Bryan W. Shaw, Ph.D., P.E., *Chairman*Toby Baker, *Commissioner*Jon Niermann, *Commissioner*Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 22, 2017

Mr. Mark Wahlstrom, Wastewater Treatment Superintendent Reflection Bay Collection System 3501 E Orange Street Pearland, Texas 77581

Re:

Investigation at:

Reflection Bay Wastewater Treatment Plant Collection System, Biscayne Bay

Boulevard Lift Station (Brazoria County), Texas 77584

Investigation No.: 1429251

Dear Mr. Wahlstrom:

The Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted a focused odor survey at the above-referenced facility. Ms. Nichole Batista Nunes and Mr. Isaiah Longoria of this office conducted an investigation on July 25, 2017. No violations are being alleged as a result of the investigation.

We appreciate your assistance in this matter and your interest in protecting the quality of our environment. If you have any questions concerning these findings, or if we can be of further assistance, please contact Ms. Nichole Batista Nunes at this office (713) 767-3638.

Sincerely,

Westin Massey, Team Leader

Water Section

Houston Region Office

WM/NBN/dgl

MWD_WQ0010134008_CO_20170725_FINAL REPORT **Texas Commission on Environmental Quality Investigation Report**

The TCEQ is committed to accessibility. If you need assistance in accessing this document, please contact oce@tceq.texas.gov

Customer: City of Pearland Customer Number: CN600595052

Regulated Entity Name: CITY OF PEARLAND Regulated Entity Number: RN101920007

Investigation # 1429251

Incident Numbers

NICHOLE NUNES **Investigator:**

Site Classification DOMESTIC MAJOR

Conducted: 07/25/2017 -- 07/25/2017

NAIC Code: 221320

SIC Code: 4952

Program(s):

WASTEWATER

Investigation Type: Compliance Investigation

Location: LOCATED APPROX 1000 FT N OF

MCHARD RD APPROX 1.25 MI W OF THE INTERX OF MCHARD RD AND SH 288 IN BRAZORIA

COUNTY

Additional ID(s):

TX0117501

WQ0010134008

Address: ,

Local Unit: REGION 12 - HOUSTON

Activity Type(s):

WWLSTMAJFC - Lift Station

Maintenance/Major Focused

WWRECONMAJ - WW Major Recon

Principal(s):

Role

Name

RESPONDENT

CITY OF PEARLAND

Contact(s):

Role

Title MAYOR Name

Phone Work

(281) 652-1600

REGULATED ENTITY MAIL

CONTACT

REGULATED

MR MARK

Work

(281) 652-1778

ENTITY

WASTEWATER TREATMENT

WAHLSTROM

HON TOM REED

Cell

(713) 775-4082

CONTACT

SUPERINTENDENT

Other Staff Member(s):

Role

Name

Investigator OA Reviewer ISAIAH LONGORIA ISAIAH LONGORIA

Supervisor

WESTIN MASSEY

Associated Check List

Checklist Name

Unit Name

WQ FOCUSED INVESTIGATION - INTERIM -

LIFT STATION - revised 10/17/2011

Lift Station

Investigation Comments:

INTRODUCTION

On July 25, 2017, investigators Mrs. Nichole Batista Nunes and Mr. Isaiah Longoria of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted a focused odor survey investigation in the City of Pearland, and in Fort Bend, Brazoria, and Harris counties in the west Pearland area. The purpose of this investigation was to conduct odor surveys to determine if odors were present in the area and identify potential sources.

INVESTIGATION

The investigation took place on July 25, 2017. The surrounding land use is a mix of residential, industrial, and commercial areas. The terrain is flat with sporadic forest. Meteorological conditions were as follows: Cloud Cover: Cloudy; Temperature: 86-90° Fahrenheit; Wind Direction: South-Southeast; Wind Speed: Approximately 6-8 miles per hour; Precipitation: 0.0 inches; Source of Meteorological Conditions: Weather Underground (KAXH) (Attachment One). The primary odor survey activities were conducted in zip code 77584, some portions of the odor survey activities may have also included portions of zip codes 77053, 77545, 77583 and 77047. A summary for all survey locations can be found in attachment one.

