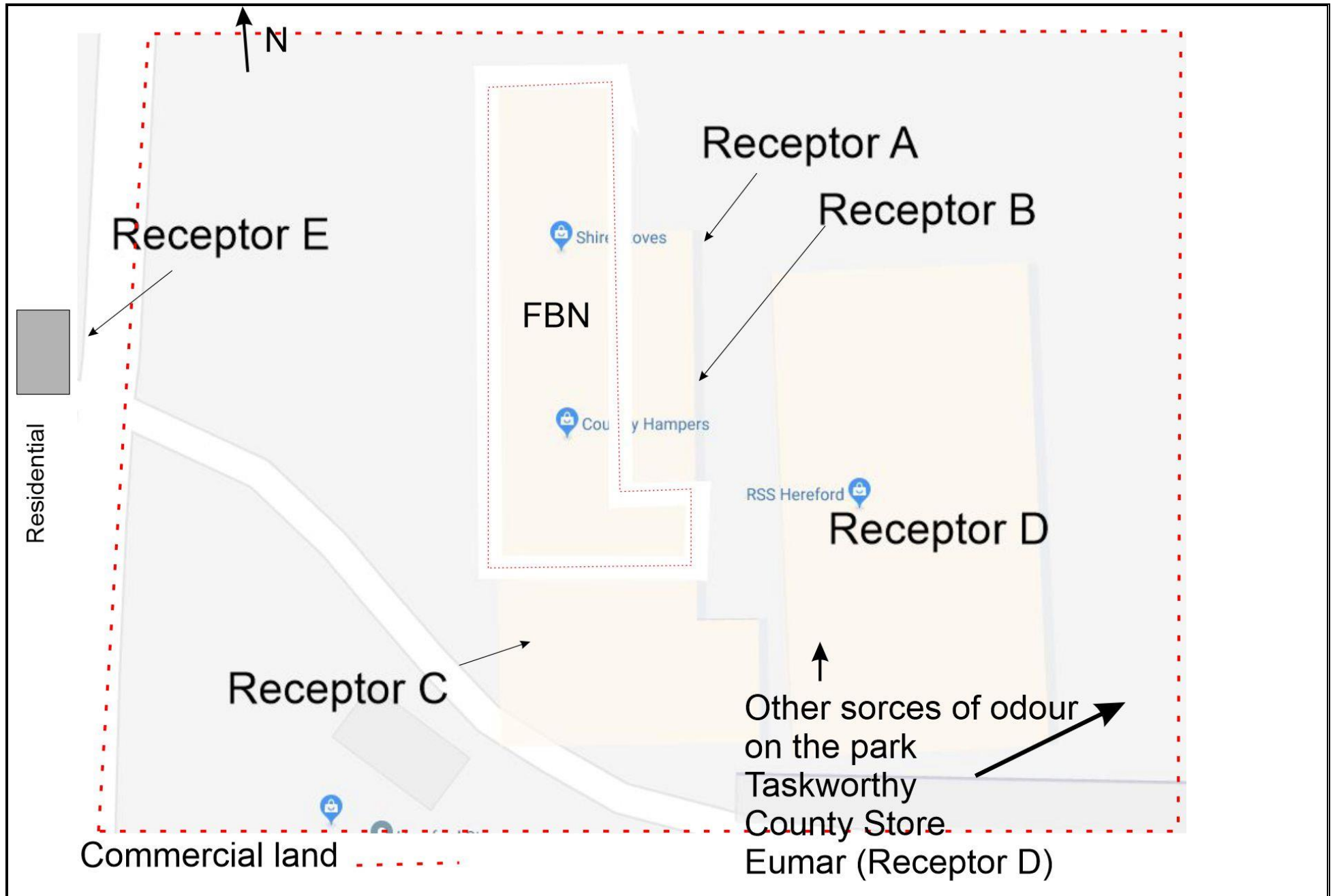
2. Receptors

2.1. Receptor List

Table 2.1. Receptor list

Receptor reference (A, B, C etc. Use to label Fig 2.1)	Land use e.g. house, school, hospital, commercial	Direction from site (North, South, East, West)	Approximate distance to site boundary (m)	Sensitivity to odour Low (e.g. footpath/road) Medium (e.g. industrial / commercial workplace) High (e.g. housing / pub / hotel etc.)
A	Commercial		Next Door	Medium
B	Commercial		Next Door	Low
C	Commercial		Next Door	Medium
D	Commercial		20m	Low
E	Residential		100m	Low

