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KING COUNTY

1200 King County Courthouse 516 Third Avenue Seattle, WA 98104

Signature Report

July 15, 2003

Ordinance 14712

AN ORDINANCE adopting policies relating to odor

Proposed No. 2003-0178.2

plants and any new plant.

Sponsors Lambert, Hague and Phillips

2 .	control at wastewater treatment plants and conveyance
3	facilities; and amending Ordinance 13680, Section 5, and
4	K.C.C. 28.86.050.
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7	BE IT ORDAINED BY THE COUNCIL OF KING COUNTY:
8	SECTION 1. Findings.
9	A. The metropolitan King County council adopted the Regional Wastewater
10	Services Plan (RWSP) by Ordinance 13680 on November 29, 1999. The RWSP set forth
11	policies intended to guide the county in providing wastewater treatment at its existing
12	plants and in expanding treatment capacity through the year 2030. In treatment plant
13	policy 4 (TPP-4), the RWSP calls for King County to establish goals for odor control at
14	all treatment plants and calls for the executive to investigate potential technologies and
15	costs for odor control and recommend a policy so that odors are controlled at existing

B. In accordance with TPP-4 King County has investigated odor control and
prevention and measurement technologies and costs. An evaluation was performed on
the West Point Plant and South Plant and their associated odor control systems,
maintenance practices and operating data. A series of six odor control workshops were
held in March and April 2002 regarding state of the art odor prevention and control.
Engineering, public outreach, and operations and management staff from the county's
wastewater treatment division participated in these workshops along with outside
engineering experts. As a result of these efforts, King County defined the odor control
prevention levels currently achieved by the county's existing treatment plants and those
that are achievable.

D. The executive's recommended odor control policies as called for in TPP-4 of Ordinance 13680 are included in this ordinance.

SECTION 2. Ordinance 13680, Section 5, and K.C.C. 28.86.050 are hereby amended to read as follows:

Treatment plant policies (TPP).

A. Explanatory material. The treatment plant policies are intended to guide the county in providing treatment at its existing plants and in expanding treatment capacity through the year 2030. The policies direct that secondary treatment will be provided to all base sanitary flows. The county will investigate possible tertiary treatment with a freshwater outfall to facilitate water reuse. The policies also direct how the county will provide the expanded treatment capacity necessary to handle the projected increases in wastewater flows resulting from population and employment growth. The policies provide for the construction of a new treatment plant (the north treatment plant) to handle

flows in a new north service area, expansion of the south treatment plant to handle additional south and east King County flows, and the reservation of capacity at the west treatment plant to handle Seattle flows and CSOs. The potential for expansion at the west and south treatment plants will be retained for unanticipated circumstances such as changes in regulations. The policies address goals for odor control at treatment plants and direct that water reuse is to continue and potentially expand at treatment plants. The policies also describe a cooperative siting process for the new north treatment plant and its outfall.

B. Policies.

TPP-1: King County shall provide secondary treatment to all base sanitary flow delivered to its treatment plants. Treatment beyond the secondary level may be provided to meet water quality standards and achieve other goals such as furthering the water reuse program or benefiting species listed under the ESA.

TPP-2: King County shall provide additional wastewater treatment capacity to serve growing wastewater needs by constructing a new north treatment plant in north King county or south Snohomish county and then expanding the treatment capacity at the south treatment plant. The west treatment plant shall be maintained at its rated capacity of one hundred thirty-three mgd. The south treatment plant capacity shall be limited to that needed to serve the eastside and south King County, except for flows from the North Creek Diversion project and the planned six-million-gallon storage tank. The potential for expansion at the west treatment plant and south treatment plant should be retained for unexpected circumstances which shall include, but not be limited to, higher than

anticipated population growth, new facilities to implement the CSO reduction program or new regulatory requirements.

TPP-3: Any changes in facilities of the west treatment plant shall comply with the terms of the West Point settlement agreement.

TPP-4: ((King County shall establish goals for odor control at all treatment plants. In order to establish these goals, the executive shall investigate potential technologies and costs for odor control and recommend a policy to the council for inclusion in the RWSP. This investigation shall be completed and a policy adopted in a timely manner so that odors are controlled at existing plants and at any new plant. Odor control facilities and equipment shall be designed, and operated to meet these goals. In the case of the south treatment plant, King County's goal shall be to significantly reduce odor below baseline levels established in the development of the 1993 south treatment plant air model.)) King County's goal is to prevent and control nuisance odor occurrences at all treatment plants and associated conveyance facilities and will carry out an odor prevention program that goes beyond traditional odor control. To achieve these goals, the following policies shall be implemented:

1. Existing treatment facilities shall be retrofit in a phased manner up to the

High/Existing Plant Retrofit odor prevention level as defined in Table 1 of Attachment A

to this ordinance, the odor prevention policy recommendations dated March 18, 2003.

This level reflects what is currently defined as the best in the country for retrofit

treatment facilities of a similar size. Odor prevention systems will be employed as

required to meet the goal of preventing and controlling nuisance odor occurrences;

84	2. Existing conveyance facilities that pose nuisance odor problems shall be
85	retrofitted with odor prevention systems as soon as such odors occur, subject to technical
86	and financial feasibility. All other existing conveyance facilities shall be retrofitted with
87	odor control systems during the next facility upgrade;
88	3. The executive shall phase odor prevention systems implementing the tasks
89	that generate the greatest improvements first, balancing benefit gained with cost, and
90	report to the council on the status of the odor prevention program annually. This report
91	shall include a listing and summary of odor complaints received and detail progress on
92	implementing odor prevention policies and projects;
93	4. New regional treatment facilities shall be constructed with odor control
94	systems that are designed to meet the High/New Plant odor prevention level as defined in
95	Table 1 of Attachment A to this ordinance, the odor prevention policy recommendations
96	dated March 18, 2003. This level reflects what is currently defined as the best in the
97	country for new treatment facilities of a similar size;
98	5. New conveyance facilities serving these new regional treatment facilities shall
99	also be constructed with odor control systems as an integral part of their design;
100	6. Design standards will be developed and maintained for odor control systems
101	to meet the county's odor prevention and control goals;
102	7. A comprehensive odor control and prevention monitoring program for the
103	county's wastewater treatment and conveyance facilities will be developed. This
104	program shall include the use of near facility neighbor surveys and tracking of odor
105	complaints and responses to complaints and shall consider development of an odor
106	prevention benchmarking and audit program with peer utilities; and

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methods for pilot testing new technologies identified when determined by the executive to be necessary and appropriate for achieving the goals of this policy.

8. New odor prevention and measurement technologies will be assessed and

TPP-5: King County shall undertake studies to determine whether it is economically and environmentally feasible to discharge reclaimed water to systems such as the Lake Washington and Lake Sammamish watersheds including the Ballard Locks.

TPP-6: When there are opportunities to transfer flows between King County's treatment facilities and treatment facilities owned and operated by other wastewater utilities in the region, the county shall evaluate them. Such evaluation shall include, but not be limited to cost, environmental and community impacts, liability, engineering feasibility, flexibility, impacts to contractual and regulatory obligations and consistency with the level of service provided at the county owned and operated facilities.