The investigators arrived at Sidonie Drive and McHard Road at 9:20 am and surveyed the northern side of the Blue Ridge Landfill. The investigators conducted a 15 minute odor survey. No unusual or objectionable odors were detected (Attachment Two). The investigators left at 9:35 am.

The investigators arrived at Blue Bonnet Drive at 9:52 am and surveyed the northern side of the Akzo Noble Surface Chemistry. The investigators conducted a 15 minute odor survey. No unusual or objectionable odors were detected. The investigators detected no odors (Attachment Three). The investigators left the area at 10:07 am.

The investigators arrived at Feld Drive at 10:21 am and surveyed the northeastern side of the Lonestar Recycling and Disposal Facility. The investigators conducted a 15 minute odor survey. No unusual or objectionable odors were detected (Attachment Four). The investigators left the area at 11:01 am.

The investigators arrived at the intersection at Biscayne Bay Drive at 10:53 am and surveyed the northeastern side of the Biscayne Bay lift station. The investigators conducted a 20 minute odor survey. The investigators detected a very light to light unpleasant odor (Attachment Five). At the time of the odor survey, Environmental Improvements (contractors for the Reflection Bay Wastewater Treatment Facility's collection system) was fixing the lift station's on site deodorizing station. Environmental Improvements stated that the motor on the deodorizing station would be fixed within the hour. The investigators left at 11:23 am.

The investigators arrived at FM 521 at 11:26 am and surveyed the northwestern side of the Energy Transfer Pipeline Odorizing Station. The investigators conducted a 15 minute odor survey. No unusual or objectionable odors were detected (Attachment Six). The investigators left the area at 11:31am.

The investigators arrived at Reflection Bay Drive at 11:56 am and surveyed the northwestern side of Reflection Bay Wastewater Treatment Plant (WWTP). The investigators conducted a 15 minute odor survey. No unusual or objectionable odors were detected (Attachment Seven). While onsite, the investigators observed the outfall for the WWTP. The outfall appeared to be clear, and aquatic life and water fowl were observed near the area.

The investigators arrived at the intersection of North Spectrum Boulevard and Hopper Road at 12:26 pm and surveyed the northern side of Syntech Chemicals and Brenntag Southwest. The investigators conducted a 37 minute odor survey. The investigators detected a light fishy amine odor intermittently (Attachment Eight). The investigators conducted an onsite survey at Syntech Chemicals. Although odors were determined to be coming from Syntech Chemicals, all processes appeared to be functioning normally. The investigators left the area at 1:15 pm.

An additional odor survey was completed onsite at Brenntag Southwest to determine if odors were emanating from the facility. No odors were detected onsite at the Brenntag Southwest facility .

CITY OF PEARLAND -

7/25/2017 Inv. # - 1429251

Page 3 of 4

Immediately after completion of the odor survey, investigators returned to the lift station on Biscayne Bay to verify the deodorizing station was working. It was functioning during the second visit and no odors were detected.

CONCLUSION

Two odors were detected during the odor surveys: a wastewater-related odor, and a sweet, fishy odor; emanating from the lift station located on Biscayne Bay, and from the Syntech Chemicals facility, respectively. According to the TCEQ Frequency, Intensity, Duration, and Offensiveness (FIDO) chart (Attachment Nine), the wastewater related odor is characterized as unpleasant . The intensity of odors emanating from the lift station varied from non-detectable to light . The intensity of odors emanating from Syntech Chemicals varied from non-detectable to light but is consider to be a not unpleasant odor.

ADDITIONAL INFORMATION

The Frequency, Intensity, Duration and Offensiveness (FIDO) chart categorizes the wastewater odor as unpleasant and the sweet, fishy odor as not unpleasant. In order to constitute a nuisance, a highly offensive odor has to last one hour with a very strong intensity as a single occurrence. An unpleasant odor has to last more than four hours on single occurrence to constitute a nuisance. The investigators documented an unpleasant very light odor present for 20 minutes from the lift station on Biscayne Bay.

