



# Environmental SOPs

## SOP 1.33 Responding to Odor Complaints

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### 1.0 PURPOSE

Waste handling activities and waste decomposition at SPSA facilities can result in offensive odors. Offensive odors may also be mistakenly attributed to SPSA's facilities but may in fact emanate from conditions or sources that are not under SPSA's control. To ensure proper actions are taken to identify sources of odor at all SPSA waste handling facilities. To ensure proper verification, monitoring, and neutralizing corrective actions are taken to mitigate odors leaving the property from these locations that are under SPSA's control. To establish and maintain communication between SPSA, DEQ, or other regulatory agency and complainant until malodor issue is resolved.

### 2.0 SCOPE

This procedure applies to any complaint received at any SPSA waste handling facility.

### 3.0 RESPONSIBILITIES

3.1 The Supervisor of the SPSA facility subject to a malodor complaint is responsible for ensuring timely actions are taken in accordance with SOP.

3.2 The Facility Supervisor is responsible for the following:

- Initiating the Odor Complaint Form (EMS Form 40) OR recording the complaint in the odor tracking spreadsheet;
- Contacting the Landfill and Environmental Compliance Specialist or Environmental Specialist to take odor readings, if needed;
- Ensuring that the odor neutralizer, if applicable, is used as needed to remove the odors, and turned off when the source of odors is eliminated, neutralized, or when the wind is not blowing toward populated areas;
- Ensuring that sufficient neutralizer, if applicable, is stocked to control odor at all times; and

3.3 The Assistant Landfill and Environmental Superintendent is responsible for:

- Ensuring that the portable "Nasal Ranger" meter is kept in good working order, including validating its calibration prior to each use
- Ensuring trained personnel respond to odor complaints in order to record any findings;

3.4 The Landfill and Environmental Compliance Specialist is responsible for:



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- Notifying DEQ of odor incidents determined to emanate from SPSA's operations and subsequent corrective actions taken to abate those odors
  - Submitting the odor complaint tracking spreadsheet to DEQ as needed;
  - Maintaining the completed Odor Complaint Form OR tracking spreadsheet for three (3) years;
  - Following up with complainant following the internal investigation of the source of the odor.
- 3.5 The responding Environmental Specialist or other Environmental Management representatives are responsible for:
- Taking odor readings if needed at all SPSA facilities in response to odor complaints or at the request of facility supervisors during peak production times;
  - Completing survey maps as requested to include all Nasal Ranger readings taken if needed, and logging weather conditions; and
  - Notifying the Landfill and Environmental Compliance Specialist of all measurements and actions taken.
- 3.6 All SPSA employees are responsible for immediately reporting odor complaints to their supervisors.

### 4 REFERENCES

- Contact information for SPSA's Department of Environmental Management (DEM) personnel is as follows:

Name	Title	Phone #	Email
Henry Strickland	Landfill and Environmental Superintendent	757-961-3582 (o) 757-374-4548 (c)	<a href="mailto:hstrickland@spsa.com">hstrickland@spsa.com</a>
Michael Kelley	Asst. Landfill and Environmental Superintendent	757-961-3583 (o) 757-449-5351 (c)	<a href="mailto:mkelley@spsa.com">mkelley@spsa.com</a>
Heather Baggett	Landfill and Environmental Compliance Specialist	757-961-3674 (o) 757-418-3562 (c)	<a href="mailto:hbaggett@spsa.com">hbaggett@spsa.com</a>
Randy Roberts	Environmental Specialist	757-961-3651 (o) 757-418-0510 (c)	<a href="mailto:rroberts@spsa.com">rroberts@spsa.com</a>



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- 9 VAC 5-40-140 Existing Stationary Sources

#### 5 PROCEDURES

##### 5.1 Definitions:

- 5.5.1 ***Odor*** – A sensation that is a conscious reaction to a stimulus of our olfactory sense organs by odorous compounds in the air.
- 5.5.2 ***Malodor*** – The odor that is given off of putrescible solid waste and yard waste that has measurable Volatile Organic Compounds (VOCs) being emitted to the atmosphere.
- 5.5.3 ***Neutralizing Agent*** – Any commercial odor neutralizing (not masking) chemical delivered directly in a spray form to sources of odor.
- 5.5.4 ***VOC Measurement*** – A direct measurement of total Volatile Organic Compounds with a portable VOC meter, in PPM and PPB.
- 5.5.5 ***Odor character*** – The terms we use to describe an odor, generally as like something in our common experience; e.g., like “sewage”, or “rotten eggs”, or “garbage”, or “nail polish”, or “coffee”, or “grass”.
- 5.5.6 ***Odor Intensity*** – The strength of the perceived odor, such as “mild”, “moderate”, or “objectionable”.