TPP-7: King County may explore the possibility of constructing one or more satellite treatment plants in order to produce reclaimed water. The county may build these plants in cooperation with a local community and provide the community with reclaimed water through a regional water supply agency. In order to ensure integrated water resource planning, in the interim period prior to the development of a regional water supply plan, King County shall consult and coordinate with regional water suppliers to ensure that water reuse decisions are consistent with regional water supply plans. To ensure costs and benefits are shared equally throughout the region, all reclaimed water used in the community shall be distributed through a regional water supply agency consistent with a regional water supply plan.

129	TPP-8: King County shall continue water reuse and explore opportunities for
130	expanded use at existing plants, and shall explore water reuse opportunities at all new
131	treatment facilities.
132	TPP-9: A comprehensive public involvement program shall be developed and
133	implemented to provide the public, at a minimum, the opportunity to give input on the
134	criteria and the screening process used for selecting the list of possible sites for the new
135	north treatment plant, its conveyance system and outfall and to comment on the final
136	selection of a site. The King County executive shall establish one or more committees to
137	aid in the siting of a north treatment plant. The committees shall, at a minimum, evaluate
138	siting criteria to be used and propose a narrowed list of sites for consideration by the
139	executive after consulting with the council as follows:
140	1. The King County executive shall transmit a motion to the council that establishes the
141	criteria by which sites will be selected; and
142	2. The executive shall provide the council with timely reports that detail the sites
143	that meet the criteria and are under consideration and, at a later date, those sites that are
144	final candidates for the siting of the north treatment plant.
145	TPP-10: Based on criteria approved by the council, the King County executive shall
146	have the final decision on the site for a north treatment plant.
147	SECTION 3. The executive is hereby directed to update the RWSP operational

master plan that was adopted by Motion 10809 on December 6, 1999 to comply with this ordinance.

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Ordinance 14712 was introduced on 4/21/2003 and passed by the Metropolitan King County Council on 7/14/2003, by the following vote:

Yes: 12 - Ms. Sullivan, Mr. von Reichbauer, Ms. Lambert, Mr. Phillips, Mr. Pelz, Mr. McKenna, Mr. Constantine, Mr. Hammond, Mr. Gossett, Ms. Hague, Mr. Irons and Ms. Patterson

No: 0

Excused: 1 - Ms. Edmonds

KING COUNTY COUNCIL
KING COUNTY, WASHINGTON

Cynthia Sullivan, Chair

ATTEST:

Anne Noris, Clerk of the Council

APPROVED this 25th day of July, 2003.

Ron Sims, County Executive

Attachments

A. Odor Prevention Policy Recommendations, Regional Wastewater Services Plan Odor Control Strategy, March 18, 2003

2003.178

Odor Prevention Policy Recommendations

Regional Wastewater Services Plan Odor Control Strategy

March 18, 2003

King County
Department of Natural Resources and Parks
Wastewater Treatment Division

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King County Department of Natural Resources & Parks
Wastewater Treatment Division

Introduction

This document provides the recommended policy for the prevention of nuisance odors from King County's Wastewater Treatment Division's (WTD) facilities as required under the Regional Wastewater Services Plan (RWSP) and Ordinance number 13680, Section 5B TPP-4. This ordinance requires the following:

- Establishment of odor control goals at all treatment plants
- Design and operation of odor control facilities to meet the goals
- Investigation of potential technologies and costs
- Recommendation of a policy to the King County Council for inclusion in the RWSP
- Significant reduction of South Treatment Plant odors below 1993 air model levels

The information provided herein addresses the issues above. Policy recommendations, associated potential costs and background information are provided in this and in the associated document entitled *Wastewater Odor Prevention*. Odor prevention levels are defined herein with a discussion of odor causes, control methods, impact assessment and methods of measuring odor prevention program success. An assessment of odor prevention levels currently achieved by the wastewater facilities is provided with recommendations on the odor prevention level at which King County's facilities should operate to minimize community nuisance. Resources that will be required to achieve and maintain the recommended odor prevention levels are discussed and estimated.

The subjective interpretation of odors makes difficult the quantification of overall odor impacts. Odor perception is dependent on the intensity of the odor, its character, duration and the frequency of odor impacts. In addition, tolerance to odors varies from person to person. However, some generalities can be drawn regarding a community's overall tolerance. In regions of excellent air quality, such as Puget Sound, the tolerance for air pollution, including odors is quite low. The Puget Sound Clean Air Agency has the legal authority to regulate odor levels but the neighbors of King County's facilities will likely set the ultimate odor standards more stringently through direct contact with WTD facilities.

Because odor tolerance is community-dependent, odor prevention must be defined within the context of the community concerned. Using existing King County wastewater facilities and programs as a baseline, teams of WTD personnel and outside engineering experts held six workshops to assess the odor prevention levels achieved at the South and West Point treatment plants. Using these levels of odor prevention, higher and lower levels of odor prevention have been extrapolated and are defined in this document. WTD is working to minimize odor impacts and has determined the level of odor prevention necessary for each King County wastewater facility based on the existing and extrapolated odor prevention levels. Estimates of the resources necessary to achieve odor prevention success are provided.

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King County receives about sixty wastewater related odor complaints each year which is actually low considering the fact that each day approximately 250 million gallons of raw sewage is passing through densely populated areas and is then treated at plants surrounded by business, residential and recreational areas. However, using the volume of complaints received only partially defines odor prevention program success. It is widely accepted that more people are affected by wastewater odors than file formal complaints. Therefore, odor prevention programs must be evaluated on more than just the number of odor complaints received. The policies recommended below will provide a holistic, robust and effective program of nuisance odor prevention.

Implementation of this policy will require authorization for substantial capital investment and operating costs. A three-phase implementation approach is recommended as outlined in Appendix A. Phase 1 would implement those projects listed as Imperative in Tables A.1 and A.3. The Phase 1 project cost estimates for required capital are approximately \$4,300,000 for the South Plant and \$810,000 for the West Point Treatment Plant over three years following authorization. The increase in annual operating costs would be about \$360,000 and \$220,000 for the South and West Point Treatment Plants respectively.

After completion of the Phase 1 projects, a one-year evaluation period would be used to study the effects of the improvements. If odors are proven to be sufficiently controlled no further work will be necessary. If further odor control is required, the improvements listed as Recommended in Appendix A would be implemented in Phase 2 followed by another yearlong evaluation period. Finally, if still more improvements are required, those projects listed as Optional would be implemented in Phase 3. The additional efforts could raise the total required capital to approximately \$17,500,000 and annual operating costs to about \$890,000 for improvements to the South Plant over a nine-year period. Over this same period total capital for improvements at the West Point Treatment Plant could rise to approximately \$2,000,000 and operating costs to about \$540,000 dollars annually.

Policy Recommendations for Odor Prevention

The recommendations that follow are provided for the creation of a set of comprehensive policies for preventing odor nuisance events due to the activities and processes occurring in and around King County's wastewater conveyance and treatment systems. The recommendations are intended to result in a policy that will create a broad program of odor prevention that goes beyond conventional odor control. The proposed expansion of current efforts to prevent nuisance odors will significantly decrease the odor impacts on those communities near King County's wastewater facilities and bring the WTD to the forefront of wastewater utilities in its approach to dealing with odor issues.

