



OAKBURN ODOUR MANAGEMENT PLAN

Prepared By:	Sherilee Stewart	Oakburn Admin and Compliance	Date: 12/02/2025
Checked By:	Grant White	National Environment & Sustainability Manager	Date: 21/02/2025
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Template No:	BAI-TMP-016-NAT	Issue No: 1	Issue Date: 03/01/2023

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Introduction

This Odour Management Plan (OMP) was initially prepared by SLR Consulting Pty Ltd (SLR) in accordance with Condition B12 of Development Consent SSD-9394 for Baiada Oakburn in

It has since been amended by site personnel as part of the annual reviews, or triggers in relation to SSD9394 Conditions C11-13, details of which are included in the amendment history.

This OMP is associated with the existing Oakburn Facility which consists of a Protein Recovery plant (Rendering) and the construction of the Oakburn Integrated Poultry Processing Facility. The OMP should be read in conjunction with the Oakburn - OEMP (Operational Environmental Management Plan).

Rendering Operations

Raw product consisting of offal, feathers, blood and carcasses is brought to site in sealed trucks and tipped into raw material bins. The bins are then hydraulically closed and sealed. Raw product is rendered using steam, drying, and grinding to produce finished products, meal and tallow. Meal is stored in sealed bins inside the facility, and tallow in sealed tanks at the rear of the facility. The finished products are loaded to trucks for removal from site. Air is drawn from the raw materials bins and rendering plant and ducted to a bio-filter to reduce odours before being released to the environment.

Construction of Integrated Facility

The construction of the Integrated facility commenced in May 2024 and is ongoing. The Construction Environmental Management Plan (CEMP) documents the requirements associated with construction being completed under the control of Richard Crookes construction.

Purpose

To ensure that all possible odour emitting sources and site operation activities are managed in a manner that will minimise the impact at receptors.

Objectives

The objectives of the OMP are to:

- Set out responsibilities of Facility staff and contractors.
- Identify the potential sources of odour on the site.
- Identify off-site sensitive receptors with the potential to be impacted by odours from the Facility.
- Assess the risk of off-site odour impacts from the Facility.
- Determine the appropriate mitigation and management measures needed to control the risks.
- Establish key performance indicators
- Establish an appropriate monitoring method and schedule
- Determine appropriate responses and contingency measures when issues arise.
- Formalise the procedure for handling odour complaints.

References / Records

Ref No	Document Title	Document No
1	WHS&E Policy	IMS-Policy-1000-NAT
2	All relevant Development Approvals and Associated EIS and SEE	
3	Protection of Environment Act 1997	
4	Environment Protection Licence 7566	
5	Oakburn EMS Hub	Located on Oakburn Server

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6	Environmental Incidents and Complaints	EMS-F-007-NAT EMS-STD-009-NAT
7	Baiada Poultry Proposed Poultry Processing Facility Odour Impact Assessment (January 2019)	

Definitions

Term	Description
Bio-Filter	Pollution control technique using a bioreactor containing living material to capture and biologically degrade pollutants and odour.
SBR	Sequencing Batch Reactor: A process where activated sludge is used to reduce organic matter within the effluent.
WWTP	Waste water Treatment plant.

Responsibilities

Position	Responsibilities
Site Manager	Supplying suitable resources, coordinating, facilitating and implementing this OMP.
Production Manager/Supervisors	Implementing and complying with this procedure in their relevant work areas.
All Staff	Complying with this procedure in their relevant work areas
Contractors	Providing a service in line with this procedure in their relevant work areas.

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1. Potential Sources of Odour

Potential sources of odour on the site include:

- delivery area (mainly serviced by bio-filter before release to air)
- rendering plant (serviced by bio-filter before release to air)
- finished product storage, handling/dispatch
- bio-filter
- waste material
- wastewater treatment (covered anaerobic lagoon (CAL) including biogas venting and flare)
- gas leakage (and associated odorant)
- to a lesser degree, diesel vehicle exhaust fumes.