COMPLAINTS

Based on a review of CCEDS and regional office files, there have been hundreds of odor complaints received from within the survey area and numerous investigations related to odors. At the time of the review, multiple related investigations were being conducted by the Region 12 Office.

ADDITIONAL ISSUES

No additional issues were noted during this investigation.

No Violations Associated to this Investigation

_ /_ 1. _

Signed	MBottal	Date
	Environmental Investigator	_
Signed	WM	Date
	Supervisor	_

Enforcement Action Request (EAR)	Maps, Plans, Sketches
Letter to Facility (specify type):	Photographs
Investigation Report	Correspondence from the facility
Sample Analysis Results	✓ Other (specify):
Manifests	1. Odor Survey Summary and Meteorological
Notice of Registration	Data
	2. Investigators' Odor Logs and Location Maps for Survey Point 1
	3. Investigators' Odor Logs and Location Maps for Survey Point 2
	4. Investigators' Odor Logs and Location Maps for Survey Point 3
	5. Investigators' Odor Logs and Location Maps for Survey Point 4
	6. Investigators' Odor Logs and Location Maps for Survey Point 5
	7. Investigators' Odor Logs and Location Maps for Survey Point 6
	8. Investigators' Odor Logs and Location Maps for Survey Point 7
	9. TCEQ Frequency, Intensity, Duration, and

Offensiveness (FIDO) chart

GFS Forecast for KHOU Time zone: CST

Day		Temp 77	Wind	Dir	Skies	Precip (Tmax 8	Tmin 7
	QI	4	1		220	0		86	11
	33	11	4	4	(3)	0	68	11	11
1	е9	1.1	2	1	3	0	91	78	11
Section 1	98	83	þ	-	3	0	81	83	111
	12p	88	7	-	20	0	89	88	11
ALC: U.S.	30	92	6	4	C	0	65	76	88
1	d9	87	6	None	V	0	73	92	98
nr-c7	9p	80	1	-	Ö	0	98	98	. 80

RUN TIME: 07/24/2017 06Z
Houston- Houston Hobby Airport, TX, United
States

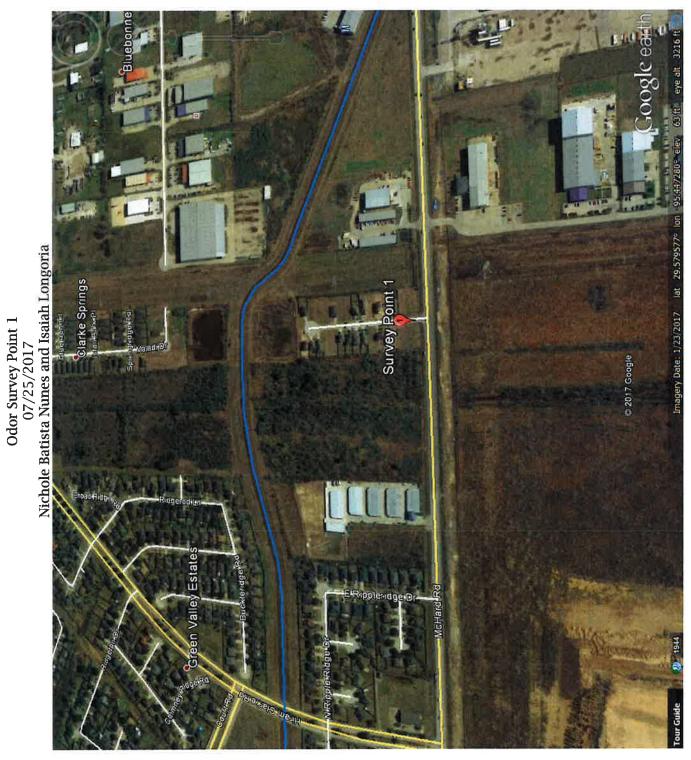
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	25	56	56	76	24	77	23	24
	30	56	25	25	25	28	31	33
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	81%	%9/	79%	%86	%96	100%	100%	82%
	1014	1015	1017	1017	1017	1019	1019	1018
	25°	. 56°	. 97	26 °	24 °	22 °	23 °	24 °
	21.	22 °	22°	22 °	21°	21 °	21°	20 °
	. 9-	. 9-	-7*	-7 °	-7.	. 8-	-7-	.4-
	290	591	592	591	591	593	593	593
	578	578	577	577	576	276	576	578
	ō	0	0	0	ō	0	0	0
	0	0	0	0	0	0	0	0
	SW 18	5SW 18	SSW 20	SSW 20	SSW 20	5 20	5 20	\$ 16
	SSW 18	SSW 22	SSW 25	SSW 25	SSW 22	SSW 18	S 11	S 11
	SSW 9	8.7	5.7	S 4	SSW 2	5.4	5.7	8.9
	20.	° 69	. 69	, O.	70°	72。	72 °	71。
	. 98	79 °	. 77	77 °	77。	77。	77°	. 88
	92 °	. 98	. 98	77。	78*	83 °	. 88	92 °
SS	. 98	° 6/	77.	77。	77.	83°	. 88	95 °
States	ue 07/25 0d	ue 07/25 03	ue 07/25 06	ue 07/25 09	ue 07/25 12	ue 07/25 1\$	ue 07/25 18	ue 07/25 21
	18	21	24	7.7	30	33	36	33