Recommended Policies

King County Dept. of Natural Resource & Parks – WTD Odor Prevention Policy

King County's goal is to prevent and control nuisance odor occurrences at all treatment plants and associated conveyance facilities through the implementation of an odor prevention program that goes beyond traditional odor control. To achieve these goals, the following policies shall be implemented:

- 1. Existing facilities shall be retrofit in a phased manner up to the odor prevention level that reflects Best in the Country for existing facilities as defined in Table 1 of the Odor Prevention Policy Recommendations document dated March 18, 2003. Odor prevention systems will be employed as required to meet the goal of preventing and controlling nuisance odor occurrences.
- 2. The executive shall phase odor prevention systems implementing the tasks that generate the greatest improvements first, balancing benefit gained with cost, and report to the council on the status of the odor prevention program on an annual basis.
- 3. New regional treatment facilities shall be constructed with odor control systems that are designed to meet the odor prevention level that reflects the best in the country for new facilities of similar size.
- 4. Design standards will be developed and maintained for odor control systems to meet the county's odor prevention and control goals.
- 5. A comprehensive odor control and prevention monitoring program for the county's wastewater facilities will be developed. This program shall include the use of near facility neighbor surveys and tracking of odor complaints and responses to complaints and shall consider development of an odor prevention benchmarking and audit program with peer utilities.
- 6. New odor prevention and measurement technologies will be assessed and methods for pilot testing new technologies identified when determined by the executive to be necessary and appropriate for achieving the goals of this policy.

Odor Prevention Program

Preventing nuisance odor impacts is a major goal of responsible wastewater treatment organizations. In pursuit of this goal, a program of overall odor prevention, not just odor control, is necessary to address the proper design, operation and maintenance of wastewater facilities and their associated odor control systems. Many may consider the difference between an odor control and odor prevention program merely semantic in nature. However,

King County Department of Natural Resources & Parks
Wastewater Treatment Division

odor prevention represents a holistic program and a basic philosophical shift in the approach to solving the nuisance odor problem.

A comprehensive odor prevention program must address all the factors that contribute to nuisance odor impacts. Programs are frequently developed that focus solely on odor control devices and are limited to the collection and treatment of foul air emitted from wastewater systems. Controlling odor emissions in this way is not always sufficient to reduce odor impacts to levels that will satisfy the neighbors surrounding the wastewater facility. Even if all the odor-emitting sources are enclosed and their foul air is evacuated to an odor control device, odors can still escape. This can occur if there is a treatment process upset, a malfunction of the control device or if basic maintenance practices allow the creation and escape of untreated odorous gases.

Odor tolerance varies over time and affected communities tend to demand ever lower and less frequent odor impacts. In the time since the design and construction of most of King County's facilities, the standard of odor tolerance has changed, making necessary a current evaluation of odor prevention. The sections below describe various levels of odor prevention and the manner in which they were determined.

Various levels of odor prevention must be defined in terms that are understood by all involved. These definitions must take into account the sensitivity of the community and how odors are generated and ultimately impact the surrounding population. The level of odor prevention ultimately selected must be sufficient to satisfy the immediate communities while maximizing overall public benefit. Issues relevant to the selection of an acceptable odor prevention level are discussed below.

Defining Prevention Levels for King County

To establish levels of odor prevention that are accepted and understood by the community it is appropriate to use common and familiar points of reference. Table 1 below identifies the defining characteristics of each of four different levels of odor prevention.

Fortunately, King County has two major wastewater treatment facilities that employ various levels of odor prevention systems and can be used to establish reality-based odor prevention levels. The WTD has performed an evaluation of the two major treatment plants and associated odor control systems, maintenance practices, operating data, and previous third party evaluations to establish current odor prevention levels associated with each plant. As a result of significant system and topographic differences at the two treatment plants, and the density and proximity of neighbors, odor prevention currently achieved by each facility is at definable and different levels. This evaluation has provided a level of odor prevention for each plant from which other odor prevention levels have been extrapolated.

Table 1: Odor Prevention Level Characteristics

		Odor Pr	evention	Level	
Defining Characteristic	High/New Plant ^a	High/l Plant F	Existing Retrofit ^b	Medium	Low
Gases Captured from Odorous	All	T.	All	Most	Some
Processes Capable of Causing					
Nuisance Impacts					
Best Management Practices	Yes	Y	es	Partial	No
Identified and Followed					,
Odor Dilutions to Threshold c,d	0-3 ^e	0-3 ^e	3-5 ^f	5-20 ^e	20-50 ^e
Frequency of Impact (Hours per Year) ^d	<50	<100	<100	<100	>100

- a) Best in the country for new facilities
- b) Best in the country for existing facilities
- c) Odor intensity above background sources due to wastewater facility emissions
- d) Maximum allowable design value
- e) Routine operating range
- f) Non-routine operating range

Odor Prevention Levels - Points of Reference

The West Point Treatment Plant and the South Treatment Plant in Renton are both secondary treatment facilities that utilize primary sedimentation, aeration basins, secondary sedimentation and anaerobic digestion to treat wastewater prior to discharge to Puget Sound. At the time of their design the potential for odor impacts was assessed using appropriate available methods. Several significant differences in the design and operation of the plants render them at two different levels of odor prevention capability by virtue of their current design configurations. The major differences between the plants are noted below.

Aeration basins provide secondary treatment by allowing aerobic biological activity to consume organic pollutants. The treatment plant at West Point uses high purity oxygen to oxygenate the wastewater in its covered aeration basins, while the South Treatment Plant uses compressed air in uncovered basins. This results in approximately 15 times the volume of gas passing through the South Treatment Plant's aeration basins compared to those at the West Point Treatment Plant. As a result, more odorous gases are passed out of the aeration basins at the South Treatment Plant than from those at the West Point Treatment Plant. The gases emitted from the aeration basins at both facilities are discharged directly to the atmosphere without treatment.

The second design parameter that is of significant difference between the two facilities is the chemistry in each facility's wet chemical scrubbers. In both systems, an oxidant may be added to chemically react with the odorous compounds so that they are not released to the air. The South Treatment Plant's scrubbers were designed to use sodium hypochlorite as the oxidant while the West Point Treatment Plant's systems were designed to use hydrogen peroxide. Hydrogen peroxide has proven over time to be less effective in preventing odorous gas emissions than sodium hypochlorite.

Significant improvements in odor prevention can be achieved at both the West Point and South treatment plants by improving their odor control systems and methods of operation. Implementation of the improvements that follow in Appendix A will allow the plants to operate with very low-level odor impacts on the surrounding communities. However, bringing the plants to the level of odor prevention achievable by a plant of contemporary design with state-of-the-art odor prevention systems integrated with the wastewater treatment processes is essentially impossible. Substantial portions of the facilities would require significant modifications and would require virtually rebuilding major portions of the treatment plants.

