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Mrs J Brindle
Omega Proteins Ltd
Swalesmoor Farm
Swales Moor Road
Halifax
HX3 6UF.

Our Ref:
Your Ref:

5th August 2016

Dear Mrs Brindle

Re: Odour testing at Omega Proteins Ltd, Half Acre Road, Thornton, Bradford
Environmental Permitting (England and Wales) Regulations 2010

I write following your submission of odour emission results from monitoring carried out on 28th June 2016.

In your email accompanying the odour emission results you gave a quick précis of the results and made comparisons and certain conclusions with reference to previous results. In relation to the results and accompanying email my comments are as follows:

Stack- You state that although stack results are higher than last year (9600 ou/m³ compared with 1102 ou/m³) they are comparable to 2015 (8301 ou/m³) and lower than 2013 and 2012(17215 ou/m³ and 13601 ou/m³) You further state that the emission rate is 96960 odour units per second and conclude that this is further evidence that the oxidiser is not a source of offensive odours off site.

In terms of the emission rate, I agree that this year's results would suggest that emissions from the stack would not create an odour impact off site .The ADAS odour modelling undertaken in 2013 showed that when the emission rate from the stack is 100,000 odour units per second, modelling indicates that at the nearest receptors odour concentration will be below 1 ou/m³. This indicates that there will not be an odour impact.

I am, however, concerned at the significant increase in both emission rate and odour concentration when compared with results from 2015.A deterioration in results to the same magnitude next year may well result in off site odour impacts.
Biofilters – In your email you quote the biofilter efficiencies (BF1 97%, BF2 75%, BF3 95%) and state that the result makes biofilter 2 look poor, although the total emission rate and overall performance for all 3 biofilters is similar to last year (61036 odour units per second this year compared with 68236 in 2015)

You further state that the efficiency figure is lower because the inlet concentration was much lower than last year.

The following table of results was contained within the ADAS report entitled "A review and assessment of Odour control measures and regulation at the Omega Proteins plant at Bradford" dated April 2013:

Table 4 Comparison of Predicted Odour Impacts (ou_E/m^3) for Omega & ADAS Modelling Studies at Biofilter Emission Rates of 49,700 ou_E/s

Receptor	Omega's Consultant	ADAS (worst year)	ADAS (average year)
Well Head	1.05	1.675	1.07
Slippershaw Fm	4.09	4.14	3.38
Law Farm	2.75	4.86	4.50

The figures above obtained from results submitted by your consultant and ADAS would indicate that there would be an off-site odour impact where there are combined emissions from biofilters of 49700 odour units per second. It is therefore reasonable to assume that at 61036 odour units per second there will be a greater impact.

In both 2015 and 2016 emissions are significantly higher from biofilter 2 when compared to biofilters 1 and 3, indicating that there are problems with the operation of biofilter 2. I fail to see how it's its poor efficiency rate is related to a lower inlet concentration to the biofilter.

The purpose of annual testing is to provide evidence that odour abatement equipment is working efficiently. Where results show that this is not the case remedial action should be instigated promptly .The Council is still receiving complaints about Omega Proteins Ltd concerning offensive odours beyond the site boundary. Numbers of complaints have risen over the last month.

To ensure that the reduction in efficiency of odour abatement equipment is rectified promptly and effectively, I would like you to provide an action plan providing details of how you propose to address this matter. It is expected that such a plan will show what necessary measures will be put in place to address the reduction in efficiency and that further testing will be carried out within a reasonable timescale to confirm that measures have improved the efficiency of odour abatement equipment.

I request, therefore, that within 14 days of receipt of this letter you provide details, in writing, of how you intend to address the issues raised in this letter in relation to emissions from both the thermal oxidiser and biofilters.

Yours sincerely

Philip Best
Environmental Health Officer