Investigator FIDO Log

- 1. Characterize the odor to determine which Offensiveness table to use (Not Unpleasant to Highly Offensive)
- 2. Assess the Intensity of odor (Very Light to Very Strong), for variable intensities use Supplemental Investigator's Odor Intensity Time Log.
 - 3. Determine the total <u>Duration</u> of the odor(s) (1 minute to 24 hours)
- - Identify the block on the chart that corresponds to the information from Steps 1-4 and determine if a nuisance condition exists. 4. Evaluate the Frequency of odor occurrence (Single Occurrence to Daily) 5. Identify the block on the chart that a contract of the contract of the chart that a contract of the chart that a contract of the contract of the chart that a contract of t

	Effects/Comments/Concerns	2.	Survey Point 1	Survey Point 2	Survey Point 3	Survey Point 4	Survey Point 5	Survey Point 6	Survey Point 7			
		Very Strong										
	nsity	Strong										
	Odor Intensity	Moderate										
	Opo	tdgid										
		Very Light					×		×			
	istic	Highly Offensive										
	racter	əviznəffO										
	Odor Characteristic	Unpleasant					×					2
	Opo	TassaslqnU toV							X			
	ons	Temperature (°F)	85	85	98	98	98	98	92			
1	Weather Conditions	(V/V) nisA	z	z	z	z	z	z	z			
	0	Wind direction	S	S	SE	SE	SE	SE	SE			
	ittent?	Was the odor interm (Y/V)		N/A	N/A	N/A	Y	N/A	Y			
		How long did the od		N/A	N/A	N/A	20mins	N/A	37mins	100		
		(s)əmiT	m	9:52am	10:17am	10:53am	11:26am	11:56am	12:26am			
	-	Date	7/24/17	7/24/17	7/24/17	7/24/17	7/24/17	7/24/17	7/24/17			

ate of Invest	tigation: 07/24/2017	Rd)	St	art Time: <u>9:20</u> 31468, -95.4	Jan 47425)	
1		130	J			85°F
Minutes	Odor Intensity VL, L, M, S,VS	_	Minutes	Odor Intensity VL	, L, M, S, VS	3
1 min	UD		31 min			78%Hu
2	ND		32			lemphs cloudy
3	MD		33			claudy
4	<u>ND</u>		34			_
5	ND		35			-
6	MD		36			
7			37			
8	ND		38			
9	ND		39			
10	MD		40			1
11	MD		41			
12	MD		42			1
13	ND		43			
14	ND		44]
15	MD		45]
16			46			Ì
17			47			1
18			48			1
19			49			1
20			50			1
21			.51			İ
22			52			İ
23			53			
24			54			
25			55			
26			56			
27			57			
28			58	Hills		
29			.59			
30			60			Į,
ffensiveness	: Highly Offensive	Unp	leasant	Not Unpleasan	ıt	
eighted Avera	ge Intensity:					•9
Min	VS S	M	L	VL	No Odor	
o Min					√ 15mins	
Hour					· (Jirking	