South Treatment Plant Odor Prevention

Historical Perspective

The South Treatment Plant is located between the cities of Tukwila and Renton approximately five miles south of the King County airport and is bordered by office parks, light industry and nearby residential neighbors. The location of the plant and the proximity of its neighbors can be seen on the King County WTD Facilities Map (Figure A) and a plant photo (Figure B). The plant originally began operations in July of 1965. In 1991 the Renton III project began to increase the plant's wastewater treatment capacity. As an integral part of the expansion, wet chemical odor control scrubbing systems were added to help control the anticipated additional odor impacts.

Current Odor Prevention Level

The South Treatment Plant's odor prevention level has been assessed at the Medium (Table 1) level. As described in the *Wastewater Odor Prevention* document, many odorous sources at the South Treatment Plant are covered and their associated foul air is treated prior to release. However, the odors from several sources remain untreated. This, coupled with odor complaint data and observations by process, operations and engineering personnel, has led to the consensus among participating WTD staff that the South Treatment Plant represents a Medium level of odor prevention ability.

Odor Prevention Level Recommendation

As with all King County facilities, it is recommended that the South Treatment Plant be configured to operate at an odor prevention level sufficient to prevent a nuisance. Implementation of certain capital, operational and maintenance changes can accomplish a High/Existing Plant Retrofit odor prevention level at the approximate costs and within the approximate time frames listed in Appendix A.

Requirements to Achieve Recommended Odor Prevention Level

In 1999 the Renton III Pre-Design – Odor Control Program report recommended several capital changes to prevent odor emissions. Those recommendations that have not yet been implemented included covering, evacuating and treating foul air from the following sources:

Return Activated Sludge (RAS) Channel

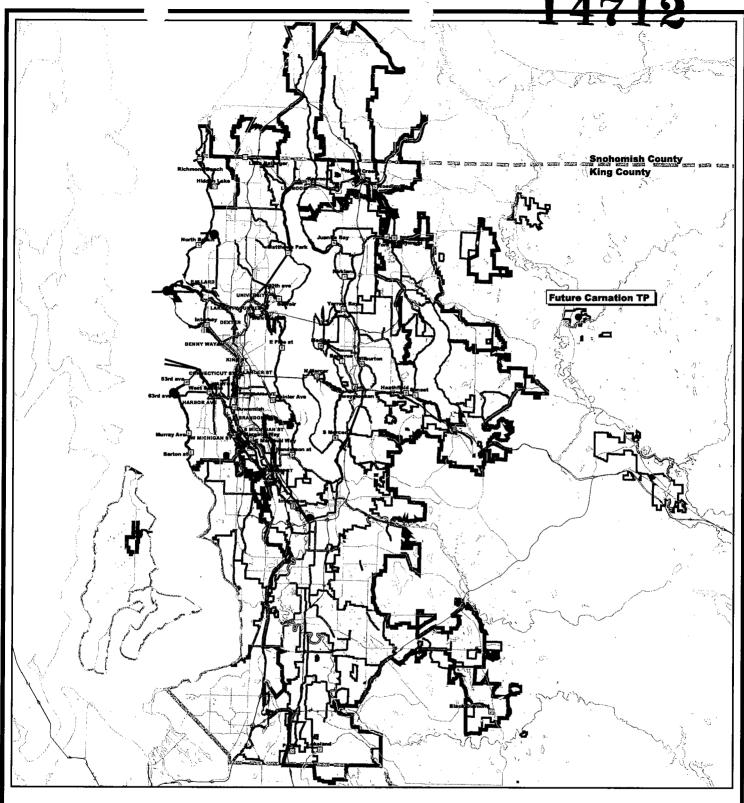


Figure A: King County WTD Facilities Map

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November 19, 2002

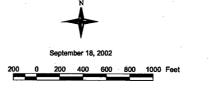
Freeway KC Treatment Plants KC Regulator Stations KC Pump Stations KC Sewerlines KC WTD Service Area KC Boundary Cities

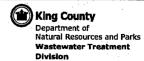
Legend



Figure B: South Treatment Plant

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- Mixed Liquor Channels
- Aeration Tanks
- North & South Primary Sedimentation Tanks

It further recommended repair of the digester covers. Changes to the digester covers have since been implemented so that this action is no longer necessary. The 1999 report provided estimated capital costs to affect a variety of capital changes to enhance odor control. Those changes that have not yet been implemented are included in Table A.1 of Appendix A with additional improvements considered appropriate by WTD staff. These additional improvements, detailed in Appendix A, will require capital investments in equipment and increased expenditures for operation and maintenance. Capital improvements include capture and treatment of foul air from the grit structure and the purchase of additional odor monitoring equipment. Operational changes will increase the rate of consumable materials used to prevent odor production and remove odors from foul air streams. Maintenance of process and odor prevention equipment will be enhanced to reduce odor emissions and maintain odor removal efficiencies of the odor prevention equipment. Removing odor-causing debris from process equipment, monitoring of odorous emissions and additional attention to odor control equipment will increase the level of odor prevention achievable at the treatment plant.

The costs have been adjusted to 2002 dollars using an annual inflation factor of three percent. In addition to the capital costs, additional time will be required by plant personnel to perform O&M activities associated with the new odor prevention methods. The time identified with the additional odor prevention activities is also listed in Table A.1 of Appendix A as the number of full time equivalent (FTE) employees required. The approximate phasing of improvement implementation is shown in Table A.2.

West Point Treatment Plant Odor Prevention

Historical Perspective

The West Point Treatment Plant is located northwest of Discovery Park approximately four miles west of the Ballard bridge. The location of the plant and proximity of its nearby neighbors can be seen on the King County WTD Facilities Map (Figure A) and a plant photo (Figure C). The plant originally began operation in 1964 and was most recently upgraded in 1991 to add secondary treatment processes. As an integral part of the expansion, wet chemical odor control scrubbing systems were added to help control the anticipated additional odor generation.

In November 1998 the Odor Assessment and Preliminary Design report regarding the status of odor sources at the West Point Treatment Plant was produced. The report identified what were believed to be the plant's points of odorous emissions and recommended steps to reduce emissions from those sources.