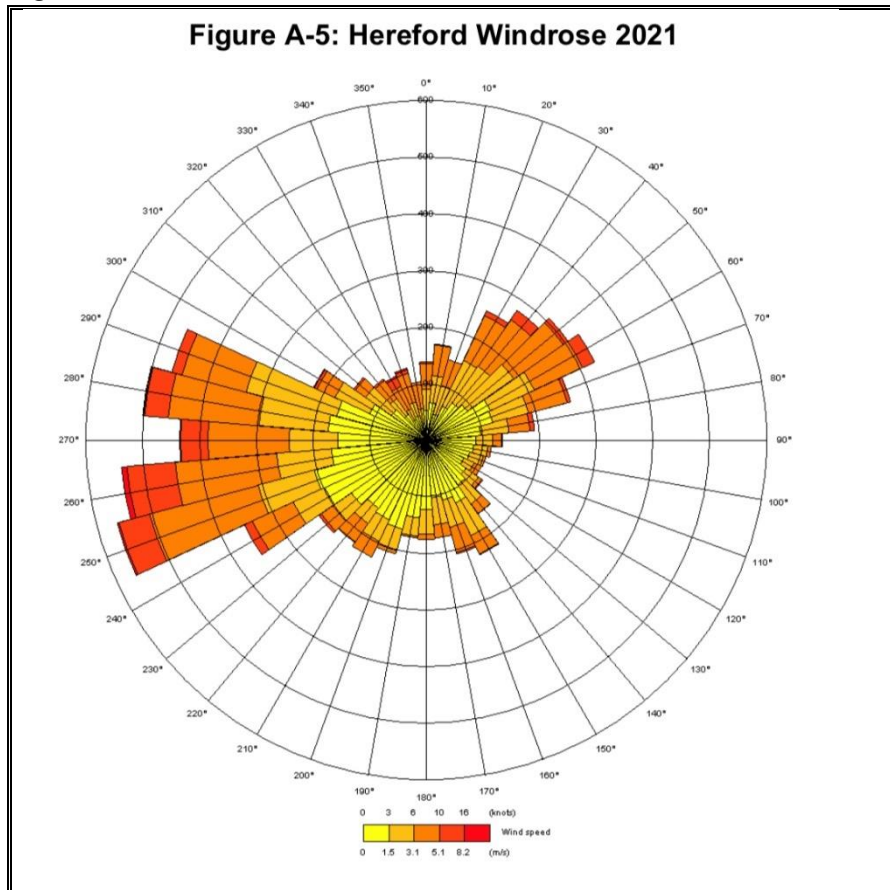
Figure 2.1 **Map of site location** and receptors





2.2. Wind rose and source of weather data

Figure 2.2. - Wind rose



3. Sources of odour and site processes

[Guidance starts – read and delete

Using the sections below, describe what the site does and be specific about the materials delivered to site and the site activities e.g. delivery procedures, treatment processes / storage locations / storage quantities / storage duration etc. Support this with a simple site layout plan (Figure 3.3) to show how the site is laid out and which parts are relevant in terms of odorous processes and odour emission locations. This information may also be held in other management plans and therefore, the relevant information needs to be copied and detailed below.