2. Site Baseline Data

The sites history with regards to odour has been patchy with a number of issues causing odour complaints over time. The current rendering facility also started with odour release issues which have been corrected over the last 5 years. See Figure 1 below – Site Baseline Odour Complaints during the 2015-2020 period vs the 2021-2025 periods. This figure shows the development can exist with zero complaints relating to odour emissions at the site Boundary and this remains the site expectation.

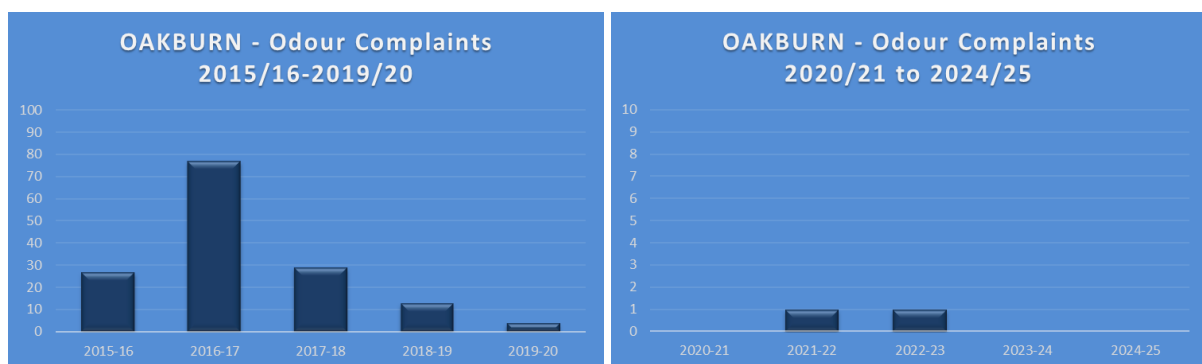


Figure 1: Site Odour Complaints

3. Location and Nearby Sensitive Receptors

The land surrounding the Facility is rural, generally flat and includes facilities performing beef processing, lamb processing, poultry farming and flour milling (Figure 1).

The nearest sensitive receptors include Oakburn Park Raceway and dwellings along Wallamore Road and Bowlers Lane.

Nearby is Tamworth Regional Livestock Exchange (TRLX), Tamworth Regional Airport and a cemetery-crematorium.

Approximately 2.5 km east is Westdale Wastewater Treatment Plant.



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SLR	2 Lincoln Street Level 10 Sydney NSW 1500 P +61 2 9427 8100 F +61 2 9427 8000 www.slrcorp.com.au	Project Number: 610-30360 Location: Tamworth, NSW Other Information: Projection: GDA1984 MGA Zone 56 Date: 11/05/2021	Balade Pty Ltd Oakburn Odour Management Plan Site Location
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4. Wind Conditions

When assessing potential odour impacts, the meteorological conditions of interest are the proportion of low wind speeds and occurrence of stable atmospheric conditions. This is because these conditions result in reduced dilution of emissions.

The greatest risk of poor odour dispersal, and therefore odour impacts, tends to occur on cool calm nights when the temperature inversions block vertical dispersion.

Odour impacts are also very dependent on wind direction and wind speed relative to a sensitive receptor location. When wind is blowing in the direction of sensitive receptors the impacts will be greater.

The nearest available meteorological monitoring station operated by the Bureau of Meteorology (BOM) is the Tamworth Airport automatic weather station (AWS) (station number 055325), located approximately 1km south-south-west of the Facility.

Annual and seasonal wind roses for Tamworth Airport (2020) are provided in Figure 2 indicating the prevailing wind directions. In general, wind conditions will likely disperse any odour emissions to the northwest, towards Oakburn Park Raceway or to the southeast towards the TRLX.