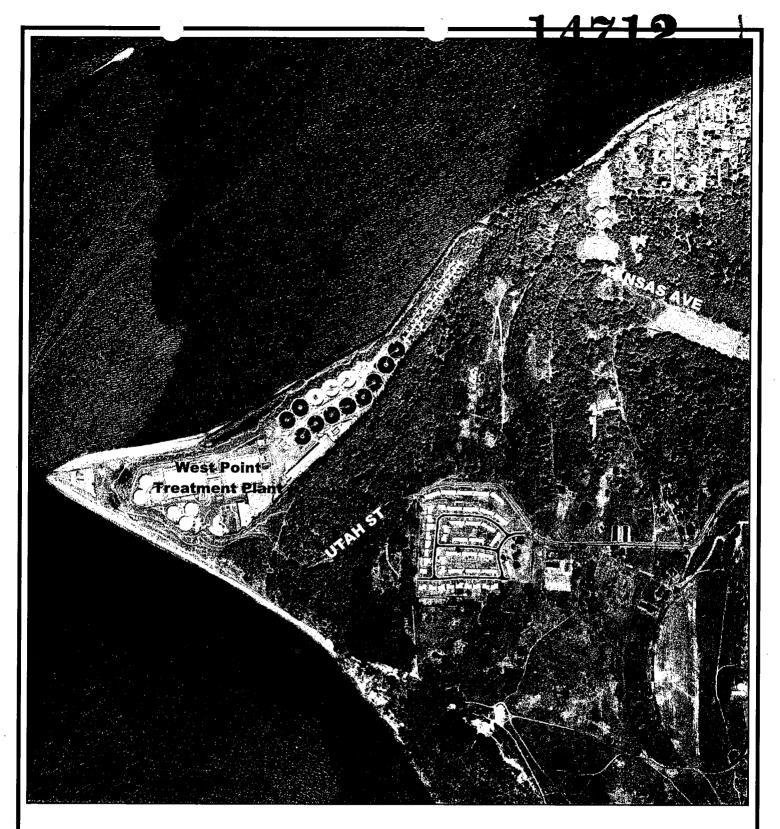


Figure C: West Point Treatment Plant

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Current Odor Prevention Level

The West Point Treatment Plant treats the vast majority of its odorous air with liquid chemical

scrubbers. This should allow the achievement of a High level of odor prevention. For these reasons, WTD staff defined the odor prevention level capability of the plant as High by virtue of its design. However, there are operational procedures and events at the West Point Treatment Plant that lowers the ability to prevent nuisance odors to the Medium level.

Odor Prevention Level Recommendation

As with all King County facilities, it is recommended that the West Point Treatment Plant be configured to operate at an odor prevention level sufficient to prevent a nuisance. This will require that the West Point Treatment Plant be raised from Medium to a maintainable High/Existing Plant Retrofit odor prevention level. Operating the facility at a High odor prevention level can be accomplished by implementing certain capital, operational and maintenance changes.

Requirements to Achieve Recommended Odor Prevention Level

In the 1998 Odor Assessment and Preliminary Design report, cost estimates to implement a variety of suggested improvements to enhance odor control were provided. The WTD has already implemented many of the changes to prevent odors from those sources that were either high odor emitters or required simple modifications. Those improvements and others that are considered appropriate by WTD, follow in Appendix A. The costs have been adjusted to 2002 dollars using an inflation factor of three percent. The tentative project schedules and costs of implementation by task are provided in Appendix A.

Improvement recommendations detailed in Appendix A include changes to odor prevention systems that will require capital investments in equipment and increased expenditures for operation and maintenance. Capital improvements include modification of the existing odor scrubber chemical systems, capture and treatment of foul air from the division and mixed liquor channels, and the purchase of additional odor monitoring equipment. Operational changes will increase the rate of consumable materials used to prevent odor production and remove odors from foul air streams. Maintenance of process and odor prevention equipment will be enhanced to reduce odor emissions and maintain odor removal efficiencies of the odor prevention equipment. Removing odor-causing debris from process equipment, monitoring of odorous emissions and additional attention to odor control equipment will increase the level of odor prevention achievable at the treatment plant.

Operation and maintenance of the odor control systems and odor prevention tasks will require increased labor by the treatment plant operators. The labor identified with the additional odor prevention activities is listed in Appendix A as the number of FTE employees required.

Vashon Island Treatment Plant Odor Prevention

Historical Perspective

The treatment plant on Vashon Island was built in 1972 and operated by the Vashon Island Sewer District until acquired by King County in 1999. The plant location is shown in Figure A. A photo of its proximity to neighbors is provided as Figure D. The plant is located in a low-density population area approximately one half-mile northeast of Vashon Island's main business center. The plant utilizes aerobic processes appropriate for the low wastewater volumes treated. These processes emit low level odorous gases that have not significantly impacted the surrounding community. To date, no odor control equipment has been installed in or around the facility. A general upgrade to the treatment plant is planned to be complete by 2006 and will include odor prevention systems and procedures.

Current Odor Prevention Level

The level of odor prevention the Vashon plant currently achieves has been assessed at a Medium level. This is achieved because the untreated low odor emissions from the plant's processes do not severely impact the relatively low-density neighborhood.

Odor Prevention Level Recommendation

As with all King County facilities, it is recommended that the Vashon Island Treatment Plant be configured to operate at an odor prevention level sufficient to prevent nuisance level odors. Development of the odor prevention systems will occur during the upcoming plant upgrade design. Capital improvements will be implemented as a result and operational and maintenance procedural changes will be developed as part of the design process.

Requirements to Achieve Recommended Odor Prevention Level

Improvement requirements will be determined during the plant upgrade design. Each facility is unique and odor prevention must be tailored to the specific system or facility. At a minimum, the treatment plant's headworks and solids handling processes will be ventilated to an odor prevention system. Criteria from Table 1 must be designed into the facility at the time of design to optimize the value of the odor prevention system investment.

Operation and maintenance of the odor control systems and odor prevention tasks will require the labor of the treatment plant operators. The time required by personnel to implement the odor prevention program will be assessed and appropriate staffing levels determined during the upcoming design. Proper funding of positions must be allocated to assure odor prevention program success.

Off-Site Conveyance System Odor Prevention

Historical Perspective

The wastewater conveyance system that exists today is in large part the result of the findings

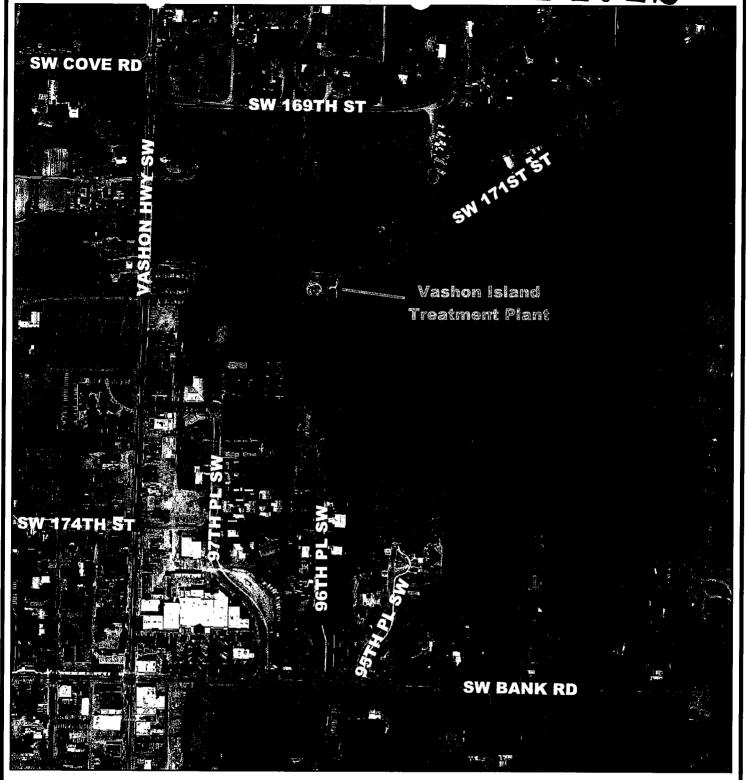
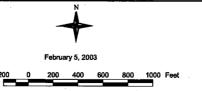
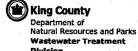


Figure D: Vashon Island Treatment Plant

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Wastewater Treatment

King County Department of Natural Resources & Parks
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and recommendations set forth in the *Metropolitan Seattle Sewerage and Drainage Survey* 1956-1958. That document described the issues and design requirements for wastewater conveyance and treatment, but is silent on the issue of odors from wastewater sources.