Guidance ends]

3.1 Odorous materials entering and leaving site

- how are deliveries made to the site e.g. road/rail/canal?
 - All deliveries are made by road transport. On arrival all deliveries are processed within the remit of our HACCP. Once accepted material goes to either a freezer or to the warehouse for storage at which point its booked in and put away
- at what frequency does the site receive deliveries?
 - Deliveries take place at ad-hoc times but typically 2 to 3 times each week
- what kind of containers is the material received in?
 - Deliveries are received frozen at minimum -18 degrees. Material is boxed and wrapped . For all none frozen deliveries thses are always boxed and palletted
- are the vehicles sealed or covered?
 - Vehicles doing deliveries are sealed and are frozen transport normally operating at -18 to -25 degrees for food deliveries. For dried material the vehicle is still covered and is often a curtain sider type HGV
- are customers / vehicle drivers provided with any special instructions about odorous loads?
 - Not applicable, we don't have odorous loads and should one arrive it wont pass inspection. We have a strict critical control

point for incoming material as part of our HACCP and odorous loads will be rejected

- what protocol is in place for unacceptable materials being delivered? If you have a Waste Rejection Protocol this can be cross-referenced
 - As part of our HACCP protocol our first critical control point is the arrival and acceptance of material. This process includes visual inspection, temperature check, vehicle inspection and within this is a smell check. Any material failing any point in the process will be rejected and not enter the site
- any other information you feel is relevant
 - All incoming material is considered Category 3 material which means (within the meat sector) its fit for human consumption but not necessarily for human consumption. Our finished product relies on our material being super fresh and of high quality
 - Items being delivered are
 - Meat (Chicken, duck, turkey, lamb, beef)
 - Fruits and vegetables (spinach, broccoli, courgette, pumpkin, butternut, mango, blueberries, apple, apricot)
 - Dried chews and treats. (multiple proteins)
 - Supplements (salmon oil, hemp seed oil, spirulina, coconut oil, manuka honey, kelp etc)
 - Botanicals) Organic flax seed, sunflower seed, pumpkin seed, goji berries, chia seeds, coconut)

3.2 Odorous materials

Table 3.2 Odorous materials

Odorous and potentially odorous material (any solid, liquid or gas)	Odour potential High Risk / Medium Risk / Low Risk	Maximum quantity on site at any given day (tonnes per day or litres per day)	Maximum time held on site (hours or days)	Location of odorous materials on site	Additional comments
Raw material meat arrival	Low	10 tonnes	7 to 10 days	Freezers	
Raw Material Fruits and Vegetables	low	1 ton per week	7 to 10 days	Freezers	
Storage of meat	low	10 tonnes	7 to 10 days	Freezers	
Storage of fruit and vegetables	Low	1 ton per week	7 to 10 days	Freezers	
Mincing of meat	Low	15 tonnes per week	7 to 10 Days	Cold room	Processed frozen, not defrosted
Adding fruits and vegetables	Low	1 ton per week	7 to 10 days	Cold room	Processed frozen, not defrosted
Packing raw dog food	Low	15 tonnes per week	7 to 10 days	Cold room / packing area	Packaged frozen.
Storage of finish goods	Low	15 tonnes per week	7 to 10 days	Freezer	Frozen to -20

Storage of waste material	Low	150kg per week	10 to 14 days	Cold room or freezer	Always temperature controlled
Arrival of dried treats and chews / ambient material/products	Low	500kg per week	Up to 21 days	Warehouse / ambient	
Storage of dried treats and chews / ambient material/products	Low	2000kg at any one time	Up to 21 days	Warehouse /ambient	
Pick/pack of dried treats and chews / ambient material/products	Low	200kg per day	n/a	Warehouse / ambient	
dispatch of dried treats and chews / ambient material/products	Low	200kg per day	N/a	Warehouse ambient	
Waste disposal of dried treats and chews / ambient material/products	Low	Up to 20kg per week	Up to 20kg	Warehouse / ambient	

3.3 Overview of odorous processes and emissions

Provide a description (whether text / diagrams or tables) of the site layout and the processes carried out including the information in the bullet points below as a minimum. Use Figure 3.3 as a guide to show the site infrastructure relevant to any odorous processes carried out and the odour emission locations on your site e.g.

In the building we conduct 2 main activities.

1. The production of raw dog food

2. The picking, packing and distribution of natural dried treats and chews of dogs.

Raw food production

The process of raw food productions follows this simple process

1. Raw material arrives in frozen form by the pallet. Each pallet is delivered at between -18 and -25 degrees.
2. On arrival and as part of our HACCP the delivery is checked for quality, condition and accuracy. This is a Critical Control Point for us and therefore the first main hurdle for material to overcome. Failure in any aspect of this CCP results in material being rejected.
3. From arrival the material is stored in a freezer until processing.
4. For processing the material remains frozen and is minced in a cold room which provide a temperature control environment in which to work.
5. After mincing the material is bagged straight away, boxed and placed in the freezer.
6. The product will remain in the freezer until dispatch at which point is it boxes and shipped the same day.