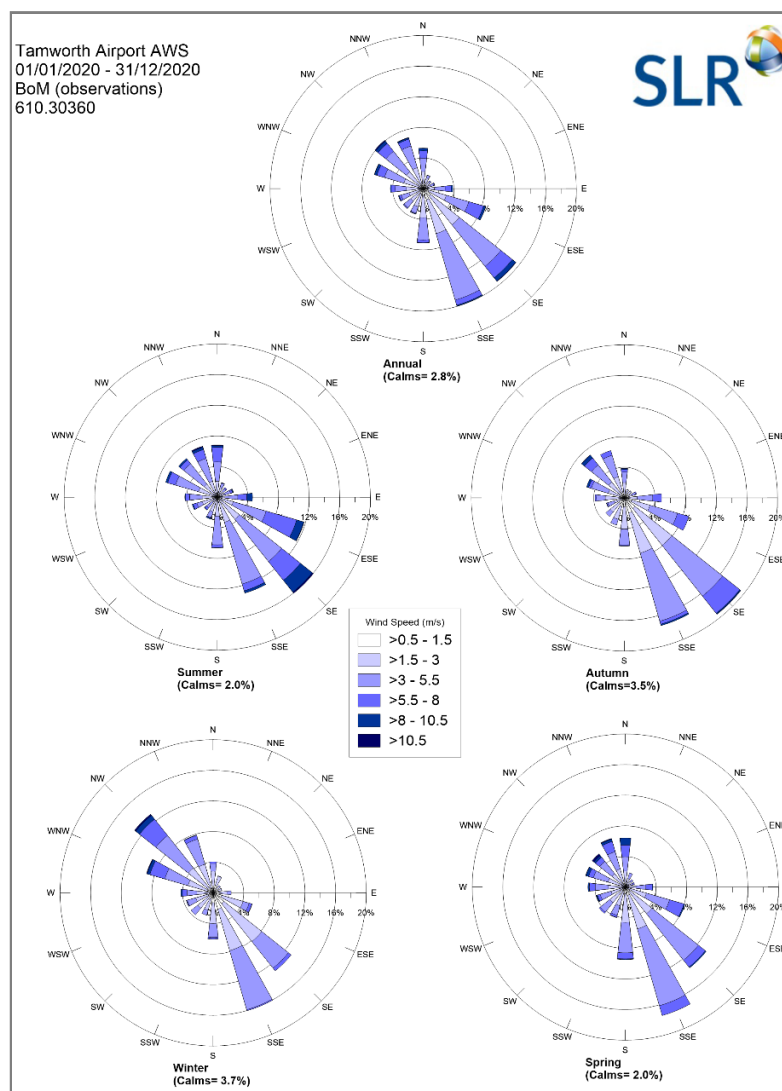


Figure 2 – Prevailing Wind Conditions

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5. Odour Risk Assessment

The risk assessment included below was assessed using risk matrix shown in Appendix No1.

Source	Description	Mitigation and Management	Odour Risk Rating
Raw product delivery	Raw product (viscera, feathers, heads, feet, bones, skin and blood) is to site in trucks and tipped into raw material bins. Raw product is potentially odorous.	Mitigation: Raw product is brought to site in sealed trucks and tipped into raw material bins which are then hydraulically closed and sealed. Air is drawn from the raw material bins and ducted to the bio-filters. Fresh raw product is not particularly odorous therefore there is a focus on maintaining processing of fresh product (refer Product receival management below). Spill management: In the unusual event that raw product is spilt outside of the raw materials receival area the spill is to be attended to immediately by following the National Spill Response procedure and an Incident Report completed. Product receival management: Material for processing must be received in a fresh state as this will assist the quality of product as well as reducing risk for odours to occur. The condition of the product received is documented for each load on the raw material receival form. Where issues are found the dispatch site will be contacted and CAR (Corrective Action Request) actioned for correction and preventative actions. For any reason the processing plant is aware of an issue affecting the freshness of the product to be delivered, they must contact Oakburn Site Manager to discuss options of accepting material or disposing to landfill. Breakdown management: In the event of a breakdown or issue which causes the plant to cease production, product will be transported to an alternate rendering facility. Landfill is also an option which would require notification to Tamworth Regional Council. Farm elevated mortality management: Where conditions have caused a large number of mortalities at the farms, every effort is made to communicate this to Oakburn and ensure that such material arrives as fresh as possible at the site.	Minor / Occasional (1)
Rendering plant	Raw product is cooked and dried and then milled to produce Poultry Meal, Feather Meal and Blood Meal. Poultry Tallow is produced as part of the process. The raw product and processing are potentially odorous.	Mitigation: Point source extraction on the processing equipment is passed through ducting to the Bio-Filters. Steam from the process plant machinery is directed to the condensers / evaporators. The non-condensable gases are ducted to the Bio-Filters. The condensate is directed to the wet wells, which are ducted to the biofilters. Fugitive odour management: Drains should be kept covered within the processing area and rubber matting is to be placed over all liquid drainage areas and wet wells outside the plant to further prevent stray odours from escaping. Breakdown and incident management: Breakdowns have the potential to exacerbate raw material decomposition and cause odour. Any such event which has the potential to cause odour impacts MUST be communicated to Environmental Management and/or Senior Management. In the event of a breakdown causing raw material to be captured within the raw material bins, a waste contractor such as Transpacific will be contacted to remove and dispose of decomposed material. Any incident which causes an odour issue should be reported as per the Environmental Incidents & Complaints Handling & Recording System	Minor / Occasional (1)