Start Time: 91 (29.588149 9:52am Date of Investigation: 07/24/2017_ ,-95.433556) Blue bonnet Dr Odor Intensity VL, L, M, S,VS Odor Intensity VL, L, M, S, VS 85°F Minutes Minutes ND 0.00 in 31 min 1 min ND 78% Hum 32 ND 6mpn S 33 ND 34 claudy MD 35 NO 36 6 ND 37 ND 8 38 ND 39 9 CILA 10 40 MD 11 41 MID 42 12 MD 13 HD 44 14 ND 15 45 16 46 47 17 48 18 19 49 20 50 21 51 52 22

53

54

55 56

57 58

59

Offensiveness: Highly____ Offensive ____ Unpleasant ____ Not Unpleasant ____

Weighted Average Intensity:

23 24

25

26 27

28 29

30

	VS	S	M	L	VL	No Odor
1 Min						
10 Min						V 15mins
1 Hour						



Date of Investigation: 07/24/2017______Start Time: 16:17cm

Minutes	Odor Intensity VL, L, M, S,VS
1 min	MD
	ND
2	ND
3	MD
5	ND
6	ND
7	MD
8	ND
9	MD
10	MD
11	ND
12	ND
13	NO
14	HD
15	ND
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
29	
30	

	(29.595126, -95.441751
Minutes	Odor Intensity VL, L, M, S, VS
31 min	
32	
_33	
34	
35	
36	
37	
38	
_39	
40	
41	
42	
43	
44	
45	
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49	(4)
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51	
52	
_53	
54	
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56	
57	
58	
59	
60	

86°F 0.00 in 74% Hum 7mpn SE cloudy

Offensiveness: Highly	Offensive	Unpleasant	Not Unpleasant
			· -

	VS	S	M	L	VL	No Odor
1 Min						
10 Min			-			V 15min



Date of Investigation: 7/24/2017 Start Time: 10:53 cm (29.560664, -95.424688)

-	1015 cayre 13 ay Dr
Minutes	Odor Intensity VL, L, M, S,VS
1 min	ND
2	V L
3	VL
4	VL.
5	L
6	ND
7	ND
8	ND
9	MD
10	VL
11	NO
12	L
13	L
14	L
15	MD
16	L
17	ND
18	VL
19	ND
20	ND
21	
22	
23	
24	
25	
26	
27	
28	
29	
30	

Minutes	Odor Intensity VL, L, M, S, VS
31 min	*
32	
33	
34	
35	
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37	_
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42	
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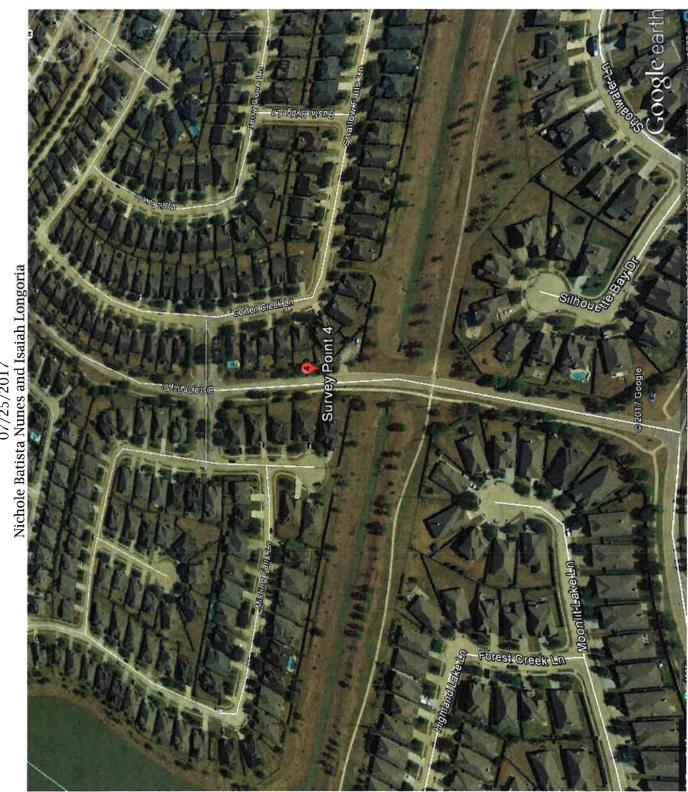
Offensiveness: Highly	Offensive	Unpleasant	/	Not Unpleasant	
U					

