

Friday, August 6, 2021

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

Dear Mr. Avery,

RE: Guideline to address odour mixtures in Ontario (ERO 019-2768)

The City of Guelph (City) appreciates the opportunity to comment on the proposed Guidelines for odorous impacts that may be caused by a single contaminant, or in many cases a mixture of contaminants via updates to the [Guideline to Address Odour Mixtures in Ontario \(Odour Guideline\)](#).

The City has a keen interest in the efforts of the Ministry of Environment, Conservation and Parks (MECP) proposed guidelines on odour-based standards (or other benchmarks) under [O. Reg. 419/05: AIR POLLUTION - LOCAL AIR QUALITY](#).

The City's comments on the proposed guidelines for odorous impact are described below:

Odour Guideline implementation

The City of Guelph supports the proposed guidelines which provides more clarity on how to identify, prevent, manage and remediate human health and environmental impacts caused by emitted odour.

The [Guideline to Address Odour Mixtures in Ontario \(Odour Guideline\)](#) will provide clear guidelines for new facilities or facilities undergoing current alteration, however the guideline lacks clarity on how it applies to existing facilities. In addition the guideline did not address facilities with intentions to consolidate their Environmental Compliance Approval (ECA) in the near future and the actions required to meet such situations.

Further clarity would also be helpful on how to address odours originating from listed sources that are in transport or en route to a facility for processing and how the complaints should be handled on a case by case approach.

Requirements for ECA application

The City supports the proposed guidelines referencing the application for an ECA and removing the requirement for Odour Impact Assessments or Odour Management and Control Plans for ECA applications involving waste disposal sites (such as composting facilities and landfills, etc.). However the guidelines do not confirm if the above omissions will apply to wastewater treatment facilities or a

wastewater facility seeking to consolidate its ECAs. Further clarity addressing proposed plans to consolidate ECAs for wastewater facilities would be helpful.

We appreciate this opportunity to provide feedback and encourage you to reach out to the City if you have any questions on our submission.

Sincerely,

Jennifer Rose, General Manager
Environmental Services, **Infrastructure, Development and Enterprise**
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