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Finished product storage, handling and dispatch	Finished product is stored in the facility and in external tanks at the rear of the Facility. It is dispatched to customers in bulk vehicles, tankers or bulker bags.	<u>Engineering mitigation:</u> Meal is stored in sealed bins inside the facility and tallow is stored in sealed external bunded tanks at the rear of the facility. <u>Product handling management:</u> All meal loading is performed inside the enclosed Dry Area Load out bays and any spillage will be captured for reprocess, disposal or within the grates in the area leading to the liquid trade waste system. Trucks will be correctly secured before leaving the load out area. No odour is expected from the finished goods areas, however the load out doors are to be kept closed at all times when the area is not being utilised.	Minor / Remote (1)
Bio-filter	Air drawn from various PRP processes are ducted to the bio-filter before being released to air.	<u>Operational management:</u> Pressure readings are to be monitored as this is an indication of when the media needs replacing due to decomposition. Bio-filter operation is monitored and checks documented daily. A dripper system on a timer is used to moisten the media. Bio-filter leachate water is gravity fed into the West Wells for treating through the Waste Water treatment system. <u>Breakdown/maintenance management:</u> Processing Bio-Filters have three cells, each capable of being isolated for maintenance or medium replacement when required. WWTP biofilter will be maintained during down times in the system.	Serious / Occasional (3)
Waste material storage	Organic waste material is likely to emit odour, especially as it decomposes.	<u>Mitigation:</u> All waste, (apart from that generated from the WWTP plant) is stored indoors. Washing and sanitising the general waste bins is only done inside the plant and run off is captured by the trade waste system. Regular and timely removal of waste from site will reduce the risk of waste becoming odorous.	Minor / Remote (1)
Wastewater treatment	Waste water is produced as all materials are cooked and dried, waste water. All water produced prior to the SBR is potentially odorous	<u>Mitigation:</u> All Wet wells and tanks associated with the holding and transferring of waste water are contained (other than the SBR) and alarmed. <u>SBR management:</u> Checks for quality and odour are documented on the Wastewater Treatment Monitoring form, although the SBR is not considered a significant source of odour emission. The weekly site audit also checks and records any issues with odour. The SBR sludge is belted to a bin at the back of the WWTP for regular transporting to landfill by a Contractor. The integrity of these bins are checked through the Weekly Site Audit with any issues to be reported to and acted upon immediately by the Waste transport contractor. <u>Sludge Management:</u> The SBR Sludge does not pose a odour source when it is removed weekly for the site for disposal. Pick up is to be at least weekly.	Minor / Remote (1)
Wastewater Treatment - CAL	CAL Biogas venting odorous in nature	<u>Mitigation:</u> The biogas venting system has been replaced by a flaring system which will burn the gas as a fuel and prevent gas and odour being released to atmosphere. This system install was completed June 2022. Boiler 3 was converted to use biogas generated during 2024. This is the primary use of biogas with the flare being used as a back-up. Vent is now only used as a final safety measure.	Serious / Remote (2)

