

**Environmental
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**GOVERNING
NUISANCE ODORS**



Approvals

Chair, Board of Environmental Health

Adopted

Manager, Department of Environmental Health

Date of Manager's Signature: _____

Attorney for the City & County of Denver

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SECTION 1.0 – INTRODUCTION

1.1 Authority

This rule is adopted by the City and County of Denver Board of Environmental Health and promulgated by the Manager of the Department of Environmental Health in accordance with the authority in Article II, Part 12, of the City and County of Denver Charter and in Chapter 4, Article II of the Denver Revised Municipal Code (“D.R.M.C.”).

1.2 Scope and Purpose

The purpose of this rule is to mitigate and control nuisance Odors within the City and County of Denver by specifying when an Odor Control Plan (“OCP”) is required, establishing the required components of an OCP, and detailing the approval process for OCPs.

1.3 Applicability

A. As provided in D.R.M.C. § 4-10, the following entities must submit an OCP in accordance with this rule:

1. Facilities that emit odorous contaminants that are detected when one (1) volume of the odorous air has been diluted with seven (7) or more volumes of Odor-free air, as measured by any instrument, device, or method designated by the Colorado Air Pollution Control Division to be used in the determination of the intensity of an Odor and in the enforcement of Colorado Air Quality Commission Regulation 2;
2. Facilities about which the Department receives five (5) or more complaints from individuals representing separate households or businesses within a 30-day period; and
3. Facilities that fall within the following regulated industries:
 - a. Pet food Manufacturing;
 - b. Marijuana Growing, Processing, and Manufacturing;
 - c. Rendering and meat byproduct Processing;
 - d. Asphalt shingle and coating materials Manufacturing;
 - e. Petroleum Refining;
 - f. Sewage Treatment; and
 - g. Wood preservation.

1.4 Severability

Should any section, clause, or provision of this rule be declared by a court of competent jurisdiction to be invalid, such decision shall not affect the validity of the rule as a whole, or any part thereof other than the part declared to be invalid.

SECTION 2.0 – DEFINITIONS

Except as noted below, words and phrases shall have the meaning assigned by the Charter and Revised Municipal Code of the City and County of Denver. As used in this rule, the terms listed below shall have the following meanings:

- 2.1 **“Administrative Controls”** means written procedural mechanisms used for Odor mitigation.
- 2.2 **“Board”** means the Board of Environmental Health of the City.
- 2.3 **“Department”** means the Department of Environmental Health of the City.
- 2.4 **“Engineering Controls”** means physical mechanisms used for Odor mitigation, such as the installation of process equipment, or the physical modification of a Facility’s process or process equipment, with the goal of mitigating Odors.
- 2.5 **“Facility”** means any building, structure, or location requiring an Odor Control Plan pursuant to D.R.M.C. § 4-10.
- 2.6 **“Growing”** means facilitating the natural development of a living thing.
- 2.7 **“Malfunction”** means the failure of Odor controls required by an Odor Control Plan lasting 24 or more hours, unless otherwise specified in the applicable Odor Control Plan.
- 2.8 **“Manufacturing”** means the act or process of producing something.
- 2.9 **“Odor”** means a quality of something that stimulates the olfactory organ.
- 2.10 **“Operator”** means the Person or entity that engages in or runs a business or enterprise.
- 2.11 **“Owner”** means the Person or entity having a legal or equitable interest in real property and its fixtures and appurtenances.
- 2.12 **“Person”** means any person, firm, association, organization, partnership, business, trust, corporation, company, contractor, supplier, installer, user or Owner and shall include any municipal corporation, state or federal governmental agency, district or any officer or employee thereof.
- 2.13 **“Processing”** means performing a series of mechanical or chemical operations in order to change or preserve something.
- 2.14 **“Refining”** means removing impurities or unwanted elements, typically as part of an industrial process.
- 2.15 **“Sewage Treatment”** means the process of removing contaminants from wastewater through physical, chemical, and biological means to produce environmentally safe treated wastewater.
- 2.16 **“Temporary”** means any single event lasting no more than 3 days, or a combination of events not to exceed 30 days, at any Facility in a calendar year.

