



**Report to the Mayor and City Council  
on  
Odor Control in Milpitas**

January 18, 2011

Prepared by:

Kathleen Phalen, Utility Engineer

**DRAFT**

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## APPENDIX

Odor Control Maintenance-Level Action Plan

## **1. Odor Sources Impacting Milpitas**

The City of Milpitas is adjacent to the Newby Island Sanitary Landfill and Resource Recovery Park and the San Jose/Santa Clara Water Pollution Control Plant, two facilities sited in San Jose that generate odors during the processing of large volumes of municipal organic wastes in an open-air environment. Although these two facilities are not the only sources of odors impacting Milpitas, they are by far the largest processors of decomposable organic waste in this region.

### **1.1 Newby Island Sanitary Landfill and Resource Recovery Park**

Allied Waste/Republic Services owns and operates the Newby Island Landfill and Composting Facility at 1601 Dixon Land Road, adjacent to the City's northwestern border. In addition to the active waste receiving landfill disposal operations, Allied receives a maximum yearly average of 160,680 tons of green yard waste, food waste, and wood waste from Bay Area customers and composts these wastes on an 18-acre open air pad at the far western end of the Newby Island property. Composting biodegrades the organic waste to reduce its volume by about half through the release of carbon dioxide, water, and other metabolic by-products into the atmosphere. The process takes about twelve weeks and is conducted in windrows (long rows of waste piles approximately 10 feet high). To keep the decomposition process from turning anaerobic, the compost windrows are turned and mixed frequently.

### **1.2 San Jose / Santa Clara Water Pollution Control Plant**

The City of San Jose operates the San Jose/ Santa Clara Water Pollution Control Plant at 700 Los Esteros Road adjacent to the City's western border north of State Route 237. The Plant receives an average of 110 million gallons per day of sewage from San Jose, Santa Clara, Milpitas, the West Valley Sanitation District, Cupertino Sanitary District, and several other small sanitary districts and separates this waste into cleaned water for discharge to the Bay and solids for disposal. The solids are largely biodegraded in large, enclosed treatment units called digesters to produce a dilute biosolids stream. Biosolids are then air dried for four years in 770 acres of open sludge lagoons and drying beds located along the City's western border. Each year the Plant produces about 40,000 tons of dried biosolids that Allied collects in late summer or early fall and stockpiles at Newby Island for use as alternate daily cover over the garbage deposited in the landfill.

### **1.3 Other Odor Sources**

Other sources of odor include the City's sewer collection system, landscaping applications of soil amendments such as steer manure or fish emulsion, release of anaerobic decomposition gases from marsh wetlands at low tide, and commercial and private cooking odor. These types of odor impacts are generally of limited duration and range and are typical of many Bay Area suburban communities.

## **2. Odor Regulation**

### **2.1 Regulatory Agencies**

The Bay Area Air Quality Management District (BAAQMD) is a special district of the State of California charged with enforcing air quality regulations in the San Francisco Bay Area. It is the lead agency for investigating odors, with the exception of those from composting operations. Upon receipt of a complaint, BAAQMD sends an investigator to interview the complainant and to locate the odor source if possible. BAAQMD enforces odor control by helping the public document a public nuisance. BAAQMD typically brings a public nuisance court action when there is a significant number of confirmed odor events within a 24-hour period. A finding of public nuisance is punishable by fine.

The State of California delegates regulation of composting facilities to the Local Enforcement Agency (LEA). The San Jose Planning Department Code Enforcement Section is the LEA for the Newby Island compost facility. The LEA issues permits for the facility operations and regularly inspects the facility for permit condition compliance. BAAQMD refers confirmed odor complaints arising from composting operations to the LEA.

### **2.2 Odor Regulations**

Although there are no numerical standards for odors as an air pollutant, the BAAQMD can cite facilities for violating the State of California public nuisance law (Health & Safety Code §41700) which prohibits emissions that cause odors, health problems, property damage or other nuisance. The purpose of the BAAQMD inspector meeting with a complainant is to confirm the source of odor impacting the public so that it can be included in the documentation of a public nuisance. Neither the public, nor city staff can make this confirmation.

## **3. Odor Action Plan**

On October 7, 2003, the City Council held a public hearing to receive testimony about chronic odor episodes within the City. Stakeholders, including members of the community, regulatory agencies, and odor generating facilities, attended this meeting. After receiving public comment, Council directed staff to work with stakeholders to develop and implement an odor action plan. The objective was to reduce odor incidents by obtaining the cooperation and coordination of stakeholders and by simplifying the complaint reporting process. Staff prepared the Odor Action Plan according to the following principles:

- **Centralized Complaints Handling.** Publicize use of the BAAQMD Hotline (1-800-334-6367) to reduce confusion about submitting complaints.
- **Timely Notifications.** Provide rapid feedback to potential sources to allow them to adjust or stop odor generating processes as quickly as possible. Sources identified this as the best way to help them control odors from their sites.

- **Prevention/Oversight Accountability.** Develop and encourage facilities to implement best management practices for each source to yield responsive and effective odor control.

Staff implemented the plan upon Council's acceptance and provided Council quarterly reports for the next four years. In 2007, Council reduced the reporting frequency to once per year and in 2008 reduced it to an as-needed basis. At this time, Council also approved transitioning to a maintenance-level action plan to keep odors at a baseline level. The maintenance plan continues use of the BAAQMD odor line and rapid notification process. The current plan is an appendix to this report.