Throughout the production process we constantly check for quality, part of that is detecting any odour. If the material is judged as failing quality control, is it assigned to waste. Waste is temperature controlled and held until our licenced waste contractor collects which is every couple of weeks. We have a full HACCP Process that we follow for production which include compliance with the food safety and hygiene regulations. A revised edition of that HACCP for raw in included as an appendix to this document and it has been changed to indicate the odour control points within that process.

The picking, packing and distribution of natural dried treats and chews

The process for the above activity is equally straightforward. Rather than a HACCP for this process we operate what is termed as “Good Husbandry”. This involve ensuring that simple and basic processes are followed from ensure quality control on arrival through to weights and measures and a pest control programme.

The process is as follows

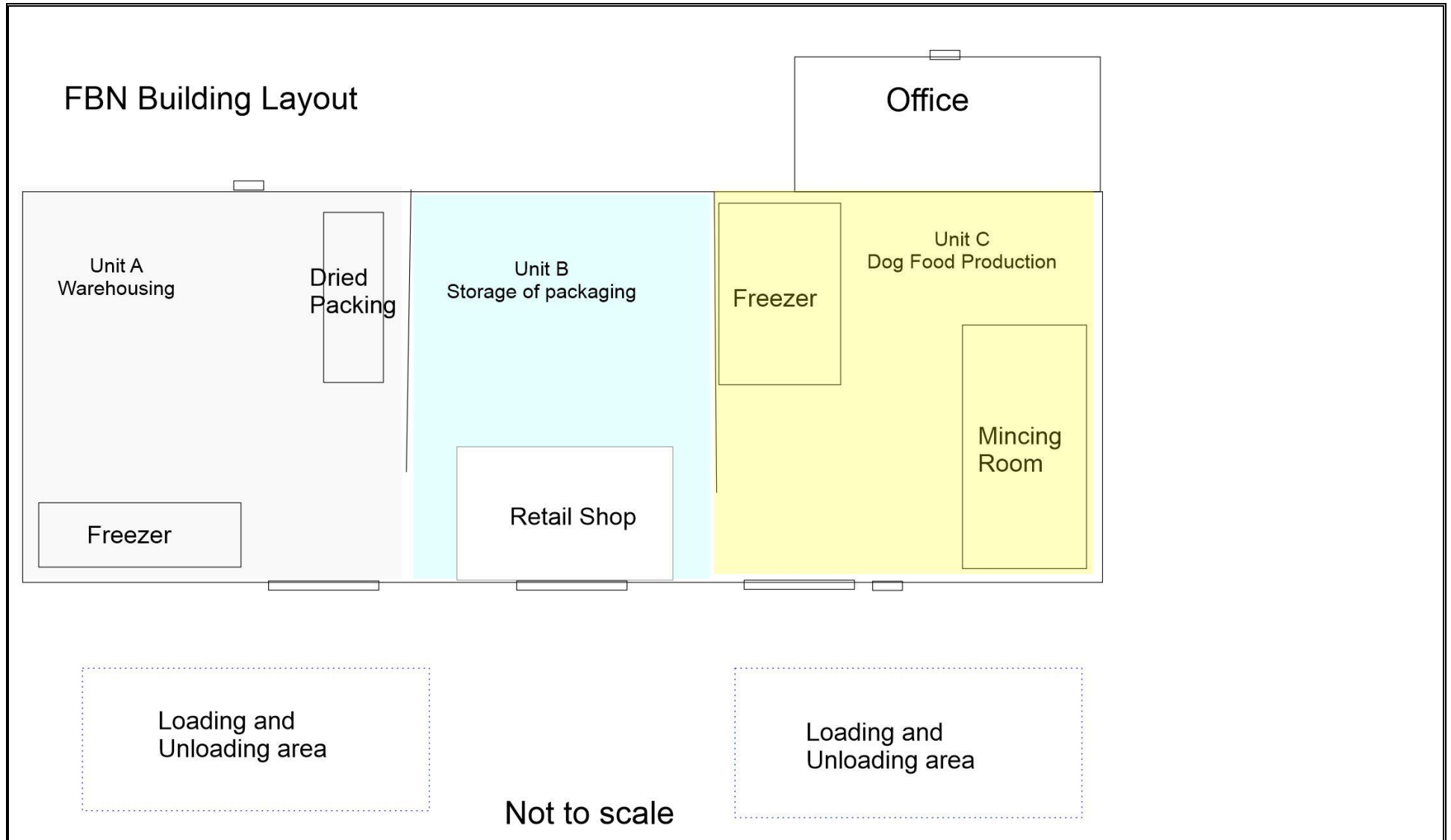
1. Products arrive. These are ambient products box and bagged
2. Product is checked and inspected, anything not meeting the requirement is rejected
3. Product is booked in and placed in the warehouse for storage
4. Product is picked and pack at some point once an order is received.
5. Product is packed and shipped in bags and boxes via national carriers

