



**County of Simcoe**  
**Solid Waste Management**  
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June 30, 2021

Sean Avery  
Technical Assessment and Standards Development Branch  
40 St. Clair Avenue West, 7th floor  
Toronto, ON M4V 1M2

Dear Mr. Avery,

Please accept the following comments with respect to the Guideline to Address Odour Mixtures in Ontario (ERO 019-2768), on behalf of the County of Simcoe.

The County of Simcoe recognizes and agrees with the need for addressing odour mixtures for specific activities and processes and is supportive of the Guideline generally. However, we ask that you note the following comments and concerns:

- Landfills are identified as a Tier 1 activity however have a 2000 m setback distance. Landfills should be separated into 'Active Landfills' and "Closed or Inactive Landfills" and have the setback distances modified accordingly. Closed landfills should take into consideration the size and age of the landfill and would be considerably less odourous than a landfill that is actively receiving waste.
- The guideline identifies the setback distance as measured from the edge of the point of discharge of the odour to the property boundary of the sensitive land use. Using the property boundary of a sensitive land use as the point of odour reception does not consider that for many properties, while the property size is significant, the actual portion of the property that is being used for the sensitive land use is much smaller. The point of odour reception should be measured from the actual boundary of the sensitive land use rather than from the property line of the sensitive land use.
- The Guideline states that odour measurements do not take odour offensiveness into account and that there is no standard for odour mixtures in Ontario. Since odour is a subjective measurement, more clarity is needed in order to assess odour against an objective scale.
- The guideline should address what happens if, through the Odour Assessment, it is determined that the detection threshold is less than 1 Odour Unit and nearby residents continue to complain. Will it be automatically determined that the facility is out of compliance?

The County of Simcoe is supportive of the Guideline to Odourous Mixtures in Ontario however would appreciate clarity on the above noted matters.

Sincerely,

Rob McCullough  
Director, Solid Waste Management