Since its inception, the conveyance system has grown to include approximately 300 miles of pipe. The system passes through urban, rural, residential and industrial neighborhoods. Increasing wastewater flows and population densities have resulted in increased odor impacts near certain conveyance facilities requiring the installation of odor control systems. Although the RWSP ordinance did not require a policy on the conveyance system, this recommendation includes extending the odor policy to the entire system. Current WTD design standards require odor control systems at all new or upgraded facilities.

In 1995 the WTD commissioned the H_2S (hydrogen sulfide) Odor/Corrosion Control – Technical Work Plan & Budgetary Estimate report. That report summarized the available data, potential technologies for odor control, and provided a work plan to address odor (and corrosion) problems in portions of the conveyance system. Based on this report, additional data and experience, the WTD will be completing by the second quarter of 2003 a comprehensive plan for odor and corrosion abatement in the conveyance system. This plan will address present and potential nuisance odor problems due to conveyance system operations.

Predicting odor emissions from the conveyance system is not a simple task. Approximately 10,000 connections from local public agencies (LPAs) contribute wastewater to the King County conveyance system that varies in flow rate and composition. The comprehensive plan will address odor prevention in those portions of the system that are known to, or are expected to, emit nuisance odors. As part of this effort, conveyance system hydrogen sulfide gas levels and other relevant parameters are being monitored and data is being collected to identify those areas requiring odor prevention measures.

Some odor emissions are not predictable and can result from high sulfide discharges from a LPA or may be the result of unplanned or inappropriate discharges by residential or industrial sources. This type of odor event can occur throughout the system but is usually localized around one of the 135-off-site facilities or approximately 3,000 manholes. Short-term transient odor problems can be corrected with temporary control measures such as sealing or installing small carbon inserts into manholes or other vent points. To deal with temporary large-scale odor events, the WTD has acquired five mobile odor control units. These units are carbon odor scrubbers housed in trailers that may be dispatched with mobile electrical generators to establish temporary odor control when the need arises.

The WTD currently requires that odor prevention be incorporated into each new offsite facility upgrade or new facility design. Multiple odor prevention projects are currently in design or construction.

Current Odor Prevention Level

For the most part the current conveyance system operates without generating nuisance odors. Off-site conveyance system operators and maintenance personnel monitor odor control systems as part of their routine inspections. As a result of this vigilance and maintenance, nuisance odors are generally prevented. These factors, coupled with odor complaint data and observations by the Division's process, operations and engineering personnel, led to ranking the conveyance system at a High/Existing Plant Retrofit level of odor prevention overall. However, as noted above, the system is quite dynamic and as flows and populations increase, problems with nuisance odors do occur. Below are discussions on odor complaint response and investigation and community relations that explain the approach to resolving these types of occurrences.

Odor Prevention Level Recommendations

As with all King County facilities, it is recommended that the conveyance system network odor prevention level remain at the High/Existing Plant Retrofit level described in Table I. As existing facilities are upgraded or new facilities are built, odor prevention is to be addressed and odor control systems installed that are appropriate for the site. Operations and maintenance activities will be evaluated in the design assessment so that odor prevention is designed into the facility to prevent future nuisance odors.

Requirements to Achieve Recommended Odor Prevention Levels

Each offsite facility is unique and odor prevention must be tailored to the specific requirements of each location in the conveyance system. To achieve a High/Existing Plant Retrofit level of odor prevention, the criteria from Table 1 must be designed into each facility that has the potential for impacting the community with nuisance odors.

Brightwater Treatment Plant Odor Prevention

Historical Perspective

A major component of the RWSP involves the siting, design, and construction of a new regional wastewater treatment system, called Brightwater. The Brightwater treatment system is being built to ensure that our region has sufficient wastewater treatment capacity and will serve the northern portion of King County's wastewater service area. Work is currently underway to site the Brightwater facilities, which includes a treatment plant, its associated conveyance pipelines, and a marine outfall. The Brightwater treatment system is scheduled to be commissioned and operating by 2010.

Odor Prevention Level Recommendations

King County has committed that the new plant will not be a nuisance to its neighbors. The design of the Brightwater facility provides the opportunity to design and implement a program that will represent a level of odor prevention that will be the "best in the country", or "High/New Plant" as described in Table I. Using state-of-the-art odor generation, emission and dispersion prediction tools, appropriate odor control technologies will be selected and

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operational procedures developed to prevent odors from becoming a nuisance to the treatment plant and new conveyance system facility neighbors.

Requirements to Achieve Recommended Odor Prevention Level

As important as the selection of the wastewater treatment process is, so is the selection and development of an odor prevention strategy. Because the detailed design of the Brightwater plant has yet to begin, the details of the odor prevention methods have not been developed. The design and construction of these facilities from the ground up will allow the integration of odor prevention philosophies and measures that are impossible to implement at existing facilities.

To achieve a level of odor prevention that will be considered the "best in the country" (High/New Plant), the following criteria from Table 1 must be met:

- All odorous sources must be contained and foul air evacuated to scrubbers
- Scrubbers will be tuned to treat specific classes of gases at each scrubber stage
- Best management practices must be developed as an integral part of design
- Facilities will be designed not to exceed zero to three dilutions-to-threshold above background odors more than 50 hours per year

Accomplishing these objectives will require that the odor prevention program be developed concurrently with the overall treatment plant design. It must be fully developed so that the odor prevention systems are fully functional before wastewater is allowed to enter the treatment plant. This is already the practice of WTD.

Odor control equipment with redundant systems will be required as part of the overall odor prevention program to achieve the High/New Plant prevention level. Cost estimates will be developed during the design of the new facilities. Operation and maintenance of the odor control systems and odor prevention tasks will require the labor of the treatment plant operators. The time required of personnel to implement the odor prevention program will be assessed and appropriate staffing levels determined. Proper funding of positions must be allocated to assure odor prevention program success.

Odor Prevention Program Success Measurement

The level of nuisance odor impact on a community is only partially represented by the volume of formal odor complaints received. Many more people detect and are annoyed by odors than make the effort to file a complaint. The measurement of odor prevention success must, therefore, use not only odor complaint data but also other measurements to assess adherence to, and the effectiveness of, the program. An odor prevention program must consider not only the generation and final impact of odorous gases on the surrounding community, but also system and facility design, benchmarking against peer utilities, operation and maintenance practices, odor complaint response and investigation, and community relations. Each of these areas must be addressed and methods must be developed to measure and report the consistency of program compliance and effectiveness.