Throughout the production process we constantly check for quality, part of that is detecting any odour. If the material is judged as failing quality control, is it assigned to waste. Our waste collection take place twice per week

- name and type of buildings,
 - Unit 1A, Unit 1B. Unit 1C.
 - Warehousing units with small associated office space to Unit 1C
- if applicable, describe the building air ventilation system
 - Not applicable
- loading and unloading areas,
 - Outside space in front of unit 1A and 1C
- storage areas,
 - Freezers for frozen material
 - Dry warehousing for ambient material
- windrows, (if composting site),
 - n/a
- processing areas,

- Unit 1C is used for processing material
- which activities have the most odour potential e.g. a food and drink site may receive low to medium material delivered to site but processing (cooking) will mean this becomes high risk,
 - Processes of raw material is the product of dog food has the most potential
- fixed plant and layout of equipment, e.g. trommel, conveyor etc,
 - Freezers (see diagram)
 - Processing room (see diagram)
- locations of mobile plant,
 - n/a
- odorous emission points,
 - Not applicable and doesn't form part of our process. Odour is based on potential odour rather than as a result of the process, we don't have air extraction or stacks.
- risk associated with activity e.g. high medium or low,
 - Very low
- any other information you feel is relevant
 - Our process in creating raw dog food is very simple. We receive material frozen, store it frozen, process it (mince) frozen and pack it frozen and distribute it frozen. At no point do we defrost anything therefore unless due to an incident and material is allowed to defrost our odour causing potential is very low. Even waste material is kept temperature controlled.

Figure 3.3 – Site plan showing odorous process locations / odorous emissions / storage



4. Control measures and process monitoring

4.1 Appropriate measures / BAT

Table 4.1 Monitoring procedures for appropriate measures/ BAT

Odorous and potentially odorous process / material	Control measures (Appropriate Measure / BAT)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level	Action taken if outside optimum process parameters
Off loading of raw material	To be accepted or rejected in line with HACCP	Every time	Temperature, condition, odour, cleanliness, accuracy	Failure in any item in column 4	Rejection of material
Storage of raw material (meat, fruits and vegetables)	To be stored at -18 as a minimum	Constant	Constant. - with alarms for when temperature of freezer falls below parameters	Temperature warmer than -10 degrees	Ensure freezer working as expected and instigate repair or service as required.
Mincing of material	To be conducted with frozen material in cold room environment ensuring quality of	Constant	Colour, odour, temperature checks	Failure in any part will render material to waste	No action needed unless material failing at which point waste which is stored frozen or chilled until collection

