# Guideline

**Environmental Protection Act 1994** 

# **Odour Impact Assessment from Developments**

The purpose of this document is to provide information on odour impact assessment from developments under the Environmental Protection Act 1994.

# **Executive Summary**

Noxious or offensive odours are a frequent cause for complaint by the community and may cause environmental nuisance. Nuisance odour emissions from a facility may create a poor perception of its activities in the local community, sour the facility's relations with the community and may make it unwelcome in the community. Potential odour impacts are best identified at the planning stage and addressed prior to the commencement of operations.

Proponents of new developments or modifications to existing facilities that may give rise to noxious or offensive odours need to determine the sensitivity of the receiving environment to such odours and demonstrate the use of best practice environmental management techniques to manage odours. The outcome required by the Department of Environment, Science and Innovation (DESI), and as typically set out in its concurrence conditions for development approvals, is that any release of noxious or offensive odours will not cause a nuisance at any odour sensitive place.

Accordingly, proponents are advised that a well-planned proposal must ensure compatibility with adjacent land uses, allow adequate separation distances for process upsets, adopt the principles of waste minimisation, cleaner production and best practice control technology, and minimise or eliminate the potential for odour release. This document provides guidance to proponents, government agencies and the general public on assessing the impact of residual odorous sources from new facilities.

The guideline sets out various approaches to assess potential impacts from new development proposals. Wherever possible, the odour emission record of the facility (in the case of modifications) or industry type should be included in the assessment along with any practical experience in using odour management techniques. Tools such as odour field surveys, odour diaries, complaints data and compliance history, which provide additional relevant information for assessing the impact of odour from modifications to existing facilities, are also discussed in this guideline.

Guidance is provided on the use of air dispersion modelling as a tool to predict ground level odour concentrations. Comparison can be made with guideline values to determine the likelihood of adverse odour impacts. Alternatively, an industry or facility-specific odour intensity approach may be used to assess the likelihood of odour impacts. A practical example of this is the approach of the Queensland Department of Agriculture and Fisheries for piggery facilities. Guidance is also provided for circumstances where odour is due to an individual compound.

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Version	Date	Description of changes
1.00	20 July 2004	First published.
2.00	30 April 2013	Updated odour impact assessment criterion for multiple sources.
3.00	19 April 2024	Updated air dispersion modelling section and various document references.

# 1 Introduction

This guideline provides proponents, government agencies and the public generally with a procedure for assessing the likelihood of odour nuisance from development proposals for new facilities, modifications of existing facilities and land developments. The information provided in the guideline can also be used in developing planning schemes.

The guideline sets out various approaches to assess potential impacts from new development proposals. Odour impact assessment criteria for the mixture of odorants and dispersion modelling techniques are the main focus of this guideline. Tools such as odour field surveys, odour annoyance surveys, odour diaries, complaints data and compliance history, which provide additional relevant information for assessing the impact of odour from modifications to existing facilities, are also discussed in this guideline. Recognition is made in the guideline of industry specific guidelines developed by the Queensland Department of Agriculture and Fisheries as an appropriate method for assessing and managing odour impacts from such industries.

A well-planned proposal must ensure compatibility with adjacent land uses, allow adequate separation distances for process upsets, adopt the principles of waste minimisation, cleaner production and best practice control technology and minimise or eliminate the release of odours from the site. Accordingly, it should only be necessary to assess the impact of residual odours released from the proposed activity. Wherever possible, the odour emission record of the facility (in the case of modifications) or industry type should be included in the assessment along with any practical experience in using odour management techniques.

# 2 Legislative context

It is important to consider the legislative context when following this procedural guide. The object of the *Environmental Protection Act 1994* is to protect Queensland's environment while allowing for development that improves the total quality of life, both now and in the future, in a way that maintains the ecological processes on which life depends ("ecologically sustainable development" - ESD). The Act requires all people who are given power under this Act, to use that power to protect the Queensland environment and do so consistent with the principles of ESD.

Applications must be supported by enough information to enable the administering authority to make a decision. In making its decision, the administering authority is required to comply with Environmental Protection Policy requirements and consider the information provided, standard criteria and applicant suitability. The guideline is chiefly designed to assist applicants for environmental authorities and development approvals for environmentally relevant activities but may also be used for other activities not subject to these specific approval requirements, such as proposed land developments that may be affected by existing facilities that have odour emissions.

Under the *Environmental Protection Act 1994*, proposals are assessed to ensure they will not adversely affect environmental values including air quality, public amenity and safety. In essence, this means ensuring the proposal, if implemented, is not likely to cause environmental nuisance or environmental harm. The definition of environmental harm under the *Environmental Protection Act 1994* includes environmental nuisance. Odour impacts are a frequent and significant cause of environmental nuisance. The Act places a general environmental duty on a person carrying out an activity that causes, or is likely to cause, environmental harm to take all reasonable and practicable measures to prevent or minimise the harm.

The legislative framework for environmental management in Queensland includes:

• The Environmental Protection Act 1994 giving general provisions and recommendations;

- The *Environmental Protection (Air) Policy 2019* prescribing environmental values, air quality objectives and air management hierarchy;
- The Waste Reduction and Recycling Act 2011 requiring consideration of relevant matters including the waste management hierarchy, polluter pays principle and emission controls;
- Environmental Protection Regulation 2019; and
- Environmental guidelines, not legally binding but serving to help industry improve environmental performance.