##### 5.2 Discussion:

- 5.2.1 This procedure discusses the actions for responding to an odor complaint at SPSA facilities, or to identify known odor-causing conditions (such as sustained heavy rainfall). Each odor complaint will be investigated to determine the source of odor, which may or may not be a SPSA operation.
- 5.2.2 This SOP requires SPSA personnel to initiate actions to:
  - Quickly respond to odor complaints (within 3 business hours or less of receiving the complaint during operating hours or 6 business hours or less after hours);
  - Confirm the existence of an odor and identify its possible sources;
  - Document all readings taken and other pertinent data;



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- Notify all affected parties of actions taken to mitigate odors determined to originate from SPSA's activities (including the DEQ or other regulatory agency and the complainant); and
- Document corrective actions taken to mitigate the odor from SPSA's Facilities.
- Odor complaints that are received greater than 3 hours after the time of the perceived odor cannot be readily determined to be emanating from an affected facility, thus complaints that are received 3 hours after the perceived odor shall only be addressed by determining operating conditions at the affected facility and the status of any potential upset conditions.

#### 5.3 Procedure:

- 5.3.1 Any SPSA Facility Supervisor who receives an odor complaint shall notify the Asst. Landfill and Environmental Superintendent or the Landfill and Environmental Compliance Specialist.
- 5.3.2 The facility's Supervisor shall attempt to conduct a phone interview with the complainant for more details, if they were not provided in the original complaint.
- 5.3.3 If the Supervisor has already determined that his operation is the source of the odor, he shall immediately activate the facility's odor neutralizing spray system, if installed, and arrange to have odor readings taken in that area to determine the specific source of the odor.
- 5.3.4 The affected Supervisor will contact the Landfill and Environmental Compliance Specialist for odor complaints to initiate communication between DEQ or other regulatory agency and the complainant. The Supervisor shall forward the odor complaint form to the Landfill and Environmental Compliance Specialist or his/her designee of the complaint listing the location, complainant's name, phone number and type of malodor complaint.
- 5.3.5 The Environmental Specialist or other Environmental Management Representative will take Nasal Ranger readings as well as record weather conditions.
- 5.3.6 The readings will be taken at site boundary; or, if needed, at the area where the complainant indicates he or she smelled the malodors. All readings shall be documented and retained for at least three (3) years.
- 5.3.7 If the Environmental Specialist determines the cause of the odor is from a source **not** under SPSA's control, they shall record their findings including the identified source and contact the Landfill and Environmental Compliance Specialist.



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- 5.3.8 If the Environmental Specialist determines that a SPSA operation **is** the source of the odor, they shall complete their readings, record the current weather information, and immediately inform the facility supervisor and the Landfill and Environmental Compliance Specialist about their findings.
- 5.3.9 After odor neutralizer is applied to the affected area, if applicable, the Environmental Specialist will take follow-up readings and record them.
- 5.3.10 The Landfill and Environmental Compliance Specialist will then complete the odor tracking spreadsheet, ensuring that all required notifications are made. Notifications include:
- If the odor is determined to be emanating from the landfill: Call the responsible party of the odor to inform him of the conditions existing at their area of responsibility;
  - Notify the complainant of actions taken to abate the odor or informing them that environmental conditions beyond SPSA's control are believed to be the source of the odor.
  - Call the DEQ or other regulatory agency, if required, when the odor is derived from a SPSA waste handling facility.

#### 6.0 RECORDS

- EMS Form 40 - Odor Complaint Form
- EMS Form 41 (B—C) Odor Control Response Map

#### 7.0 DOCUMENT APPROVAL AND HISTORY

Revision	Date	Reason for Revision
0	9/11/06	Initial release
1	9/29/06	Scope of procedure expanded to include SPP. Responsibility for PIO added. Clarification of requirements to respond to multiple odor complaints from the same area
2	11/9/06	Added hydrogen sulfide to parameters monitored at facilities. Added DESM contact information. Added 24-business hour time limit for responding to malodor complaints.
3	9/17/07	Clarified notification requirements for responding to malodor complaints. Updated contact information.
4	2/27/08	Updated contact information. Reformatted procedure.



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5	09/25/08	Added WTPO's to the list of responders. Included changes for WTE after hours sampling. Adjusted the title for PIO to Public Relations Administrator.
6	3/10/10	Removed references to WTE Facilities and personnel. Shifted some responsibilities to the Environmental Supervisor. Transferred Public Information responsibilities to the Environmental Compliance Coordinator. Clarified the procedure.
7	07/05/11	Updated procedures to reflect current personnel and procedures.
8	08/14/17	Updated titles and current personnel.

#### SOP REVIEWED FOR TECHNICAL ACCURACY BY

Revision	Printed Name	Date
6	Glenda B. Dodson	03/10/10
7	Scott D. Whitehurst	07/06/11
8	Henry Strickland	08/14/17

#### APPROVED BY

Facility/Department	Approval Signature	Date
Management Representative		