SECTION 3.0 – GENERAL REQUIREMENTS

3.1 Responsibility

Each Person owning or operating a Facility shall be responsible for the development, implementation, and maintenance of the Facility’s OCP.

3.2 General Requirement

An OCP shall be submitted and implemented as required in D.R.M.C. § 4-10.

SECTION 4.0 – REQUIRED COMPONENTS AND APPROVAL PROCESS

4.1 Required Components

A. An OCP shall contain the following information:

1. Facility information:
 - a. Name of Facility;
 - b. Name, phone number, and email of Facility Owner;
 - c. Name, phone number, and email of Facility Operator or licensee;
 - d. Facility physical address;
 - e. Facility mailing address (if different from physical address);
 - f. Facility type;
 - g. Facility hours of operation;
 - h. Description of Facility operations;
 - i. Emergency contact information;
 - j. Business license application number and/or business file number(s) (if applicable); and
 - k. Air permit and permit number (if applicable).
2. Facility Odor emissions information:
 - a. Floor plan, specifying locations of Odor-emitting activity(ies) and emissions;
 - b. Specific Odor-emitting activity(ies); and
 - c. Phases (timing, length, etc.) of Odor-emitting activity(ies).
3. Odor mitigation practices, all based on industry-specific best control technologies and best management practices. This section shall include the range of Odor mitigation practices to be deployed to control Odor-emitting activities, sources, and locations, how and when these practices will be deployed, and accounting for any identified Odor-emitting activity phases.
 - a. Administrative Controls:
 - i. Procedural activities;
 - ii. Staff training procedures; and
 - iii. Recordkeeping systems and forms.
 - b. Engineering Controls:
 - i. For existing Facilities with Engineering Controls for all Odor sources on the date of rule adoption:

- (1) Evidence that Engineering Controls were installed and operational for all odor sources on the date of rule adoption.
 - (2) Evidence that Engineering Controls meet at least one of the following criteria:
 - (A) Are consistent with accepted and available industry-specific best control technologies designed to effectively mitigate Odors for all Odor sources.
 - (B) Have been reviewed and certified by a Professional Engineer or a Certified Industrial Hygienist as sufficient to effectively mitigate Odors for all Odor sources.
 - (C) Have been approved by the Department as sufficient to effectively mitigate Odors for all Odor sources.
 - (3) Components of Engineering Controls:
 - (A) System design;
 - (B) Operational processes; and
 - (C) Maintenance plan.
- ii. For new Facilities and existing Facilities without Engineering Controls for all Odor sources on the date of rule adoption:
 - (1) Each of the following components of Engineering Controls shall be reviewed and certified by a Professional Engineer or a Certified Industrial Hygienist as sufficient to effectively mitigate Odors for all Odor sources:
 - (A) System design;
 - (B) Operational processes; and
 - (C) Maintenance plan.
 - iii. If a Facility reasonably believes that Engineering Controls are not necessary to effectively mitigate Odors for all Odor sources, the Facility shall submit as part of its OCP the basis for such belief. If, in the Department's judgment, the Facility requires the utilization of Engineering Controls to effectively mitigate Odors for all Odor sources, the Department will notify the Facility that it deems the OCP to be deficient and will require the Facility to submit a modified OCP within a reasonable amount of time as determined by the Department. Failure to submit a modified OCP within the required time period shall be a violation of this rule.
4. Timeline for implementation of Odor mitigation practices, commencing upon notice from the Department that it has approved the Facility's OCP.
 5. Complaint tracking system.