## **4. Public Odor Complaint Process and Summary of Complaints**

### **4.1 BAAQMD Odor Reporting Process**

Because a public nuisance violation brought by the BAAQMD is the strongest enforcement tool available to the City, it is important that public continue to use the BAAQMD odor reporting complaint line when they are negatively impacted by odors. Neither city staff nor BAAQMD can step in to take over the public complaint/public nuisance violation process on behalf of the public.

The public complaint process is summarized in Figure 1 of the Odor Action Plan attached to this report. When the public is bothered by an offensive odor, they should immediately call the BAAQMD complaint line at 1-800-334-6367, day or night, to describe the type of odor, alleged facility, and duration. BAAQMD keeps the complainant's name and specific location private, but does call the complainant to arrange to meet to attempt to confirm the source of the complaint. If the complainant is willing, the inspector meets him or her at the site of the detected odor and then traces the odor to its source for confirmation. Depending on the inspector's whereabouts, it may take the inspector a half hour or longer to arrive at the complainant's site.

### **4.2 BAAQMD Rapid Notification Process**

Immediately after a complaint is called into the BAAQMD, stakeholders, including the odor source facilities and San Jose and Milpitas staff all receive a computer-generated email describing the odor description, alleged facility, time of incident, and duration. As a best management practice, the facility operators review the complaint, assess their operations and meteorological conditions, and immediately halt or control any operations they are conducting that may be causing the odor.

### **4.3 Confirmed vs. Unconfirmed Odor Complaints**

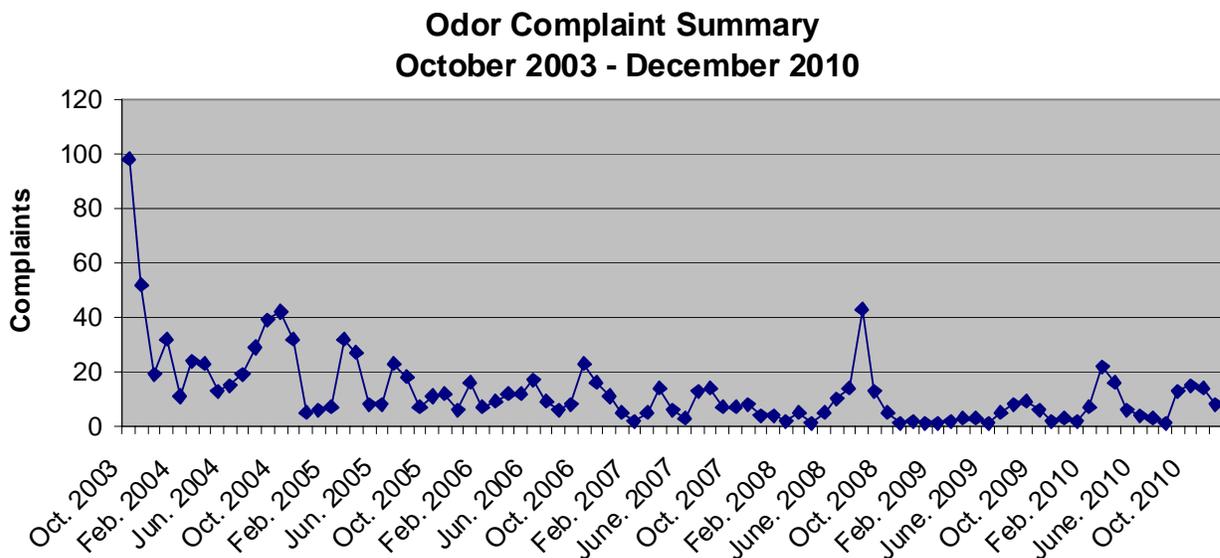
All odor complaints, whether confirmed or unconfirmed, are considered valid reports of the public's impact by odor. Although, the low rate of confirmed odor complaints has been cited as evidence that odors are now satisfactorily mitigated, that is an incorrect use of this data. The BAAQMD odor reporting and rapid notification process is designed to halt odor as soon as possible and so directly reduces the percentage of complaints that can be confirmed to a very low level.

A public complaint is considered unconfirmed until and unless a BAAQMD inspector can confirm it by smelling it with the complainant and then tracing it to its source. Because the purpose of the Rapid Notification Process is to give facility operators immediate feedback about odors that are impacting the community so that they can immediately halt and control actions, only about 1 percent of odor complaints are confirmed. It takes the BAAQMD inspector one-half hour to arrive and the complainant site to start the confirmation process and during this time, the facility should have halting operations and/or wind direction and speed may shift, making impossible to confirm the source.

Neither confirmed nor unconfirmed odor complaint data are statistically valid measurements of odor strength or frequency from any source since the data depend on the public's awareness of the odor and the public's ability and willingness to call in complaints. In addition, unconfirmed odor reports cannot be used to identify the specific source because the public cannot definitively detect and verify the difference between decomposing biosolids and decomposing compost. The public's belief about the odor source may be influenced by their awareness of the facility operations. Most people know about the Newby Island landfill which is open to the public. Fewer people know about the Newby Island composting facility or the Water Pollution Control Plant.

