

## Appendix G

### *Investigating Odor Complaints*

Denver Environmental Health is responsible for regulating nuisance odors as defined under Denver Revised Municipal Code, Chapter 4 – Air Pollution Control, Section 4-10. Some odorants have no perceptible health impacts, but can still cause significant distress (avoid spending time outdoors during odor events etc). Thresholds for annoyance can vary from individual to individual, as well as from odorant to odorant.

The city ordinance for odor intensity is based upon Colorado State Law, and includes an odor definition, specific occurrences that result in a violation, affirmative defenses to a violation, and exemptions. Colorado State's Odor Control Regulation 2 sets standards for allowable odor contaminants for different land-use areas in the state and outlines control measures that can be taken to bring violators into compliance.

Denver investigates all odor complaints received. This includes speaking with the complainant to identify the source, independently verifying the odor, contact with the potential source, and issuing a corrective action or citation if necessary.

While all odor complaints are investigated, administrative citations can only be issued if: 1) The odorous contaminants are detected and exceed a regulatory threshold, or 2) DEH receives five or more complaints from separate households within a 12-hour period and the complaints are related to a single odor source. If either happens, the owner or operator will receive an administrative citation. The penalty for an odor citation varies, with a minimum of \$150 and a maximum of \$2,000. Nuisance odors rarely exceed regulatory thresholds in Denver.

#### How Odor Is Measured

To measure odor, an inspector may try to identify and determine the odor intensity using a portable odor-measuring device, like the "Nasal Ranger". The Nasal Ranger provides a scientific method of measuring odor strength in terms of 'dilution to threshold' (D/T) ratios. To make a D/T measurement, carbon-filtered air is mixed with a specific amount of odorous air. The D/T ratio is a measure of the number of dilutions needed to take the odorous air to a threshold that can be detected by the odor evaluator.