- B. Odor mitigation practices shall be based on the best control technologies and best management practices commonly deployed to control Odor emissions from similar activity(ies) and source(s) by other similar businesses within the same industry type. A Facility may deviate from best control technologies and best management practices if the Facility demonstrates to the Department's satisfaction that the control technologies and management practices provided in its OCP will be sufficient to effectively mitigate Odors for all Odor sources.
- C. Sample OCP templates are provided as Appendices A and B to this rule.

4.2 Submission and Approval of Odor Control Plans; Modifications

- A. Odor Control Plan submission
 - a. New Facilities within the regulated industry types listed in Section 1.3.A.3 of this rule must submit to the Department for approval an OCP as part of their business licensure process.
 - b. Existing Facilities within the regulated industry types listed in Section 1.3.A.3 of this rule must submit to the Department for approval an OCP within ninety (90) days of rule adoption.
 - c. If a Facility exceeds either the dilution or complaint threshold as detailed in Sections 1.3.A.1 and .2 of this rule, the Department will notify the Owner or Operator of the Facility that it is required to submit an OCP within a reasonable amount of time, as determined by the Department.
- B. Department approval of Odor Control Plans
 - a. The Department will notify a Facility when its OCP has been approved.
 - b. The Department will notify a Facility if it does not approve of the Facility's OCP. The Facility will be required to submit modifications to its OCP within a reasonable amount of time, as determined by the Department. Failure to submit a modified OCP within the required time period shall be a violation of this rule.
 - c. Once a Facility receives notice that the Department has approved its OCP, it shall immediately commence with implementation of its OCP per the timeline it has provided as required in Section 4.1.A.4 of this rule.
- C. When a modification is made to a Facility, or Facility process, that has the potential to impact the nature or degree of Odor, or affects the control of Odor, the Facility must update its OCP within 30 days of Facility modification. Failure to submit an updated OCP within 30 days of Facility modification shall be a violation of this rule.
- D. Failure to comply with the OCP submission and approval process as outlined above shall be a violation of this rule.

4.3 Required Notice for Variance Petitions

- A. Any Facility seeking to obtain a variance from the requirements of this rule shall follow the procedure set forth in Part III of the Rules Governing Hearings Before the Board of Environmental Health.
- B. Such Facility shall afford the public notice of its variance petition by providing every neighborhood organization that is registered with the City and County of Denver pursuant to D.R.M.C. § 12-94 and located within a one (1) mile radius of the Facility with:
 - 1. A copy of the Facility's variance petition, within three (3) days of submitting such petition to the Board; and
 - 2. A copy of the Board's written notice setting forth the date, time, and place of the hearing, within three (3) days of receipt of such notice.

SECTION 5.0 – IMPLEMENTATION AND COMPLIANCE

5.1 Implementation

Upon receipt of notice that the Department has approved its OCP, a Facility must implement its OCP per the timeline provided in its OCP as required in section 4.1.A.4 of this rule.

5.2 Compliance

- A. All Malfunctions shall be reported to the Department. Any Facility failing to control Odors as required by its OCP shall be in violation of this rule. The Department may forego enforcement action given that the Facility responsible for the source of Odors does the following:
 - 1. Demonstrates to the satisfaction of the Department that the Malfunction resulted from:
 - a. Equipment breakdown or upset which is not the result of negligence or improper maintenance; or
 - b. Physical constraints on the ability of the Facility to comply with the OCP during startup or shutdown;And demonstrates that all reasonable measures have been taken to immediately minimize or eliminate the excess Odors.
 - 2. Reports such occurrence or upset or breakdown of equipment to the Department by the end of the next business day after the discovery of the occurrence.
- B. A Facility shall not be in violation of this rule for a Malfunction caused solely by force majeure.

SECTION 6.0 – RECORDKEEPING

6.1 Recordkeeping

Facilities must maintain, and provide to the Department upon request, all records relating to Odor control, including but not limited to, system installation, maintenance, deviations from OCPs, any Malfunctions, and records of complaints and response actions thereto.