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Peer Utility Benchmarking

It is recommended that King County institute an effort to join with peer utilities and establish benchmarks for odor prevention. Table 2 below compares standards established for wastewater facilities around the country. The plants listed in the table are in locations where topography and meteorology are substantially different from King County's. It would be prudent to establish benchmarks with utilities situated in similar coastal regions that share similar meteorology and topography that influence the dispersion and impact of odors. For instance utilities in Tacoma, Washington; Portland, Oregon; San Francisco, California; and Vancouver, British Columbia could be included. WTD staff are in the process of contacting utilities in these areas to assess the desire to participate in a benchmarking effort and mutual evaluation of peer odor prevention programs.

Wastewater Facility Design

The generation and release of odorous gases from wastewater treatment and conveyance facilities is very dependent on their design. Furthermore, as described in *Wastewater Odor Prevention* document, there are benefits and limitations to the various methods of measurement and odor control technologies. Therefore, it is imperative that each system be evaluated and designed on its own merits. During the design of a facility, the potential for odorous gas generation and release must be evaluated, dispersion of the odors must be estimated based on-site specific meteorology and topography and odor impacts assessed based on the proximity and density of the current and potential future populations. Odor control equipment must be selected and sized appropriately as part of this effort.

The WTD's Odor and Corrosion Control Taskforce is responsible for evaluating designs that may influence odor release. The Taskforce has developed a design standard for odor control systems that is used to lead designers to develop systems that are adequate to prevent nuisance odor impacts. Measurement of compliance with the design standard and the requirement of obtaining Taskforce approval of design will be tracked and evaluated as a measurement of odor prevention program success.

Operation & Maintenance Practices

Operation and maintenance of wastewater processes, equipment and facilities can have significant impacts on the generation and release of odors to the community. Standard operating procedures (SOP) are in use by the WTD but must be reviewed and modified periodically to include activities that will prevent nuisance odors. Review and modification of the current SOP and maintenance practices began during the second quarter of 2002 and will be subjected to periodic reassessment as part of a continuous improvement cycle. Odor abatement plans for potentially odorous operations and maintenance activities will be prepared and followed as part of the SOPs. Periodic review and assessment of how well the SOPs address odor prevention and how well they are implemented will become an odor prevention program measurement of success.

Plant	Surrounding	Threshold	Acceptable Number of
	Land Use		Hours per Year that Can
			Exceed Threshold
East Bay Municipal	Industrial	50 D/T (Phase 1	< 10 hours / year
Utility District	turning into	of odor control)	10 Hours / your
(EBMUD), Oakland,	residential	20 D/T (Phase 2	< 100 hours / year
CA		of odor control)	100 Hours, year
Central Contra Costa	Industrial with	4 D/T	< 100 hours / year
County Sanitary	some	. 2, 1	100 Hours, your
District	residential and		
	highway		
Sacramento County	Rural with	20 D/T	< 100 hours / year
Regional Sanitation	growing		1 0 0 110 m25 , y c m2
District, CA	residential		
Orange County	Residential	20 D/T	< 100 hours / year
Sanitation District, CA	with highway		
Allegheny County	Residential	4 D/T	< 50 hours / year
Sanitation District, PA	with highway		,
City of Philadelphia,	Residential	20 D/T	< 100 hours / year
PA	·		
City of Calgary,	Rural with	20 D/T	< 100 hours / year
Canada	growing		•
	residential		
Yountville, CA	Golf Course	4 D/T	< 100 hours / year

a) Source: Preliminary Baseline Odor Assessment – King County South Treatment, April 8, 2002.

Odor Complaint Response & Investigation

Being a good neighbor by preventing odors is part of the normal operation of WTD's conveyance system and treatment facilities. While there is a possibility for odors to occur, the WTD makes every effort to respond to odor complaints in a prompt and effective manner. King County considers an odor complaint a serious event and has listed odor complaint telephone hotline phone numbers in area phone books under King County Department of Natural Resources and Parks - WTD.

Personnel are available to respond to odor issues 24 hours a day. The odor hotlines connect directly to treatment plant main control offices where complaints are logged and the event is documented. Personnel are dispatched to the location identified by the complainant to investigate within two hours of receiving the complaint. The goals of the investigation are to identify the odor source, repair odor control equipment if necessary and maintain a neighborly relationship with the community. If the originator of the complaint desires, they are notified of the investigation findings.

Each month the Odor Control Taskforce reviews all odor complaints received to determine whether the actions taken in response were appropriate and to initiate further action if required. Prompt disposition and resolution of odor complaints that are the result of the WTD's activities are tracked and will be evaluated as a measure of success of the odor prevention program.

Community Relations

The WTD is actively informing and educating the public about the services it provides while protecting public health and the environment. Staff members inform the community about the processes used in the field of wastewater treatment including odor prevention and control methods used at our facilities.

Community relations staff act as liaisons between the citizens in our region and the WTD, providing assistance to residents, organizations and businesses with complaints, issues or concerns regarding projects, conveyance lines, facilities and other wastewater related issues. Open houses and educational tour programs are conducted to provide citizens the opportunity to learn about the treatment facilities in their neighborhoods. Brochures and other public education documents are available on the Internet to provide additional public information regarding wastewater odor prevention. Planning is currently underway for King County WTD's odor prevention-specific web page.

The annual Department of Natural Resources and Parks Water Quality and Near-Facility-Neighbor Surveys are conducted to assess public sentiments about King County's wastewater treatment facilities and nuisance odor impacts. These surveys are a result of WTD's productivity initiative and are being used to establish a baseline of community sentiment. These surveys will continue to be used to assess the effectiveness of the Community Relations Unit, to determine whether additional work is required, and as an odor prevention program measurement of success.

Technology Assessment

WTD personnel are actively involved in the assessment of new odor prevention and measurement technologies. Members of the Odor and Corrosion Control Taskforce are actively involved in professional organizations such as the Water Environment Federation and remain abreast of developments in the field. If a new technology appears promising, laboratory or pilot tests are conducted to validate the equipment if operating data from field use is not available. Only after positive results are verified will a new technology be introduced as an option for odor prevention.

Measurement of success with this part of the odor prevention program will be to track and maintain data on emerging technologies and the results of technology testing.

Program Implementation

The WTD continues to develop and enhance its efforts to eliminate nuisance odors from its facilities. Work under the RWSP will move the Division to the forefront of odor prevention in the wastewater industry. In meeting the requirements of the RWSP ordinance, WTD has explained and outlined in this document a policy for odor prevention based on defined prevention levels for each of the major conveyance and treatment systems and the methods that will be used to measure the success of the program. Implementation of the program will require resources including capital expenditures and ongoing operation and maintenance costs. Additional personnel will be required to monitor and maintain the new and enhanced odor prevention systems and activities associated with the program.

Upon approval of the odor prevention policy, the WTD will develop a detailed action plan with specific milestones for the implementation of the of the odor prevention program. Those capital improvements described earlier in this document that are not yet under development will be scheduled for implementation. Implementation will be phased to generate the greatest improvements first, balancing benefit gained with cost. A schedule for the improvements has been included in Appendix A and was developed based on balancing the reduction of odor impacts against the potential cost. Odor prevention systems for the Vashon Island treatment plant, Brightwater facility and the associated conveyance systems will be developed concurrently with the design of those facilities.