#### 4.4 Summary of Odor Complaints

The BAAQMD has received 1,110 odor complaints from the Milpitas community since the Rapid Notification process started in October 2003. The number of complaints dropped from a high of 284 in 2004 to a low of 43 in 2009. In 2010, the number of complaints rebounded to 110 due to a couple of odor spikes in the late spring and fall. The following chart shows the number of complaints per month. Figure 3 in the Odor Action Plan included in the appendix shows this same data in bar chart format and indicates the facility to which the complaint attributed the source. These data represent unconfirmed complaints.



In general, odor complaints have been highest in the fall (averaging 17 complaints per month) and in the late spring (averaging 13 complaints per month.) Complaints are the lowest in the winter (averaging 7 complaints per month) and early summer (averaging 8 complaints per month). Staff attributes the high rate of complaints in the fall to the annual loading, hauling, and unloading of biosolids from the Water Pollution Control Plant to Newby Island. Other factors influencing the rate of complaints are attributed the meteorological factors including temperature, rain, and wind.

#### 4.5 Publicizing the Odor Complaint Line

Outreach to advise the public of the BAAQMD complaint telephone number and what information to provide includes:

- Flyers placed at public counters
- Announcement on city webpage
- Public Service Announcements – City Media (1510AM, KMLP15 – TV)
- Advertisement in “City Information Pages” of the *Milpitas Yellow Pages*

In 2007, Council directed staff to mail the following post card to all residents in Milpitas. The intent of this card was to provide a handy remind of the BAAQMD complaint line number the public could carry with them in their car or on their person.



#### 5. Next Steps

Staff will continue implementing the Odor Action Plan with the cooperation of the stakeholders. These efforts including publicizing the odor complaint telephone number, tracking monthly rapid response odor complaints, and coordinating with stakeholder to continue best management practice to keep odors at baseline levels.

In addition, staff will continue coordinating with the primary odor generating sources as they embark on major improvement projects that could lead to the end of persistent and recurring odor impacts to the City of Milpitas within the next 15 years.

### **5.1 Newby Island Sanitary Landfill and Resource Recovery Park**

Allied Waste/Republic Services is applying for permits to expand the landfill to keep it operating until approximate 2025. Composting and other recycling operations are expected to continue after landfill closure. In September 2009, City of San Jose circulated a draft environmental impact report for expansion of the landfill and rezoning to bring various recycling activities into zoning compliance. If approved, the final landfill height will increase from 150 to 225 feet. At some time in the next 15 years, the composting pad will need to be moved closer to Milpitas to allow further landfilling at the far western end of the property. Staff is discussing with Allied Waste/Republic best management practices the facility can implement to minimize odor impacts to the City during this interim period and odor after the final landfill closure at or around 2025. Staff expects to bring this further information on this topic to Council as early as in Spring 2011.

### **5.2 San Jose / Santa Clara Water Pollution Control Plant**

San Jose has just completed a Plant Master Plan recommended alternative outlining a \$2 billion, 30 year program to overhaul the Plant treatment units and to make better use of excess Plant lands for economic, social, and environmental purposes. Through a three-year iterative process informed by the advice of the tributary agencies, other stakeholders, a community advisory group, technical advisors, and the general public, San Jose has balanced a number of conflicting technological, financial, and social goals to develop a recommended Master Plan alternative that serves the needs of the community. Based on comments from the community and Milpitas staff, San Jose revised its original plan to postpone the open air biosolids removal to the end the project to conserve cash flow in the early phases and now recommends removing drying beds and greatly reducing the number sludge lagoons in the first phase of work. This action will reduce the Plant's odor impacts to Milpitas and North San Jose as soon as feasibly possible, but no longer than fourteen years, and will contribute to restoration of air quality to a level the impacted community deserves for the unconstrained enjoyment of their property.

On December 14, 2010, San Jose City Council reviewed the Master Plan recommended alternative which shows removal of the 770 acres of open air biosolids as soon as feasible, but in no case no longer than 14 years, and replacing them with mechanical drying. Upon remediation, the former biosolids area will be used for both industrial research & development businesses and environmental wetlands, including trails and potentially a nature museum. San Jose staff will make a similar presentation of the recommended alternative at the January 18, 2011 City of Milpitas Council meeting.

# City of Milpitas

## Odor Control

### Maintenance-Level Action Plan



Prepared May 2008  
Revised January 2011

## **1. INTRODUCTION**

This maintenance-level odor action plan calls for ongoing odor monitoring and provides guidance for responding to excessive odor complaints exceeding baseline benchmarks established during the period of October 2003 to June 2008. The objective is to ensure that odor generators continue to maintain best management practices to keep odor incidents as low as practicable. The plan transitions from the City's 2003 Odor Action Response Plan that reduced odor incidents to a baseline level through active stakeholder coordination. It continues many of the processes outlined the 2003 plan, including use of the Bay Area Air Quality Management District (BAAQMD) rapid notification process. Under this maintenance-level plan, staff will provide Council updates only an as-needed basis and will continue to incorporate administrative changes to the processes and stakeholder contact information current.

## **2. BACKGROUND**

On October 7, 2003, the City Council held a public hearing to receive testimony about chronic odor episodes within the City. Stakeholders, including members of the community, regulatory agencies, and selected facilities attended. After receiving public comment, Council directed staff to work with stakeholders to develop and implement an odor action plan. The objective was to reduce odor incidents by obtaining the cooperation and coordination of stakeholders and by simplifying the complaint reporting process. Staff prepared the Odor Action Plan according to the following principles:

- **Centralized Complaints Handling.** Publicize use of the BAAQMD Hotline (1-800-334-6367) to reduce confusion about how to submit complaints and reduces regulatory duplication.
- **Timely Notifications.** Provide rapid feedback to potential sources about odor events to allow them to adjust or stop their odor generating processes. Sources identified this as the best way to help them control odors from their sites.
- **Prevention/Oversight Accountability.** Develop and implement best management practices for each source to yield responsive and effective odor control.