SECTION 7.0 – INSPECTIONS

7.1 Inspections

- A. The Owner or Operator of a Facility shall allow the Department reasonable and safe access to the Facility for the purpose of inspecting Odor mitigation practices, Odor source(s), and records required to be kept pursuant to this rule.
- B. If an inspection reveals any material departure from a Facility's OCP, such departure shall be a violation of this rule.
- C. If an inspection reveals that that a Facility's OCP does not effectively mitigate Odors, the Department shall provide the Owner or Operator with notice of such deficiencies. The Facility will be required to submit a modified OCP within a reasonable amount of time, as determined by the Department. Failure to submit a modified OCP within the required time period shall be a violation of this rule.

APPENDIX A
ODOR CONTROL PLAN TEMPLATE
Marijuana Cultivation¹

1. TABLE OF CONTENTS

2. FACILITY INFORMATION

- a. Name of facility
- b. Name, phone number, and email of facility owner
- c. Name, phone number, and email of facility operator or licensee, and any authorized designees
- d. Facility physical address
- e. Facility mailing address (if different from physical address)
- f. Facility type
- g. Facility hours of operation
- h. Description of facility operations
- i. Emergency contact information
- j. Business license application number(s) and/or business file number(s) (if applicable)
- k. Air permit and permit number (if applicable)

3. FACILITY ODOR EMISSIONS INFORMATION

- a. Facility floor plan

This section should include a facility floor plan, with locations of odor-emitting activity(ies) and emissions specified. Relevant information may include, but is not limited to, the location of doors, windows, ventilation systems, and odor sources. If a facility has already provided the locations of specific odor-emitting activities and emissions in its business license application floor plan, it may instead reference the facility's business file number(s) and the relevant sections within such application where the floor plan is located.

- b. Specific odor-emitting activity(ies)

¹ **NOTE:** If the owner or operator of a facility believes that certain information contained in its odor control plan is confidential, it should clearly mark all information as such. This does not guarantee that such information will be exempt from disclosure under the Colorado Open Records Act. See C.R.S. § 24-72-200.1–206.

This section should describe the odor-emitting activities or processes (e.g., cultivation) that take place at the facility, the source(s) (e.g., budding plants) of those odors, and the location(s) from which they are emitted (e.g., flowering room).

- c. Phases (timing, length, etc.) of odor-emitting activities

This section should describe the phases of the odor-emitting activities that take place at the facility (e.g., harvesting), with what frequency they take place (e.g., every two weeks on Tuesdays), and for how long they last (e.g., 48 hours).

4. ODOR MITIGATION PRACTICES (all based on industry-specific best control technologies and best management practices)

For each odor-emitting source/process outlined in Section 3(b) of the Odor Control Plan, specify the administrative and engineering controls the facility implements or will implement to control odors.

NOTE that descriptions of ‘administrative controls’ and ‘engineering controls’ shall include, but are not limited to, the following sections:

- a. Administrative Controls

- i. Procedural activities

This section should describe activities such as building management responsibilities (e.g., isolating odor-emitting activities from other areas of the buildings through closing doors and windows).

- ii. Staff training procedures

This section should describe the organizational responsibility(ies) and the role/title(s) of the staff members who will be trained about odor control; the specific administrative and engineering activities that the training will encompass; and the frequency, duration, and format of the training (e.g., 60 minute in-person training of X staff, including the importance of closing doors and windows and ensuring exhaust and filtration systems are running as required).

- iii. Recordkeeping systems and forms

This section should include a description of the records that will be maintained (e.g., records of purchases of replacement carbon, performed maintenance tracking, documentation and notification of malfunctions, scheduled and performed training sessions, and monitoring of administrative and engineering controls).

Any examples of facility recordkeeping forms should be included as appendices to the OCP.