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Stormwater	Sitting water may become odorous.	<u>Management:</u> Swales and the retention basin are checked during the weekly site audit for pooling, or stagnant water and any odours recorded. Any odour observed will be reported immediately in accordance with Environmental Incidents and Complaints Handling and Recording System.	Minor / Remote (1)
Delivery and dispatch trucks	Diesel exhaust fumes have the potential to be odorous.	The sulphur content of diesel fuel sold in Australia is sufficiently low that odour associated with diesel truck exhaust emissions is considered relatively insignificant.	Minor / Improbable (1)
Gas Storage on site	Gas tanks have added odorant with strong odour	Gas storage is in specifically designed containers with safety devices to prevent release from damage to lines. Odorant systems are checked on a regular basis by the equipment supplier.	Minor / Remote (1)

6. Management of the Bio-Filters

Non-condensable gases from the evaporation system are ducted into one of two open-bed up-flow designed Bio-Filters, with Bio-Filter No.1 servicing the high temperature side and Bio-Filter No.2 servicing the low temperature side of the facility.

Both processing Bio-Filters are identical in size and construction, which have been designed for airflows of 30,000 m³/hr. Each Bio-Filter has a media area of 160 m² giving a bed residence time of 38 seconds.

The airstream is humidified prior to bio-filtration using an in duct ultrasonic spray system. The sprays are checked and cleaned in accordance with the manufacture's requirements. There are four nozzles on each duct which require air pressure. The sprays are located where the duct exits the plant to maximize the contact time with the air stream. This contact time is equivalent to raising the relative humidity (RH) of the air from 20% to 100%.

Pressure readings are to be monitored as this is an indication of when the media needs replacing due to decomposition.

7. Management of Odour and the Waste Water Treatment System

For additional detail please refer to the Liquid waste section of the OEMP relating to management of liquid waste and contingencies.

8. Key Performance Indicators

The key performance indicators of this OMP are as follows:

- a) No offensive odour beyond the site boundary.
- b) No loss of amenity – no community complaints related to odour.

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9. Monitoring

The odour monitoring/inspection requirements of this OMP are tabled below.

Requirement	
Parameters	Date and time of monitoring Description of monitoring location Weather conditions (wind speed and direction – Tamworth AWS) Odour intensity, duration, offensiveness, and potential source
Locations	Facility operations perimeter Bio-filter WWTP Downwind site perimeter
Frequency	Daily and with greater frequency if warranted (e.g. if complaints have been received)
Method	Monitoring will be conducted in general accordance with standard VDI 3940-3: 2010 ' <i>Measurement of Odour Impact by Field Inspection – Determination of odour Intensity and hedonic odour tone</i> '. At each monitoring location odour intensity will be recorded as follows: If no odour is perceptible, the intensity will be recorded as 0. If odour is detected but there is some doubt as to whether an odour is actually present, then the intensity will be recorded as 1 (very faint). If odour is detected but cannot be described using precise words or terms, then intensity will be recorded as 2 (faint). If odour is detected and the odour character is recognisable and attributable to the Facility, the intensity will be recorded as at least 3 (distinct). If the odour character is easily recognisable then the intensity will be recorded as 4 (strong). If the odour is bearable but considered offensive, the intensity will be recorded as 5 (very strong). If the odour is considered offensive and, for example, an instinctive reaction is to reduce personal exposure to the odour, then the intensity will be recorded as 6 (extremely strong). Daily documented completion of biofilter monitoring. Daily documented checks on raw material received.
QA/QC	Nominated monitoring staff to be tested for suitability (receive screening/training by olfactometry). Staff exposed to odorous process areas of the Facility are likely to be desensitised to the process odours, therefore nominated monitoring staff should not be exposed to odorous process areas as part of their normal duties (e.g. office-based roles).
Demonstrate Compliance	No abnormal odour detected from Facility operations, Bio-filter or WWTP. No offensive odour detected at downwind site perimeter
Reporting	Daily results incorporated into weekly site environmental audit.

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10. Corrective Actions

Where odour is detected on site the below flow chart (Figure 3) is to be followed to ensure proactive actions are taken towards all odour noted on site.