 Weighted Average Intensity:

 VS
 S
 M
 L
 VL
 No Odor

 1 Min
 Interpretation of the property of the p

86°F 0.00 in 74% Hum 7 mph SE cloudy



Odor Survey Point 4 07/25/2017

ATTACHMENT 6

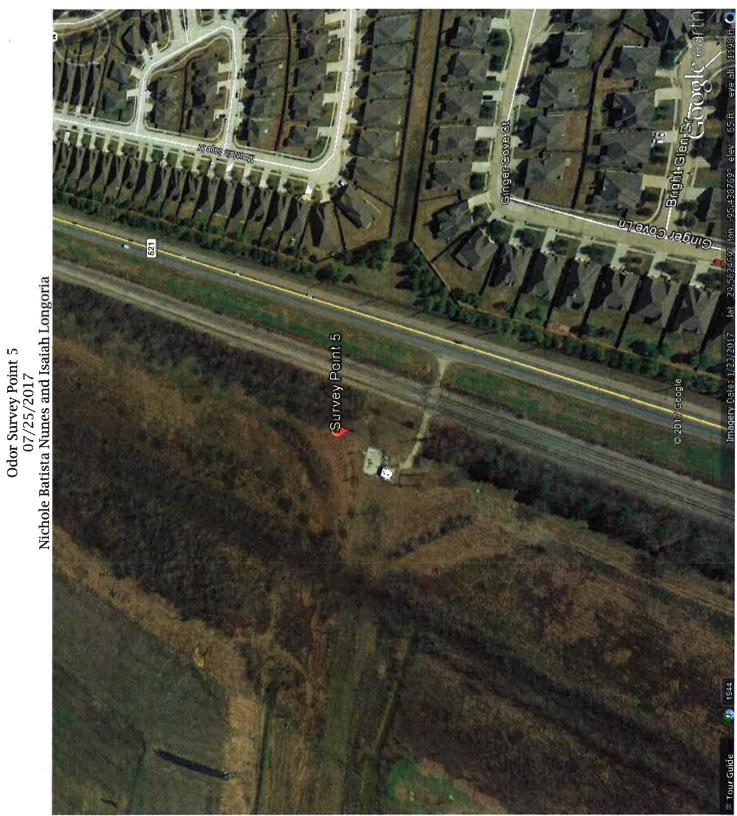
Start Time: 11: 260n Date of Investigation: 07/24/2017_____

Minutes	Odor Intensity VL, L, M, S,VS
min	ND
2	ND
	MD
3	ND
4	
5	ND
6	ND
7	ND
8	HD
9	HD
10	MD
11	ND
12	MD
13	ND
14	ND
15	MD
16	
17	
18	
19	
20	
21	
22	
23	
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25	
26	
27	
28	,
29	
30	

	(29.562743, - 95.439842)
Minutes	Odor Intensity VL, L, M, S, VS	86°F
31 min		Joel Hum
32		70% Hum 7mph SE Cloudy
33		Juby OF
34		cloudy
35		
36		
37		
38		
39		
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41		
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44	-9	
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50		12
51		,
52		
53		
54		
.55		
56		
57		
58		
59		1
60		

Offensiveness: Highly	_ Offensive	Unpleasant	Not Unpleasant
-----------------------	-------------	------------	----------------

