



ODOR CONTROL PLAN

1. ODOR MITIGATION PRACTICES

a. Administrative Controls

i. Procedural activities

- A. Isolating odor-emitting activities from other areas of the buildings through closing doors
- B. Running HVAC systems dependent and independent carbon filtration
- C. Citizen Odor Advisory Committee

ii. Staff training procedures

- A. In-person training of staff, including the importance of closing doors and ensuring exhaust and filtration systems are running as required, and maintaining odor mitigation practices during delivery and order fulfillments
- B. Administrative personnel to oversee compliance of odor mitigation practices and engineering controls; including assessing for fumes that are perceptible without instruments by a reasonable person at the property line of the site

iii. Record keeping systems and forms

- A. Record of purchasing carbon filters and replacements
- B. Maintenance tracking, documentation and notification of malfunctions
- C. Scheduled and performed replacements/repairs
- D. Complaints and Resolution

a. Engineering Controls

i. Carbon filtration will be utilize with a HVAC system

- 1) Evidence will be provided that engineering controls for all odor sources were installed and operational
- 2) Evidence will be provided that engineering controls are sufficient to effectively mitigate odors for all odor sources
 - A) Are consistent with accepted and available industry-specific best control technologies designed to effectively mitigate odors for all odor sources.

3) Components of engineering controls

A) System design

Carbon filters will be installed throughout the facility dependent and independent of the HVAC system.

- a. Carbon filters work by a phenomenon called adsorption, where the odor compound is trapped inside the activated carbon and retained. Activated carbon removes odors by offering the odor-causing compound a more attractive place to reside than circulating in the air.

B) Operational processes

The HVAC system and carbon filtration continuously runs throughout the plant regardless of the heating or cooling setting ensuring the air is pulled through the filtration.

C) Maintenance plan

Carbon filters will be replaced per manufactures guideline by our environmental engineer team. Daily inspections of the HVAC system and odor will be performed by the assigned personnel on duty; records will be kept and provided upon request and inspections.

d. Complaint tracking system

i. Complaints

- 1) All complaints will be logged and tracked. A resolution will be provided for all complaints obtained.

ii. Citizen Odor Advisory Committee

- 1) The primary objective off the citizen odor advisory committee will help determine the effect of odors on the surrounding areas., foster constructive dialogue between the community and our facility, and facilitate resolutions of ongoing community concerns/complaints