Staff implemented the plan upon Council's acceptance and provided Council quarterly reports for four years. In 2007, Council reduced the reporting frequency to annual and in 2008 reduced it to an as-needed basis. All other provisions of the action plan continue, including use of the BAAQMD odor line and rapid notification process.

### **2.1 Stakeholders**

Stakeholders are members of the community, regulatory agencies, and potential odor sources working together to reduce the incidences of odor complaints. A history of stakeholder meeting is including in Appendix A.

*Milpitas Community.* Members of the Milpitas community are adversely affected by odors. Odors restrict their enjoyment of the property and negatively impact property

values. It is the duty of the sources and the regulatory community to limit odor incidents to the maximum extent practicable. The community can assist this process by reporting odor incidents in a timely fashion and providing BAAQMD investigators specific information about odors.

*Regulatory Agencies:*

The Bay Area Air Quality Management District (BAAQMD) - BAAQMD is a special district charged with enforcing air quality regulations for stationary sources in the San Francisco Bay Area. It is the lead agency for investigation and control of odors. Upon receipt of a complaint, BAAQMD assigns a control number and sends an investigator to interview the complainant and locate the odor source. BAAQMD enforces when five or more odor events are verified by the investigator within a 24-hour period, and if the odor source site is identified. This process is undergoing a review and may include future revisions. The BAAQMD odor complaint process is shown in Figure 1.

City of San Jose Local Enforcement Agency (LEA) - The 1989 California Integrated Waste Management Act charged Local Enforcement Agencies with monitoring, and enforcing odor emission from composting facilities. The local LEA is the Code Enforcement Section of the Planning Department of the City of San Jose. The LEA is responsible for permitting, inspecting, and enforcing regulations.

California Department of Resources Recycling and Recovery (CalRecycle) – In 2009, CalRecycle replaced the California Integrated Waste Management Board waste management duties for waste management. It oversees the performance of Local Enforcement Agencies (LEAs) and shares permitting and environmental review at landfill, recycling, and compost facilities.

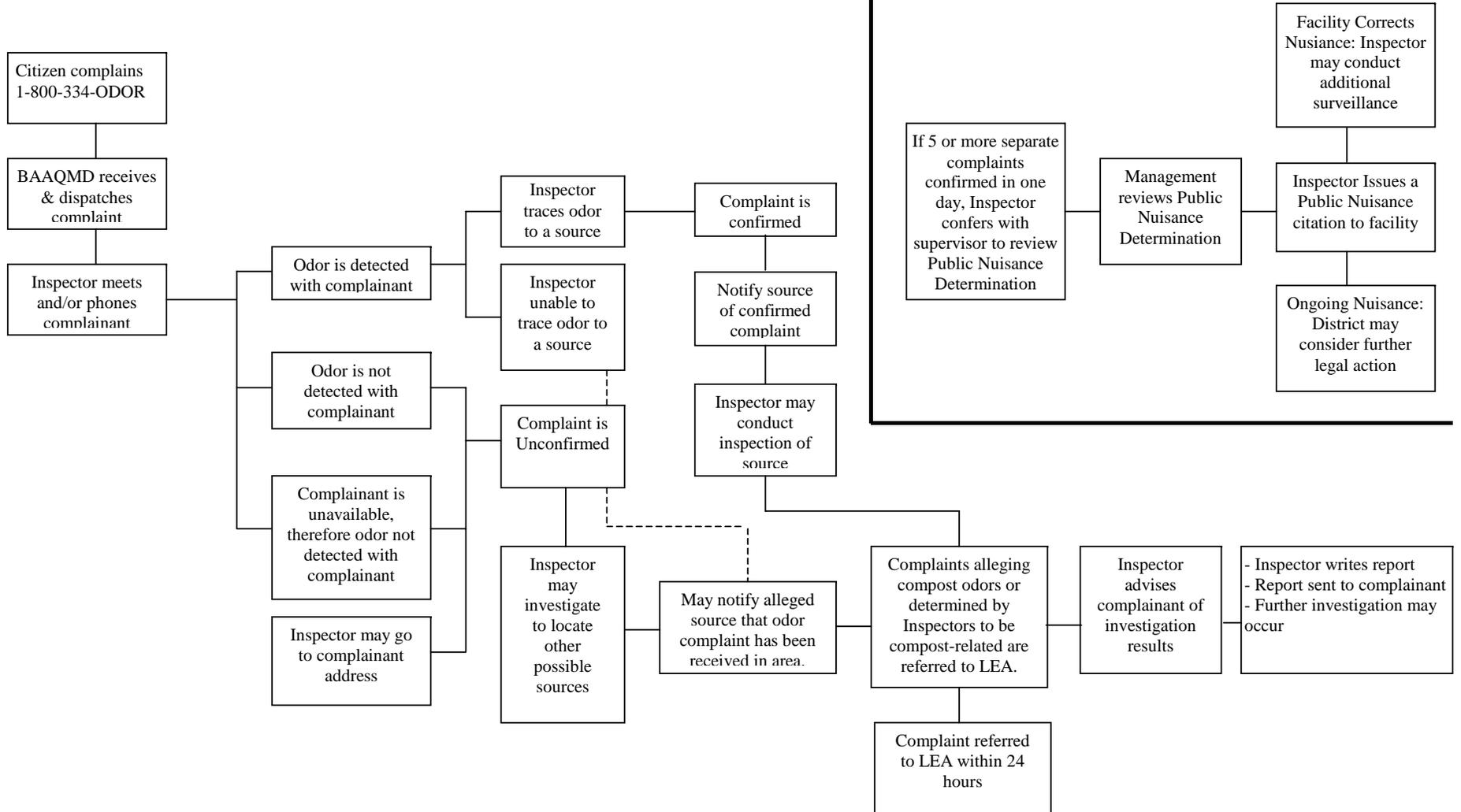
*Potential Sources:* Figure 2 shows locations of potential odor sources. Staff met with representatives from each site to discuss odor sources and methods to control odors.