Conclusions

Odor prevention is a major goal of responsible wastewater utilities and their governing bodies. As reflected in the odor prevention requirements in the RWSP ordinance and Operational Master Plan, King County and the WTD have shown that they are no exception to this rule.

The WTD has addressed the RWSP requirements in this document. The recommended Odor Prevention Policies set broad goals that provide the foundation for a holistic, robust and effective odor prevention program. Such a program will expand the current methods of odor control and place King County's WTD at the forefront of the wastewater industry with regard to odor prevention. The recommended policy specifically states that new regional treatment facilities will be designed to a standard that will represent the best odor prevention systems in the country, and that existing facilities will be configured to provide the best odor prevention possible given the constraints of their existing systems.

The goals for odor prevention at new and existing treatment facilities and for the conveyance system have been stated in this document. Development of the odor prevention goals has included recommendations for modifications to existing systems. Implementation of these modifications will result in the fulfillment of the RWSP requirement to significantly reduce odors from the South Treatment Plant and will decrease impacts from the West Point Treatment Plant as well. Endorsement of the proposed odor prevention policies will provide direction to the WTD to move forward with the odor prevention goals stated in this document.

Table A.2: South Plant Odor Prevention Improvement Recom

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	1	ì					nents &	Odor Red	uction Potential	ed Probable	Costs	
Action	Benefits	Recommendations	implementation Period	FTE Increase	Odor Impacts Avoided ^a	Cost of Odor Impacts Avoided Annually*	Capital	Annuel O&M	Capital			Low
Division channel ventilation improvements	Stops escape of fugilive odors and corrusion of conorsia structure. Rapid corrosion will lead to safety problems and will necessitate expensive corrosion demage rehabilitation	Imperative, Low capital cost of impact evoldance. No FTE increase, Begin design 2003.	24 months		2400	\$2	\$45,000	\$0	Capital	ARRIAGOS.	m Capital	- Autoria
Carbon change in Mobile ador Control units	Reduction in odor impacts due to unplanned carbon seturation and downlime for replacement.	Imperative. Low annual cost of impact avoidance, No FTE required. Implementation can begin impedately.	3 months		4032	\$4	\$0	\$15,000				
Purchase additional Jerome monitors,	Repid troubleshooting of odor problems & data collection of hydrogen suitide concentrations near the human odor detection level.	immediately. Imperative. Low capital & annual cost of impact avoidance. No FTE increase required, implementation can begin immediately.	3 months		1440	\$ 5	\$60,000	\$2,000				
ncrease Bloxide Calcium/Sodium Nitrate) Homical dosing.	Reduces hydrogen suffide (rotten egg) odors. Reduces consumption of consumables in foul air scrubbers and corresion of infrastructure associated with trydrogen suffide.	Imperative. No capital & low annual cost of impect evoldence. No FTE increase. Implementation can begin immediately.	2 months		4032	\$10	\$0	\$40,700				
Washing of treatment process tanks during draining activity.	Reduces odor emissions during tank cleaning. Odor reduction will be algolikcant but intermittent because tank cleaning activity is not a constant process.	imperative. No capital & low annual cost of impact avoidance. FTE increase required, implementation can begin immediately.	3 months	0.4	1560	\$23	\$0	\$30,000				
Optimize wet scrubber themical injection rates,	Maintain maximum foul eir scrubbing efficiency	Imperative. No capital & fow annual cost of impact avoidance. No FTE increase. Implementation can begin immediately.	3 months		2920	\$28	\$ 0	\$80,500				
Addity wet chemical crubbers allowing two rependent liquid sump themistries for the what y treatment and oaks funding scrubber valents.	Maximizes performance of four air scrubbors by allowing adjustment of liquid chemistry appropriate to the four air stream.	Imperative. Significant capital but low exnual cost of impect avoidance. No FTE Increase. Begin design 2003.	36 months		3000	\$36	\$705,900	\$50,000				
ncrease frequency of snce line odor nonitoring.	Provides a check of odor impacts from wastewater processes and foul air scrubbers. Although the reduction is foul air emissions would be sight, the cost is correspondingly low and will result in a reasonable benefit for the investment.	Recommended, Low annual cost of avoiding oder impacts, FTE increase required, implement can begin immediately.	1 month	0.3	600	\$45			\$0	\$27,000		
econdary sedimentation ank mixed Squor line raining.	Reduce odors emitted during referng of tents.	Recommended, Low annual cost of avoiding only a few odor Impacts. FTE increase not regulated, Implement can begin Immediately.	12 months		90	\$45		2		-	\$50,000	\$a
emporary overing/tenting of rocess tanks during naintenance.	Reduces odor emissions during tank cleaning. Odor reduction will be significant but intermittent due to the fact that tank cleaning activity is not a constant process.	Immediately. Recommended, Low capital & armuel cost of impact evoldance. No FTE increase required. Implementation can begin immediately. Optional. Moderate	12 months		468	\$47			\$88,500	\$15,000		
entilation /Foul Air crubber system uspections,	shorter odor emission events by early detection of problems.	Optional Moderale annual cost of impact avoidance. FTE increase required, implementation can begin immediately.	6 months	0.7	576	\$109			\$0	\$63,000		
	Enhanced ability of WTD to monitor and identity locations of high hydrogen suitide concentrations and associated risk of odor emissions and corrosion.	Recommended, Low capital & modernia enrual cost of impact avoidence. No FTE increase, implementation can begin immediately.	3 months		50	\$148		·			\$32,000	\$0
re-Chlorination rate crease.	Reduce strong musty offsite odor impacts.	Recommended, Low annual cost of impact avoidance, Cost estimate based on gaseous chlorine use. Cost increase if sodium hypochlorite used. implementation can begin immediately.	3 months		720	\$153	·		\$0	\$110,000		
estawater liquid phase iffide monitoring for emical injection fustment.	Meximize odor reduction while minimizing chemical injection rates and costs	Recommended, Moderate smusi cost of impact svoidance, FTE increase equired, implementation can begin immediately,	6 months	0.5	288	\$156			\$0	\$46,000		
annels, Evacuate &	Reduce strong musty offsite odor impacts by eliminating escape of untreated foul air.	Optional Low reduction of impacts at high cost of impact avoldance. High ceptal cost. No FTE acquired. Design could segin in 2003 if funding evaluable.	36 months		48	\$2,358					\$1,000,000	\$33,00
san packed tower odor rubber mist eliminator ds monthly instead of nually.	reducing resistance to airflow. Reduces fugifive arrissions from ventilated processes due to restricted airflow, Reduces color emissions from fouted mist	Optional. Low reduction of mpacts at high cost of mpact avoidance. High apital cost. FTE increase equired. Design could legin in 2003 if funding wallable.	3 months	0.2	5	\$3,600					\$0	\$14,00

a) Annualized cost of capital at 5% and OEM.

b) Index developed to assess impact on odor avoidance by implementation of individual improvement. Impact defined as at 5 dilutions-to-threshold for at least 5 minutes c) Odor Reduction Definitions; High > 1000 impacts, 100 impacts < Medium < 1000 impacts, Low < 100 impacts

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