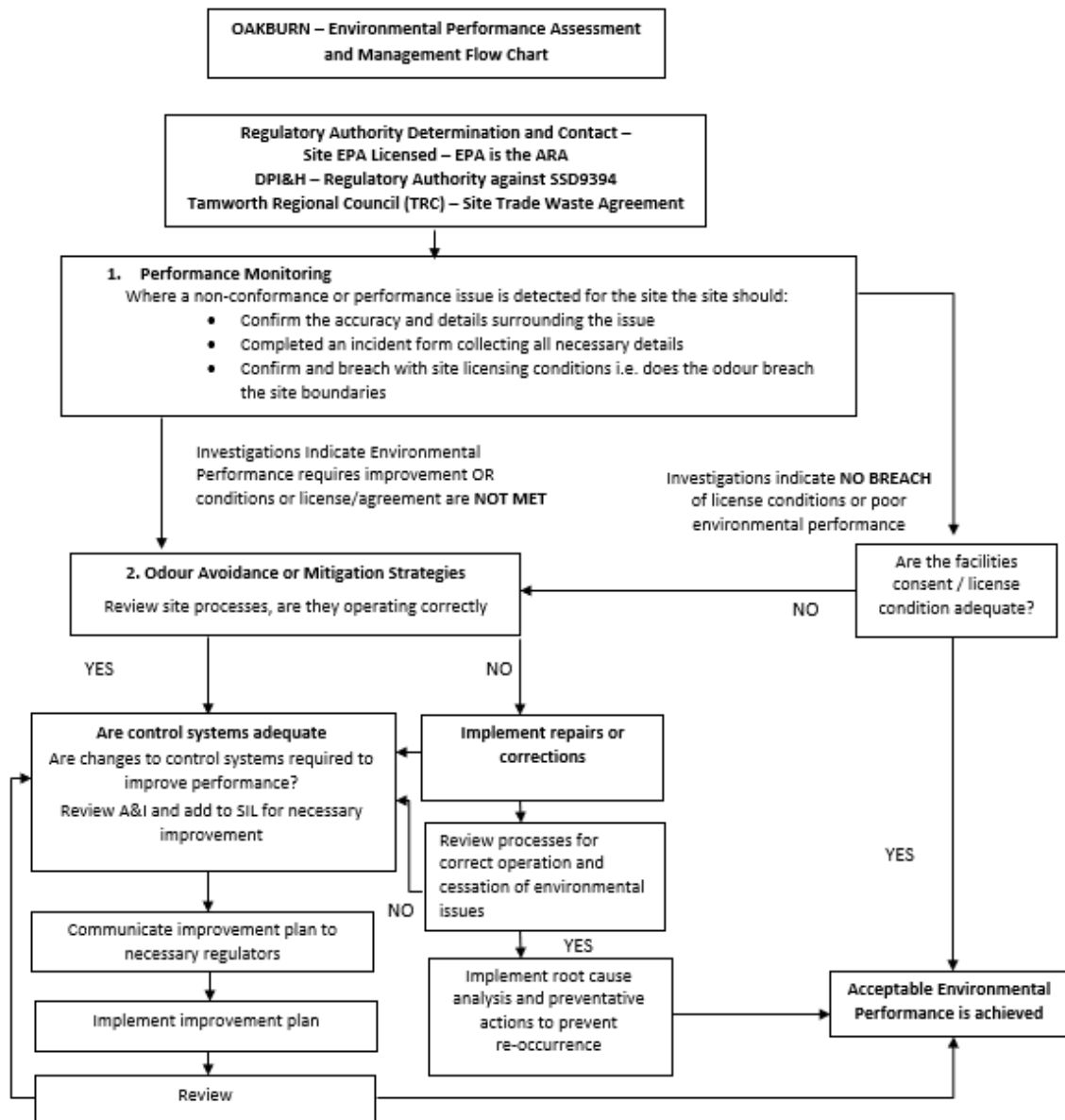


Figure 3 Corrective Action Flow Chart

11. Biofilter monitoring

In the event that the bio-filters are suspected to be the source of abnormal odour emission, odour emission monitoring of the bio-filters will be conducted in accordance with Australian Standard AS 4323.3 by a suitably qualified person(s). Odour testing of the inlet air stream and filter bed emissions will be conducted to assess the odour control efficiency of the bio-filter system (expressed as a percentage). Where the control efficiency has fallen below the design specification, corrective actions

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will be taken to rectify.