	material prior to mincing				
Packaging of product	Using frozen material freshly minced and placed in to packaging. Checking colour, odour, temperature	Constant	Colour, odour, temperature checks	Failure in any part will render material to waste	No action needed unless material failing at which point waste which is stored frozen or chilled until collection
Storage of final product	To be stored at -18 as a minimum	Constant	Constant. - with alarms for when temperature of freezer falls below parameters	Temperature warmer than -10 degrees	Ensure freezer working as expected and instigate repair or service as required.
Dispatch of final product	Taken from storage and packaged for transport. Ensure temperature at point of packing	Constant	Ensure temperature at point of packing.	-18 as a minimum	Product to be put back in freezer to harden up or if temperature too high them product goes to waste which is either frozen or chilled until collection
Off loading of dried products	Booking in in line with HACCP and quality control. Looking for failure sin quality inc odour	Constant	Ensure product is stored correctly at ambient and regularly check as the product is sold over time	Failure in quality of any sort would render the product to waste	Very rare to fin failure in quality on arrival or ongoing. These are ambience chews and treats
Storage of dried products	Ambient storage in warehouse. Ensure product quality and	Constant	Ensure product is stored correctly at ambient and	Failure in quality of any sort would	Storage of products to be monitored daily in the course of regular duties

	degradation of product whilst in storage		regularly check as the product is sold over time	render the product to waste	
Picking and packing of dried product	Ambient pick and packing of products ready for shipping. Ensure product quality and degradation of product whilst being picked and packed	Constant	Ensure product is stored correctly at ambient and regularly check as the product is sold over time, make final checks prior to final packing	Failure in quality of any sort would render the product to waste	packing of products to be monitored daily in the course of regular duties
Shipping of dried products	Ambient shipping of product to customer	Constant	Final checks of products prior to sealing of box, photo of trade orders to be taken for QA purposes	Failure in quality of any sort would render the product to waste	Shipping of products to be monitored daily in the course of regular duties

5. Odour reporting

5.1 Complaints reporting

In the event of complaints we will respond within 24 hours and conduct the following.

1. Complaints will be logged
2. Environmental Health at Herefordshire Council will be informed with a copy of the completed log
3. Complaints will be investigated
4. Any identified failing will be logged and addressed to prevent the same failure in the future
5. We will report back to the complainant the outcome of the investigation and the action taken. EH at Hereford Council will be copied in on this.
6. We will increase sniff test monitoring for 7 days after the complaint as set out in section 5.4
7. We will ensure that our procedures are in line with our permit and include a review and improvement cycle following a complaint

5.2 Community engagement

Given the low, to very low odour created we don't expect any complaints. Given the lack of complaints then a pro-active engagement plan is considered unwarranted, however, given a complaint we will respond as highlighted in section 5.1 which includes engaging with the local community.

5.3 Pro-active odour monitoring

Each day at approx. 10am and 2pm we will conduct sniff tests at points around the building. These sniff tests will be conducted by staff members who are not involved in the meat or product processing functions and therefore not accustomed to any odour. Each day a log will be kept creating a full calendar log over time.

During the sniff test all and any odours will be logged and describes to the best of our ability. This will include other businesses, farm activity or works being undertaken at the time. This log will be referred to in the event of a complaint and shared with stakeholders.

5.4 Reactive odour monitoring

In addition to tasks set out in section 5.1 in the event of a complaint we will increase sniff test logging to 3 times a day.

6. Abnormal events

Table 6.1 Abnormal events

Abnormal event	Recovery steps
Freezer Break-down/Power Failure	We have 3 freezers' available to us plus a cold room. The likelihood of breakdown of all 3 at the same time is highly unlikely. In this event provided we keep door closed material will remain frozen and then chiller for at least 7 days. This is enough time to arrange emergency freezers to be delivered to site on a temporary basis until freezers can be fixed
Drain blockage	On occasion we suffer a drain blockage. When this happens, we are able to use rods and other equipment to remove the blockage and ensure normal use of the drainage very quickly. During the blockage period some odour can be created but this is internal. We use chemicals and sprayers to suppress any drain odour and the likelihood of any odour leaving the building is low.
Fire	In the event of a fire that has a mission critical impact we have business continuity insurance for up to 12 months. We would therefore implement our business continuity process with the result that odour would be unaffected.

Appendix 1 Odour Management Plan – Control Points Document

This document describes the raw food production HACCP and has been adapted to show odour control points in the HACCP process. Whilst it duplicates much of what's in this OMP its been added for completeness and to illustrate how the product HACCP and OMP work together.