- b. Engineering Controls

- i. The best control technology for marijuana cultivation facilities is carbon filtration.
 - ii. For Existing facilities with engineering controls for all odor sources on the date of rule adoption:

- 1) Evidence that engineering controls for all odor sources were installed and operational on the date of rule adoption
- 2) Evidence that engineering controls are sufficient to effectively mitigate odors for all odor sources

This section should include evidence that Engineering Controls meet at least one of the following:

- A) *Are consistent with accepted and available industry-specific best control technologies designed to effectively mitigate odors for all odor sources.*
 - B) *Have been reviewed and certified by a Professional Engineer or a Certified Industrial Hygienist as sufficient to effectively mitigate odors for all odor sources.*
 - C) *Have been approved by the Department as sufficient to effectively mitigate odors for all odor sources.*
- 3) Components of engineering controls

This section shall include, but is not limited to, technical system design, a description of technical process(es), and an equipment maintenance plan.

A) System design

The system design should describe the odor control technologies that are installed and operational at the facility (e.g., carbon filtration) and to which odor-emitting activities, sources, and locations they are applied (e.g., bud room exhaust).

B) Operational processes

This section should describe the activities being undertaken to ensure the odor mitigation system remains functional, the frequency with which such activities are performed, and the role/title(s) of the personnel responsible for such activities (e.g., when trimming activities are conducted, X personnel are responsible for isolating the trim room from non-odorous areas of the facility and for ensuring the exhaust system is operational and routed through odor mitigation systems).

C) Maintenance plan

The maintenance plan should include a description of the maintenance activities that are performed, the frequency with which such activities are performed, and the role/title(s) of the personnel responsible for maintenance activities. The activities should serve to maintain the odor mitigation systems and optimize performance (e.g., change carbon filter, every 6 months, carried out by the facility manager).

iii. For new facilities and existing facilities without engineering controls for all odor sources on the date of rule adoption

- 1) The engineering control system and all components shall be reviewed and certified by a Professional Engineer or a Certified Industrial Hygienist as meeting professional expectations of competency and as sufficient to effectively mitigate odors for all odor sources.

This section shall include, but is not limited to, technical system design, a description of technical process(es), and an equipment maintenance plan.

A) System design

The system design should describe the odor control technologies to be installed and implemented at the facility (e.g., carbon filtration) and to which odor-emitting activities, sources, and locations they will be applied (e.g., bud room exhaust). It should describe critical design factors and criteria, with supporting calculations presented as appropriate (e.g., desired air exchanges per hour required to treat odorous air from specific areas, odor capture mechanisms, exhaust flow rates, rates of carbon adsorption consumption, etc.).

B) Operational processes

This section should describe the activities that will be undertaken to ensure the odor mitigation system remains functional, the frequency with which such activities will be performed, and the title/role(s) of the personnel responsible for such activities (e.g., when trimming activities are conducted, X personnel are responsible for isolating the trim room from non-odorous areas of the facility and for ensuring the exhaust system is operational and routed through odor mitigation systems).

C) Maintenance plan

The maintenance plan should include a description of the maintenance activities that will be performed, the frequency with which such activities will be performed, and the role/title(s) of the personnel responsible for maintenance activities. The activities should serve to maintain the odor mitigation system and optimize performance (e.g., change carbon filter, every 6 months, carried out by the facility manager).

- iv. If the facility reasonably believes that Engineering Controls are not necessary to effectively mitigate odors for all odor sources, the facility shall submit as part of its OCP the basis for such belief.

c. Timeline for implementation of odor mitigation practices

The timeline should begin upon receipt of approval from the Department, and should include a comprehensive timeline for the design, review process, installation, and operation of the

various odor mitigation practices outlined in Section 4 of the Odor Control Plan. In general, a timeline should consist of, but is not limited to, the following:

- i. Approval of OCP by the Department
 - ii. Approval of OCP by other City agencies
 - iii. Purchase and installation of engineering controls
 - iv. Inspections and approval by City agencies
- d. Complaint tracking system

This section may include, but is not limited to, the mechanism for, and the responsible staff involved in, receiving odor-related complaints, how and by whom such complaints will be addressed, and how the odor complaint and response will be recorded (e.g., logbook, complaint report).