	VS	S	M	L	VL	No Odor
1 Min						
10 Min						¥ 15min
1 Hour						



Start Time: 11:5600 (29.580218, -95,409220) Date of Investigation: 07/24/2017__

Minutes	Odor Intensity VL, L, M, S,VS
1 min	MD
2	ND
.3	MD
4	MD
-5	KID
6	ND
7	ND
8	ND .
9	ND
10	MD
11	ND
12	MD
13	MD
14	ND NO
15	MD
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21	¥1
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25	
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30	

Minutes	Odor Intensity VL, L, M, S, VS	- 86° - 0.0
31 min		- 70' - 7m - Cla
32		$ \neg$ \circ
33		Clo
34		
35		_
36		
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58		
59		
60		

G.00 in 70% Hum 7 mpn SE

Claudy

Offensiveness: Highly	_ Offensive _	Unpleasant	Not Unpleasant
-----------------------	---------------	------------	----------------

Weighted Average Intensity:						
	VS	S	M	L	VL	No Odor
1 Min						
10 Min						V 15 mins
1 Hour						



Odor Survey Point 6 07/25/2017

Date of Investigation: 7/24/2017

____Start Time: 12:26 pm (29,592)03,-95,404709)

(N. 5	petrum	Blud a	Hopper	
-------	--------	--------	--------	--

Minutes	Odor Intensity VL, L, M, S,VS
1 min	VL
2	
3	ND
4	NO
5	ND
6	ND
7	ND
8	VL
9	VL
10	L
11	VL
12	ND
13	MD
14	VL
15	ND
16	ND
17	L
18	CIN
19	L
20	ND
21	ND
22	ND
23	ND
24	ND
	VL
25 26	L
	VL.
28	ND
	ND
29	ND

	12/03, 15/10 13/10
Minutes	Odor Intensity VL, L, M, S, VS
31 min	ND
32	HD
33	VL
34	VL
35	NL NL
36	ND
37	ND
38	
39	
40	
41	
42	
43	
44	
45	
46	
47	
48	
49	
50	
51	
52	
53	
54	
55	110
56	
57	
58	
59	
60	

Offensiveness: Highly	Offensive	_ Unpleasant	Not Unpleasant
0 7			

Weighted Average Intensity:

	VS	S	M	L	VL	No Odor
1 Min						
10-Min 32min					~	
1 Hour						



FIDO CHART

ODORS CHARACTERIZED AS HIGHLY OFFENSIVE

DURATION	FREQUENCY					
	Single Occurrence	Quarterly	Monthly	Weekly	Daily	
1 minute	NA	NA	VS	S	M	
10 minutes	NA	vs	S	M	L	
1 hour	VS	S	M	L	VL	
4 hours	S	M	L	VL	VL	
12 hours+	M	L	VL	VL	VL	

ODORS CHARACTERIZED AS OFFENSIVE

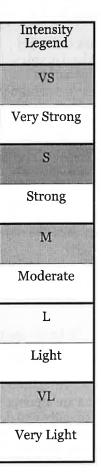
DURATION	FREQUENCY					
	Single Occurrence	Quarterly	Monthly	Weekly	Daily	
1 minute	NA	NA	NA	VS	S	
10 minutes	NA	NA	VS	S	M	
1 hour	NA	VS	S	M	L	
4 hours	VS	S	M	L	VL	
12 hours+	S	M	L	VL	VL	

ODORS CHARACTERIZED AS UNPLEASANT

DURATION	FREQUENCY					
	Single Occurrence	Quarterly	Monthly	Weekly	Daily	
1 minute	NA	NA	NA	NA	VS	
10 minutes	NA	NA .	NA	VS	S	
1 hour	NA	NA	VS	S	M	
4 hours	NA	VS	S	M	L	
12 hours+	VS	S	M	L	VL	

ODORS CHARACTERIZED AS NOT UNPLEASANT

DURATION	FREQUENCY					
	Single Occurrence	Quarterly	Monthly	Weekly	Daily	
1 minute	NA	NA	NA	NA	NA	
10 minutes	NA	NA	NA	NA	NA	
1 hour	NA	NA	NA	NA	VS	
4 hours	NA	NA	NA	VS	S	
12 hours+	NA	NA	VS	S	M	





ODOR CHARACTERIZATION EXAMPLES

The <u>character</u> of an odor is a unique, innate quality of an odor that does not vary with intensity. Under normal circumstances the following types/sources/processes may be characterized as indicated below, however, these examples should <u>only</u> be used as a guide; characterization should be based on the investigator's experience and training.