12. Verification

- Weekly site audits.
- Bi-monthly management reviews.
- Six monthly internal/external audits

13. Compliance Reporting

As part of the Annual compliance report prepared in accordance with *SSD9394 PART Environmental management, reporting and auditing, Condition C18* the following detail should be included to demonstrate environmental performance for the site;

- Any odour complaints from beyond the site boundary
- Any odour reports that were commissioned
- Any site incidents that could cause odour to be generated at the site boundary.

In accordance with *SSD9394 PART Environmental management, reporting and auditing, Condition C14* the site must also notify via the major projects website immediately they become aware of an incident and also within 7 days of becoming aware of a non-compliance.

The development should operate in accordance with *SSD9394 PART B Specific Environmental Conditions Condition B8 and B9* which requires that the site should not cause or permit any offensive odour beyond the boundary of the site and maintain the premises to minimise and prevent emission of air pollution (including odour) contradiction of these conditions would trigger a reportable incident or non-conformance.

14. Complaints Management Procedure

Complaints/Incidents will be reported internally as per the Environmental Incidents and Complaints Handling system. Forms and Standards as referenced in the references and records are available on "ELO" our Document control Management system. Completed records are located in the Incidents and Complaints Register within the Oakburn EMS Hub. There is a hyperlink on the register for the completed incident report form. The information collected for internal reporting will be used to complete the external compliance reporting procedures if triggered.

15. OMP Updates

This OMP is a live document that will be reviewed upon on a bi-annual basis (as a minimum) or as triggered by conditions C11-13 SSD9394, to ensure that it remains relevant to site operations and to determine whether improvements can be implemented.

As a matter of course, the plan will be reviewed should the following occur:

- Changes to consent conditions
- Significant changes to plant operational practices
- Substantiated odour complaint
- Occurrence of significant odour emission (identified through site inspections).

16. Amendment History

- **July 2019** to include requirements relating to Environmental Incidents and Complaints from the 2019 Independent Environmental Audit.
- **May 2021** to include requirements of Condition B12 of Development Consent SSD-9394.
- **March 2022** to include items highlighted in the 2021 IEA as opportunities for improvement and the inclusion of compliance reporting requirements.
- **August 2022** to include improvements requested by DPE in email 16.05.22.

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- **September 2023** to remove references to WWTP Biofilter which has been decommissioned with the old WWTP. Correction to location of Tamworth Airport AWS.
- **February 2025** Review following the submission of the Independent Environmental Audit (IEA). Change to a site Plan from Standard operating procedure template. Modifications relating to the start of construction and removal of old WWTP and associated equipment. Some minor modifications to Environmental Performance flow chart. Inclusion of references relating to use of Biogas through Boiler 3, update to complaints graphs and minor formatting changes.

17. APPENDICIES

APPENDIX No1

Risk Rating Matrix					
Consequences (How Bad?)	Likelihood (How Often?)				
	Frequent	Probable	Occasional	Remote	Improbable
Disastrous	5	5	5	4	3
Critical	5	5	4	3	2
Serious	4	4	3	2	2
Significant	4	3	2	1	1
Minor	3	2	1	1	1

Consequences	Injury	Liability	Environment	Plant
Disastrous	Fatality	>\$1,000,000	Potential for major on/off environment impact. Immediate action required. Prosecution and complaints will occur.	Total destruction of plant. Could occur without warning.
Critical	Amputation and/or permanent loss of bodily function	>\$100,000	Potential for significant on/off environmental impact. Regulators may prosecute and community likely to express concern.	Major disruption to production.
Serious	An injury resulting in more than 1 week off normal duties	>\$5,000	Potential for on/off environmental impact. Regulators aware of problem and community might express concern.	Minor disruption to production. Portion of product may need to be scraped or re worked.
Significant	An injury resulting in less than 1 week off normal duties	>\$500	Unlikely to cause on/off environmental impact. Event can be quickly and fully controlled.	Portion of product may have to be reworked, item does not conform, defect noticeable.
Minor	Minor first aid injury or no time lost	<\$500	No on/off environmental impact. Fully controlled by routine procedures.	Defect noticed by discriminating customers.

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