5. APPENDICES

- a. Any recordkeeping forms from Section 4.a.iii.
- b. Odor complaint and response tracking form from Section 4.d.

APPENDIX B
ODOR CONTROL PLAN TEMPLATE
Marijuana-Infused Products (MIPs)¹

1. TABLE OF CONTENTS

2. FACILITY INFORMATION

- a. Name of facility
- b. Name, phone number, and email of facility owner
- c. Name, phone number, and email of facility operator or licensee, and any authorized designees
- d. Facility physical address
- e. Facility mailing address (if different from physical address)
- f. Facility type
- g. Facility hours of operation
- h. Description of facility operations
- i. Emergency contact information
- j. Business license application number(s) and/or business file number(s) (if applicable)
- k. Air permit and permit number (if applicable)

3. FACILITY ODOR EMISSIONS INFORMATION

- a. Facility floor plan

This section should include a facility floor plan, with locations of odor-emitting activity(ies) and emissions specified. Relevant information may include, but is not limited to the location of doors, windows, ventilation systems, and odor sources. If a facility has already provided the locations of specific odor-emitting activities and emissions in its business license application floor plan, it may instead reference the facility's business file number(s) and the relevant sections within such application where the floor plan is located.

- b. Specific odor-emitting activity(ies)

This section should describe the odor-emitting activities or processes that take place at the facility, the source(s) of those odors, and the location(s) from which they are emitted.

¹ **NOTE:** If the owner or operator of a facility believes that certain information contained in its odor control plan is confidential, it should clearly mark all information as such. This does not guarantee that such information will be exempt from disclosure under the Colorado Open Records Act. See C.R.S. § 24-72-200.1–206.

- c. Phases (timing, length, etc.) of odor-emitting activities

This section should describe the phases of the odor-emitting activities that take place at the facility, with what frequency they take place (e.g., every two weeks on Tuesdays), and for how long they last (e.g., 48 hours).

4. ODOR MITIGATION PRACTICES (all based on industry-specific best control technologies and best management practices)

For each odor-emitting source/process outlined in Section 3(b) of the Odor Control Plan, specify the administrative and engineering controls the facility implements or will implement to control odors.

NOTE that descriptions of 'administrative controls' and 'engineering controls' shall include, but are no limited to, the following sections:

- a. Administrative Controls

- i. Procedural activities

This section should describe activities such as building management responsibilities (e.g. isolating odor-emitting activities from other areas of the buildings through closing doors and windows).

- ii. Staff training procedures

This section should describe the organizational responsibility(ies) and the role/title(s) of the staff members who will be trained about odor control; the specific administrative and engineering activities that the training will encompass; and the frequency, duration, and format of the training (e.g., 60 minute in-person training of X staff, including the importance of closing doors and windows and ensuring exhaust and filtration systems are running as required).

- iii. Recordkeeping systems and forms

This section should include a description of the records that will be maintained (e.g., records of purchases of replacement carbon, performed maintenance tracking, documentation and notification of malfunctions, scheduled and performed training sessions, and monitoring of administrative and engineering controls).

Any examples of facility recordkeeping forms should be included as appendices to the OCP.

- b. Engineering Controls

- i. The best control technology for MIPs facilities is carbon filtration.

- ii. If the facility reasonably believes that Engineering Controls are not necessary to effectively mitigate odors for all odor sources, the facility shall submit as part of its odor control plan the basis for such belief.

