

## Background

Following on from our January 2019 newsletter we would like to provide an update on our regulatory activities.

## Update on Regulation

On 4 March 2019 we conducted a joint visit with Environmental Health Officers from Gedling Borough Council to assess odours in the building and discuss best practice. This was an opportunity to compare odour abatement techniques between regulated sites and to undertake odour assessments. The findings were consistent with the results from our previous audits and our key areas of focus for the year ahead will be the feather processing and raw handling areas.

Further details of this visit can be found within CAR reference 'AP3436DG/0329230' which can be requested via [EMDenquiries@environment-agency.gov.uk](mailto:EMDenquiries@environment-agency.gov.uk)

The Operator has identified a potential source of offensive odour when finished bags are being removed from the building in the feather processing area. To mitigate against the risk from this area, the Operator is to install an airlock door system for the feather processing area which will assist in preventing release of malodour from that part of the operation when the door is opened. The installation of the new door is due to be completed in May/June 2019.

Following a review of raw material handling operations, the Operator has revised trailer delivery movements to streamline the processing of trailers being received at site. Systems have been implemented to assist with odour control with regards to reducing raw material vehicle movements. These include the introduction of a "zoning system" which will be used to prioritise loads dependent on travel time, weather temperature etc. As a result, loads which are potentially the most odorous will be prioritised for processing.

The site has also been undertaking an odour abatement assessment on all internal processes. This has involved assessing the suitability of internal abatement measures, rebalancing of extraction systems, and the addition of monitoring points as well as cleaning internal ductwork to reduce loading on the bio-filter and/or the Thermal Oxidiser.

The Operator has produced a revised Odour Management Plan that documents the new and revised procedures they will be operating to as prescribed by their environmental permit. This is an important revision which will form the basis of our regulatory compliance work relating to odour control.

The site are providing updates on site activities on their company website which can be found at the following address - <https://jqpears.com/community-liaison/>

Our officers will be undertaking a series of targeted audits over the next year and shall be carrying out proactive and targeted odour assessments as part of our ongoing regulation of the site. We will carry out odour assessments when we believe that an incident has, or is likely to occur (based on reports and weather conditions etc.). Our assessments will include full odour checks in and around nearby residential properties, and investigations of the effectiveness of odour abatement from the factory, including the factory doors, at that time.

## Future Regulation

We acknowledge that the site is capable of producing offensive odours. We continue to focus our efforts on the areas of the site which have the greatest potential to produce odour. This is to ensure offensive odours are not transmitted beyond the site boundary. It is the operator's responsibility to take all appropriate measures to ensure that offensive odours are not transmitted off site.

Providing that appropriate measures are effective, we expect that the operator will be compliant with their permit and fall within normal ongoing regulation. If this is not deemed to be the case then appropriate action will be taken.

It should be recognised that due to the nature of the operation there is still the potential for non-offensive odours to be generated and these may be experienced off-site. Such odours may not constitute a breach of permit.

## Review of complaints received May 2018 – April 2019

We continue to monitor complaints carefully. The 'spike' of complaints seen below for February is restricted to a localised area around the site and is receiving targeted intervention from us.

Month 2018-9*	No. of complaints
May	25
June	72
July	180
August	40
September	7
October	1
November	4
December	8
January 2019	9
February	16
March	11
April	4

\*For previous months data to May 2018 - please see prior newsletters

## Public Health England

Monitoring for Hydrogen Sulphide has been undertaken, and the results have been passed to Public Health England (PHE) for review, who have the following comments.

*"PHE have reviewed the monitoring data submitted by J G peers for H2S and conclude that the Air Quality Guideline\* for hydrogen sulphide is not being exceeded by the site. Therefore, based on the data provided, there is no evidence to indicate a risk to public health.*

*\*(Air Quality Guidelines for Europe. World Health Organization Regional Office for Europe, Copenhagen WHO Regional Publications, European Series, No. 91, Second Edition, 2000). "*

customer service line  
03708 506 506

incident hotline  
0800 80 70 60

floodline  
0345 988 1188

[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

We will be undertaking our own monitoring in the summer and shall pass the data to PHE for review. We will share the results of this review with the community.

### Community Liaison & Next Steps

We met with representatives of the Parish Council on 17 April 2019 to provide an early update on the site improvements described in this letter and to talk through our regulatory and enforcement powers and the processes associated with them.

We will issue a further update via newsletter and are planning to attend the June Parish Council meeting.

### Reporting of incidents

We continue to encourage that reports are first made directly to J G Pears using the site contact details below before reporting it to our incident hotline. This has the benefit of allowing the company to be made aware of and investigate incidents without delay.

We always use the information supplied to us via our incident hotline to gain a better understanding of the odour characterisation and potential sources on site.

Any health concerns should be reported to Public Health England via the email address below.

We will be using our newsletter and visits to Parish Council meetings to inform residents of the actions being taken at the site rather than providing individual feedback to emails or incident reports. This allows our officers to focus their efforts on site regulation.

### Contacts

Complaints:

**J G Pears** can be called directly on telephone number 01636 821218 or on email at [lmcorrespondence@jgpears.com](mailto:lmcorrespondence@jgpears.com)

We would also encourage residents to use our free phone **24 hour incident hotline** number to report any odour incidents arising from the J G Pears site on 0800 80 70 60 once the issue has been reported to J G Pears.

**Public Health England** [crcenottingham@phe.gov.uk](mailto:crcenottingham@phe.gov.uk)

**Thank you for your continued interest in J G Pears and in protecting your local environment.**

\*Note: Within the operational site boundary of J G Pears the activities are regulated by two separate permits. The rendering plant is operated by J G Pears (Newark) Ltd Permit Reference AP3436DG and the CHP Plant and associated MBM storage is operated by J G Pears (O&M) Ltd Permit Reference MP3235CC.

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