San Jose/Santa Clara Water Pollution Control Plant (WPCP) – This 55 year-old facility is located at the City's western border. It treats sewage from Milpitas, San Jose, Santa Clara, and other Santa Clara communities. The treatment process separates solids from liquids for treatment and odors are generated in these processes. Solids are treated by anaerobic digestion, stored in open air lagoons for 3 to 4 years, and then air dried in open drying beds before being hauled to the adjacent Newby Island landfill for use as alternative daily cover. Odor controls include the use of chemicals such as chlorine, hydrogen peroxide, ferric chloride, and odor-masking agents. San Jose began a master planning effort in 2008 to guide the reconstruction of the facility over the next 30 years.

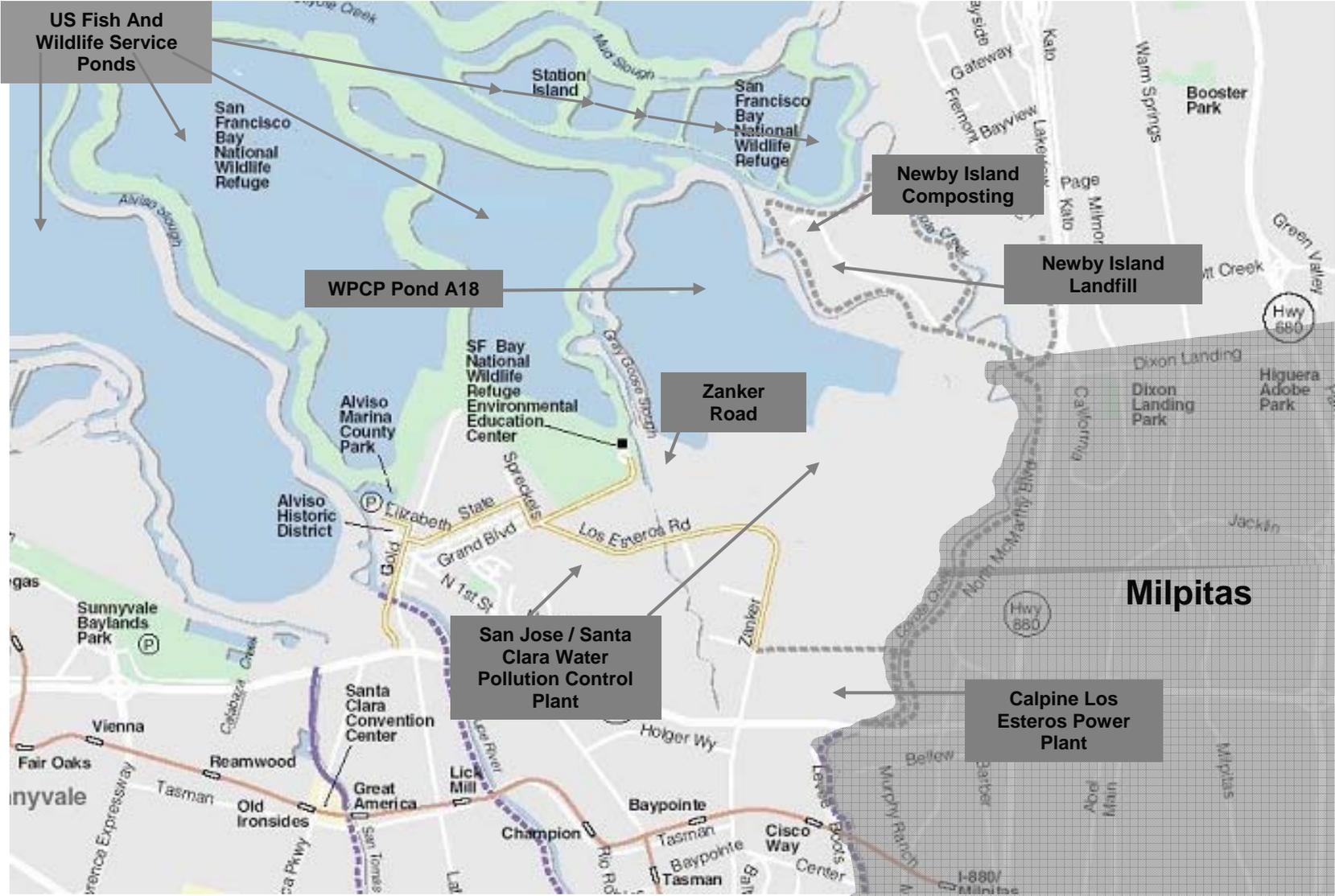
**Figure 1**  
BAAQMD Odor Complaint Process

Current, Typical Milpitas Complaint Process

Typical Odor Public Nuisance Process



**Figure 2**  
Potential Odor Sources Locations



Allied Waste - Compost Facility - This facility, on the west side of the Newby Island Landfill, processes green and food waste into compost by aerobically decomposing the materials over about a 90-day period. Green wastes are shredded and dampened prior to placement in windrows for decomposition. The windrows are aerated mechanically. Food wastes (including organics from the City of Milpitas) are placed into windrows that are covered with fabric and are aerated by means of negative pressure by fans.