A MIPs facility that demonstrates all of the following does not need engineering controls to effectively mitigate odors:

- 1) *The facility does not use oil activation processes on-site, and/or all products are made with activated oil.*
- 2) *The facility does not use distillation or extraction processes on-site; or the facility has received a permit from the Fire Department to use certain distillation or extraction processes.*
- 3) *The facility does not have cultivation processes co-located on-site. (If any cultivation processes are co-located on-site, engineering controls are required).*

NOTE: *A facility's belief that it does not need engineering controls to effectively mitigate odors for all odor sources is subject to approval by the Department.*

iii. For Existing facilities with engineering controls for all odor sources on the date of rule adoption:

- 1) Evidence that engineering controls for all odor sources were installed and operational on the date of rule adoption
- 2) Evidence that engineering controls are sufficient to effectively mitigate odors for all odor sources

This section should include evidence that Engineering Controls meet at least one of the following:

- A) *Are consistent with accepted and available industry-specific best control technologies designed to effectively mitigate odors for all sources.*
 - B) *Have been reviewed and certified by a Professional Engineer or a Certified Industrial Hygienist as sufficient to effectively mitigate odors for all odor sources.*
 - C) *Have been approved by the Department as sufficient to effectively mitigate odors for all odor sources.*
- 3) Components of engineering controls

This section shall include, but is not limited to, technical system design, a description of technical process(es), and an equipment maintenance plan.

A) System design

The system design should describe the odor control technologies that are installed and operational at the facility (e.g., carbon filtration) and to which odor-emitting activities, sources, and locations they are applied.

B) Operational processes

This section should describe the activities being undertaken to ensure the odor mitigation system remains functional, the frequency

with which such activities are being performed, and the role/title(s) of the personnel responsible for such activities.

C) Maintenance plan

The maintenance plan should include a description of the maintenance activities that are performed, the frequency with which such activities are performed, and the role/title(s) of the personnel responsible for maintenance activities. The activities should serve to maintain the odor mitigation systems and optimize performance (e.g., change carbon filter, every 6 months, carried out by the facility manager).

iv. For new facilities and existing facilities without engineering controls for all odor sources on the date of rule adoption

- 1) The engineering control system and all components shall be reviewed and certified by a Professional Engineer or a Certified Industrial Hygienist as meeting professional expectations of competency and as sufficient to effectively mitigate odors for all odor sources.

This section shall include, but is not limited to, technical system design, a description of technical process(es), and equipment an equipment maintenance plan.

A) System design

The system design should describe the odor control technologies to be installed and implemented at the facility (e.g., carbon filtration) and to which odor-emitting activities, sources, and locations they will be applied. It should describe critical design factors and criteria, with supporting calculations presented as appropriate (e.g., desired air exchanges per hour required to treat odorous air from specific areas, odor capture mechanisms, exhaust flow rates, rates of carbon adsorption consumption, etc.).

B) Operational processes

This section should describe the activities that will be undertaken to ensure the odor mitigation system remains functional, the frequency with which such activities will be performed, and the title/role(s) of the personnel responsible for such activities.

C) Maintenance plan

The maintenance plan should include a description of the maintenance activities that will be performed, the frequency with which such activities will be performed, and the role/title(s) of the personnel responsible for maintenance activities. The activities should serve to maintain the odor mitigation system and optimize

performance (e.g., change carbon filter, every 6 months, carried out by the facility manager).

c. Timeline for implementation of odor mitigation practices

The timeline should begin upon receipt of approval from the Department, and should include a comprehensive timeline for the design, review process, installation, and operation of the various odor mitigation practices outlined in Section 4 of the Odor Control Plan. In general, a timeline should consist of, but is not limited to, the following:

- i. Approval of OCP by the Department
- ii. Approval of OCP by other City agencies
- iii. Purchase and installation of engineering controls
- iv. Inspections and approval by City agencies

d. Complaint tracking system

This section may include, but is not limited to, the mechanism for, and the responsible staff involved in, receiving odor-related complaints, how and by whom such complaints will be addressed, and how the odor complaint and response will be recorded (e.g. logbook, complaint report).

5. APPENDICES

- a. Any recordkeeping forms from Section 4.a.iii.
- b. Odor complaint and response tracking form from Section 4.d.