Highly Offensive

- Blood drying operations
- Sewage treatment primary sludge
- Putrefying animals/fish
- Hide processing
- Rancid grease
- Landfill gas, leachate, sour gas, paper mill black liquor, etc.-H₂S (smells like rotten eggs)
- Mercaptans (natural gas odorant)

Offensive

- Landfill garbage/waste
- Cattle lagoon cleanout
- Confined hog/poultry operations under bmp
- Decaying silage/composting
- Unprocessed rendering plant material and wastewater
- Typical grease trap odor
- Waste burning (rubber, plastic, tires, or other nonwood materials)
- Failing or improperly operated septic systems
- Organic products like auto body paint & styrene¹

Unpleasant

- Well digested or chemically-treated sludge
- Cattle operation under best management practices
- Waste-activated sludge processes
- Water-based painting
- Gasoline, diesel fuel
- Combustion exhaust
- Asphalt odors
- Burned coffee/food
- Brush/wood burning
- Petroleum products
- Ammonia
- Chlorine

Not Unpleasant

- Ketones, esters, alcohols
- Fresh-cut grass or hav
- Normal coffee roasting
- Normal food preparation
- Bakery
- Perfume
- Spice packaging
- Winery

¹At low concentrations, organic products such as auto body paint and styrene used in fiberglass and cultured marble operations would not normally be considered to have offensive odors. However, because of a person's potential physical response to these products at higher concentrations (where most complaints concerning these products occur), we generally consider them to have offensive characteristics.

DETERMINING FREQUENCY/DURATION

You are attempting to determine the frequency and duration that the <u>complainant</u> experiences over time. The frequency and duration observed during a single investigation may not accurately represent what the complainant is experiencing. You may have to use information gathered from multiple investigations (investigator observations as well as any information gathered on plant processes, weather, terrain, or complainant information) to make this determination. Consider the following:

- Daily: The odor has been documented during an investigator's odor survey at least three consecutive times in a 14-day rolling period at the complainant's site.
- Weekly: The odor has been documented during an investigator's odor survey at least three times at the complainant's site or equal distance in any 30-day period.
- Monthly: The odor has been documented during an investigator's odor survey at least two times at the complainant's site or equal distance in any 60-day period.
- Quarterly: The odor has been documented during an investigator's odor survey at least two times at the complainant's site or equal distance in any 90-day period.
- Single Occurrence: The odor has been documented during an investigator's odor survey at the complainant's site or equal distance.

Plant Processes

- Constant, seasonal, intermittent processes/activities (e.g., reactor top opened)
- Upset conditions, maintenance, startup & shutdown, etc.
- Plant records, sampling data, CEM data, etc.

Weather

- Wind rose from source to receptor
- Temperature or other meteorological data that could affect intensity or duration.

Complainant Information

- Statements as to frequency and duration
- Odor Logs
- Knowledge of source operations times, processes
- Other information as provided
- · Wind speed, day, night, summer, winter
- CAMS Station/NWS/ personal weather meter data

HOW TO USE THE FIDO CHART

Each of the four tables on this FIDO Chart represents a different level of offensiveness (Highly Offensive, Offensive, Unpleasant, and Not Unpleasant). The intensity of the observed odor is documented using the legend on the right side of the chart--with "VS" for Very Strong odors, "S" for Strong, "M" for Moderate, "L" for Light, and "VL" for Very Light. Once the overall frequency and duration have been determined (based on one or more investigations), they are then plotted on the horizontal and vertical axes of the appropriate table. If the odor situation is at least as intense as the colored block in which it is plotted for the corresponding duration and frequency, it is considered a nuisance odor. If the plot falls outside the colored area of the table (NA), the odor does not represent a nuisance.