Allied Waste – Newby Island Landfill - This landfill, located about one mile west of the City of Milpitas off Dixon Landing Road, was constructed in the 1930's and has an estimated life to 2025. Waste collected from Milpitas and other Bay Area communities is disposed or recycled at this site. The facility covers approximately 350 acres and handles about 845,000 tons of solid waste each year. Disposal is into cells with daily cover applied each evening. Methane and other gases are generated by trash decomposition.

City of Milpitas Sewage Collection System - The City's sewage collection system consists of laterals, sewers and pump stations. Odors are generated from the decomposition of sewage where it is detained and are released with turbulent flow. Such locations include the Main Sewer Pump Station located at the northwest corner of the city. The Main Sewer Lift station is was reconstructed in 2009. During design, a comprehensive odor analysis was conducted that determined that odor control was not warranted.

Zanker Road Landfill/Compost Facility. This facility, located about 1.8 miles to the west of Milpitas, was constructed in 1985 and has an estimated life until 2023. It covers about 70 acres, with 46 acres of permitted disposal and the other 24 acres established as wetlands. Landfilling operations include processing and disposal of nonhazardous, noncompostable, inert mixed wastes, as well as recycling residuals from on-site resource recovery activities. Zanker handles about 300,000 tons of material each year and receives about 100 tons of grass and leaves received for composting in enclosed vessels each day.

This company also operates the neighboring Zanker Materials Processing Facility. This site is 70 acres and also handles about 300,000 tons of material each year. The resource recovery facility processes concrete, demolition debris, wood waste, glass, soil, and yard-waste. There is no composting.

San Francisco Bay. Decomposition of natural organic material occurs in the San Francisco bay wetlands. In windy conditions, marsh sediments can be churned and odors released. Cargill formerly produced commercial salt by evaporating brine in a series of drying ponds on the bay fringe. In 2002, a transfer pump at Cargill Salt Pond A18 failed, resulting in odors from decomposition of pond bottom organic material. BAAQMD issued public nuisance citations. In 2006, San Jose purchase Pond A18 and plans to restore it to natural wetlands as part of its Plant Master Plan land use alternative. Other portions of the Cargill holdings are now part of the South Bay Salt Pond Restoration Project.

## 2.2 Best Management Practices (BMPs)

City staff and regulatory agencies regularly visit potential odor source facilities. Facility staff shared information on their operation and details on odor control practices. The sites have best management practices (BMPs) to control odors. Among the practices noted are:

Allied – Compost Facility. The most significant practice Allied undertook was to move its composting site to the far west of the property to maximize separation from the City of Milpitas. Allied submits an odor minimization plan to the LEA each year. The plan includes odor-monitoring protocols, summary of meteorological conditions affecting migration of odors, and a complaint response procedure. Allied has improved various aspects of the plan over the years, including its rapid response to odor complaints.

Allied – Landfill. The landfill is under contract to the WPCP to accept and beneficially reuse Class A biosolids as alternate daily cover. This transfer is usually conducted in the late summer to early fall when the biosolids are as dry as possible. Allied and WPCP staff monitor a weather station at the WPCP to forecast wind conditions and possible inversion layers which may adversely disperse odors during loading and transportation of the biosolids. Allied and the WPCP found in 2005 that transporting biosolids from the drying beds windrows directly to the landfill without stockpiling reduced odor complaints. Allied has made several other operational changes reducing odor generation and dispersion, including increased monitoring of meteorological conditions at the facility to adjust operations to minimize potential impacts of odor beyond the site boundary.

Water Pollution Control Plant. WPCP implemented a BMP plan which includes extended solids stabilization enclosing process areas and ventilation through scrubbing or dispersion stacks, use of water trucks to control dust and completion of biosolids removal by each afternoon and use of mobile misting neutralizing chemicals. An on-site weather station provides wind speed and direction data, which assists in making operational decisions. The WPCP implemented several changes to its practices to control generation of odors from the sludge drying and hauling operations, including monitoring periods of the year and meteorological conditions that are not conducive to odor dispersion and to dispersion over areas of high population density.

