**Toronto Water Comments for ERO 019-2768 – Guideline to address odour mixtures in Ontario**

Toronto Water (Contact person: Ru Bai at ru.bai@toronto.ca) has reviewed the proposed Guideline to address odour mixtures in Ontario and has the following comments in italics:

**Re: Guideline to Address Odour Mixtures in Ontario**

**3.0 Odour-based Requirements for ECA Applications**

* *For facilities that have already done an Odour assessment, we do not want to repeat odour source testing. We recommend a remodelling be done when there is a process improvement that would require an ECA update. Any new odour sampling should be restricted to the areas of the process where there was an upgrade/change.*
* *Does a new receptor (e.g. a new building in the neighbourhood) trigger a remodelling and/or source testing?*

**3.2 Results of Odour Screening …**

**Best Management Practices Plan (BMPP) for Odour…technical bulletin entitled "Best Management Practices for Industrial Sources of Odour"**

* *The requirement for an engineer sign off after a minor update to the BMPP seems to be an onerous task.*

 **Odour Technology Benchmarking Report (OTBR)**

* *For facilities where there is an existing OTBR, it should be focused only on parts of the facility that was upgraded not facility wide.*

**3.3 Minimum Expectations for ECA Applications**

* *Does the MECP Design Guidelines for Sewage Works meet the minimum expectations for ECA applications?*

**3.4 Pre-Consultation with the Ministry**

* *Is the pre-consultation meeting a must?*
* *What are the consequences of not having this meeting or scheduling this meeting less than the 3 months window?*

**Re: Technical Bulletin - Methodology for Completing an Odour Assessment for Odour Mixtures**

**8.1 Existing Facilities Operating Over 1 OU**

* *Can a historical low number of confirmed odour events (complaints attributed to the facility) be added as another factor?*
* *1OU is too low a limit for screening in as this is the detection limit for odours.*
* *What does "offensive" means? We suggest this should be replaced by hedonic tone.*