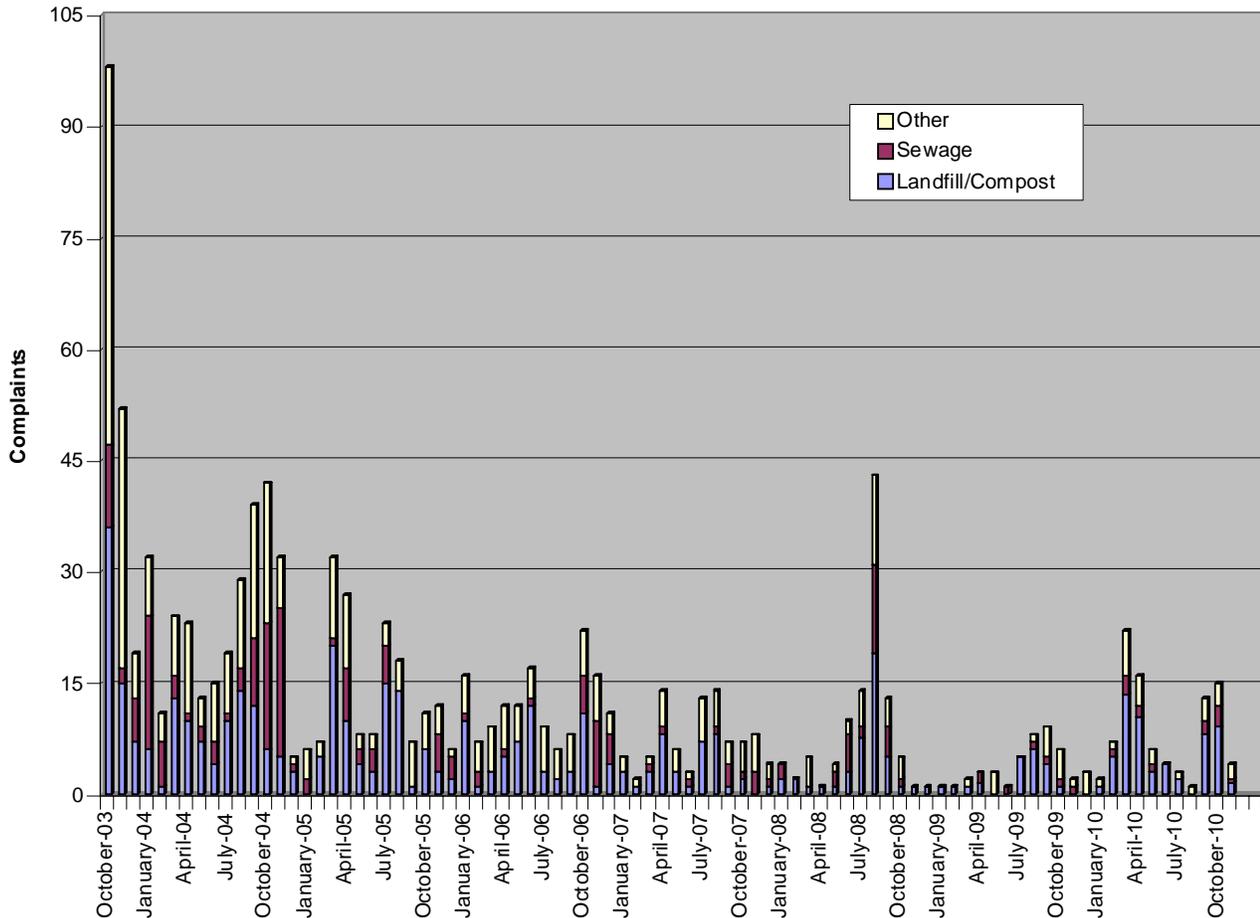
Odor Advice. The City employs a consultant to provide odor management advice. The scope of activities includes as-needed services for the odor outreach program, review of best management practices at potential odor sources, advice on legislative changes, and support at coordination and public sessions.

Additional Meteorological Stations and Monitoring. The City of Milpitas installed meteorological stations at the City's sewage pumping station near the WPCP and Newby Island and the City's Public Works building. These stations allow a better understanding of local weather conditions affecting odor transport and help assess odor incidences. Data from the City's meteorological stations complement meteorological conditions monitored by Allied/BFI at the Newby Island Landfill location and by the WPCP at the wastewater treatment plant.

With the exception of several short duration spikes, odor complaints have generally decreased as shown in Figure 3.

**Figure 3**

**October 2003 - November 2010 Odor Complaint Summary**



### 3. MAINTENANCE LEVEL ODOR ACTION PLAN

The maintenance-level odor action plan consists of on-going verification of proper operation of the rapid notification process and monitoring of alleged complaints to identify situations wherein the action (trigger) benchmarks are reached or exceeded. Components of the Maintenance-Level Odor Action Plan are as follows.

**3.1 Streamlined Complaint Process.** The Bay Area Air Quality Management District reporting hotline will continue as the centralize complaint receipt site. BAAQMD inspectors investigate potential odor sources prior to interviewing complainant. The contact number is 1-800-334-ODOR or 1-800-334-6367. Outreach to advise the public of the number and what to provide is being implemented includes:

- 2007 Odor Reporting Postcard
- Flyers placed at public counters
- Announcement on city webpage
- Public Service Announcements – City Media (1510AM, KMLP15 – TV)
- Advertisement in “City Information Pages” of the *Milpitas Yellow Pages*

**3.2 Rapid Notification Plan.** The rapid notification provides real-time information to regulatory agencies and stakeholders that may correlate to specific plant operations. It gives agencies and stakeholders the opportunity to take proactive steps to mitigate any potential odor impacts. Notifications are also sent to the City of Milpitas and the City of San Jose LEA. Memorandums of understanding to receive complaint notifications have been completed between BAAQMD and Allied, Calpine, Cargill, WPCP and Zanker.

**3.3 Triggers for Significant Incident Response Plan.** Trigger levels of significant odor complaints are defined from experience gained over the past four years about the number of complaints indicating a potentially sustained problem. The triggers are at a level higher than the random baseline and indicate that action is needed to investigate and resolve the cause of odor. The trigger levels lower than regulatory levels because it is prudent to trigger City and facility (source) action before the BAAQMD is obligated to take regulatory action. The benchmarks or trigger levels to invoke the Significant Incident Plan are:

- 3 or more complaints per day from a single reporting location over 2 consecutive days, or
- 16 or more complaints from a single reporting location over a 30-day period.

When either of these trigger levels is exceeded, City staff implement the Significant Incident Response Plan.

**3.4 Significant Incident Response Plan:** The following plan has been developed by CalRecovery, the City’s consultant, to be implemented in the event of a “Significant Odor Incident” (SOI). A SOI is when the frequency or intensity of odor complaints is above the baseline. Such a situation requires review and verification by City staff as follows:

**Preliminary Investigation**

1. Staff contacts potential sources of complaint calls to confirm if the odors are still being observed and alleged source of odors.
2. Staff contacts facility(ies) that are described in call complaints as the alleged sources of the odors to determine if, in the potential source’s, opinion there is a reason for the odor complaints, or if there have been any changes in operations near the time of the complaints that could have been the reason for the odor complaints, etc.
3. Based on the results of the above contacts and a preliminary analysis of the situation, staff will decide if odor frequency indicates that facilities are not

following best management practices (BMPs) and may proceed to the next step of the Plan.

**Notifications.** If staff concludes that BMPs are not being followed, staff notifies the following entities to trigger all or part of the described actions, as appropriate:

1. Public Works Director (PWD) is notified of the observations and premise that triggered the SOI,
2. Alleged Source(s) is notified to implement their response plan (see Attachment 2),
3. Regulatory Agency (BAAQMD and/or LEA) may be contacted to verify their response and follow up investigation status,
4. Consultant may be asked to correlate meteorological and other factors to assist in verifying source(s), and assist as needed.
5. City Council is notified in the City Manager's weekly update that the number of complaints exceeded the benchmark and will be given information about the cause and response.

**Staff Investigation.** If the results of the preliminary investigation are inconclusive, City staff may tour the area of complaints and source(s) in conjunction with affected stakeholders. Depending on the results of this tour, staff and sources implement their contingency plans, as described below. Staff may track and document corrective activities and results and brief PWD (and others as needed) of status.

#### Allied Response Plan

1. Facility receives report of SOI by City Staff.
2. Facility immediately examines operational activities and downloads information from on-site weather station to determine likelihood of being the odor-causing agent.
3. If possible odor-producing agent, facility implements the following options:
  - Immediately suspends the suspected odor-causing activity/operation(s) as allowed by law.
  - Implements odor control measures.
  - Implements additional damage control measures (i.e. drive to the odor incident area to witness the event and/or interview witnesses).
  - Review operation to determine causation and future preventative steps.
  - If unlikely odor-producing agent, facility continues operations but reviews possible odor-generating procedures to preclude potential incidents.
4. In both scenarios, coordination with BAAQMD inspector(s), LEA inspector(s) and City on findings applies.

### WPCP Response Plan

1. Facility (computer room) receives report of SOI by City Staff.
2. Facility staff contact is alerted.
3. Facility immediately examines on-site activities and obtains weather satellite information to determine likelihood of being the odor-causing agent.
4. If possible odor-producing agent, facility implements the following options:
  - Immediately suspends the suspected odor-causing activity/operation(s) as allowed by law.
  - Implements odor control measures (i.e. mister device).
  - Implements additional damage control measures (i.e. drive to odor incident area to witness the event and/or interview witnesses).
  - Review operation to determine causation and future preventive steps.
5. If unlikely odor-producing agent, facility continues operations but reviews possible odor generating procedures to preclude potential incidents.
6. Provide finding to BAAQMD inspector(s), LEA inspector(s), and City on findings.

**Debriefing.** If needed, City staff will conduct debriefing on findings from alleged source and regulatory agencies to determine cause, and develop recommendations to prevent future recurrences.

1. A subsequent session with stakeholders may be conducted to share information and update plans to minimize future episodes.
2. All findings, actions and recommendations to be filed for use during any subsequent episodes.

# Odor Reporting Process



The Bay Area Air Quality Management District  
is the regional agency that investigates odor complaints.

If you detect an odor, please call:

**(800) 334-ODOR**  
( 6 3 6 7 )

Use this hotline to report an odor at any time.  
Be sure to call immediately so inspectors may begin tracing the odor.

Printed on 80% Post Consumer Recycled Paper

# Odor Reporting Process

When logging an incident, try describing an odor as something similar:

- Rotten eggs
- Burning asphalt
- Sewage
- Compost
- Garbage
- Oily
- Musty
- Metallic
- Light or heavy

Other useful descriptions are whether the odor is fleeting but recurring, or constant for longer periods.

**(800) 334-6367**

City of Milpitas  
Utility Engineering  
455 E. Calaveras Blvd.  
Milpitas, CA 95035

PSRT STD  
U.S. POSTAGE PAID  
MILPITAS, CA  
PERMIT NO. 4

MILPITAS RESIDENT

***Important Odor Reporting Information!***  
***Keep this handy card in your car to report an odor complaint while out and about.***