The *Environmental Protection (Air) Policy 2019* which commenced in September 2019, specified management hierarchy for air emissions. This requires management measures in the order of preference as: avoid, recycle, minimise and manage air emissions. The Policy prescribed odour prevention goals in Schedule 1 for ambient concentrations of carbon disulfide, hydrogen sulphide, toluene, styrene and tetrachloroethylene. The Queensland's *Environmental Protection (Air) Policy 2019* does not provide guidance on odour impact assessment of complex mixtures of pollutants.

The *Environmental Protection Act 1994* includes a range of mechanisms for managing odours, including environmental evaluations, environmental audits, environmental protection orders and transitional environmental programs. The means of determining whether odour from a release to the atmosphere could cause an unreasonable interference with a person's enjoyment of a place also includes on special evidentiary provisions where an authorised person may form an opinion on the basis of that person's own senses.

The assessment of the risk of odour nuisance is an applicable environmental impact study, assessment or report and is therefore one of the 'standard criteria' that must be considered when developments are assessed under the *Environmental Protection Act 1994*. Other relevant criteria include the principles of ecologically sustainable development, planning frameworks, the character resilience and values of the receiving environment, best practice environmental management for the activity, financial implications as they relate to the industry or activity and the public interest. Conditions of developments must be necessary or desirable in achieving the object of the Act. They may include prescribed environmental outcomes, stated measures to minimise likelihood of environmental harm and monitoring programs.

# 3 Human perception of odour leading to annoyance and nuisance

Humans, like many other animals, have evolved with a sense of smell that gives them the advantage of being able to assess their environment rapidly and with a high degree of sensitivity. Humans can describe the perception of an odour stimulus in terms of its detectability, intensity, pleasantness and character. However, the human brain processes the signal from the odour stimulus in combination with information it is receiving from other environmental stimuli and with reference information that it has stored regarding previous experiences and associations. The result of this broader cognitive appraisal is what determines an individual person's unique behaviour in response to a perceived smell.

The sensory perception of odours can be characterised by four major attributes or dimensions:

- Detectability (or odour threshold) refers to the minimum concentration of odorant stimulus necessary for detection in some specified percentage of the test population. The odour concentration of a sample can be characterised by the number of dilutions to reach this detection threshold. Odour concentration is the most common attribute used to quantify odours.
- 2. Intensity refers to the perceived strength or magnitude of the odour sensation. Intensity increases linearly with the logarithm of the odour concentration. Odour intensity is assessed on a seven-point intensity scale from no odour to extremely strong odour.

- 3. Hedonic tone is a judgement of the relative pleasantness or unpleasantness of an odour. It is assessed on a nine-point hedonic tone scale from very pleasant to offensive.
- 4. Odour quality is simply a qualitative description of what the odour smells like.

The term annoyance is used to describe the complex set of reactions that a person experiences as a result of an immediate exposure to an unpleasant odour which if continued and the person cannot avoid it, causes that person to suffer stress.

Most odours, even those that are commonly identified as pleasant, for example, coffee-roasting odours can cause annoyance when they are intermittently clearly detectable.

The term nuisance is used to describe the cumulative effect on people caused by repeated events of annoyance over an extended period of time. Nuisance results when people are affected by an odour they can perceive in their living environment, at home, at work, or during recreational activities, and

- the appraisal of the odour is negative;
- the perception occurs repeatedly;
- it is difficult to avoid perception of the odour; and
- people believe that the odour has a negative effect on their well-being.

People's perception of odour is closely tied to the way they value their environment. Attitudes towards the source, the inevitability of the exposure and the aesthetic expectations regarding their environment are some of the less tangible factors relevant to the probability of experiencing nuisance.

Prior exposure to the odorant can have two effects: (1) adaptation where the perceived odour intensity decreases on exposure and (2) sensitisation where the perceived intensity increases on repeated exposure. Once an environmental odour becomes a nuisance it is difficult to reverse the process. What used to be a faint odour become a signal for annoyance and the person or community affected becomes sensitised to the particular odour.

Concentrations of the chemical constituents of ambient odour are usually too low to cause direct effects on human health. However, an affected community may associate exposure to offensive odours and health impacts to the extent that health effects become real. People may experience undesirable reactions such as unease, irritation, discomfort, anger, depression, nausea, headaches or vomiting on prolonged exposure to offensive odours. Thus, it is not always possible to make a clear distinction between nuisance and health impacts. For the purposes of this guideline, odour impact is assessed only in terms of annoyance and nuisance effects.

# 4 Approaches to odour impact assessment

There is general agreement in the scientific community that frequency, intensity, duration, offensiveness and location (FIDOL) are factors that ought to be considered when attempting to judge the likelihood of odour nuisance. These so called FIDOL factors are not easy to quantify individually, let alone when they interact. It is therefore not possible to develop criteria that set a "pass" or "fail" benchmark for air dispersion model odour estimates, rather guidance can be derived from the estimates on likely impacts which can then be further refined through consideration of such things as the observed impacts of similar facilities, the sensitivity of the receiving community and "offensiveness" of the odours likely to be emitted. Proponents must first ensure that their proposals incorporate best practice environmental technology to minimise odours in a manner consistent with the management hierarchy under the EPP (Air).

Odour impact assessments need to reflect the levels of exposure that result in nuisance in communities affected by the odour impact. The odour impact assessment for a new facility or for modifications to an existing facility needs to be conducted for the purposes of achieving an environmental outcome, which meets a typical environmental authority condition for odour such as:

"There must be no release of noxious or offensive odours or any other noxious or offensive airborne contaminants beyond the boundary of the site that causes environmental harm at any odour sensitive place."

Odour sensitive places include residences, schools, hospitals, caravan parks, national parks, shops and business premises that may be affected by odour. Noxious odours are harmful or injurious to health or physical well-being. An example is gaseous ammonia. Offensive odours are those that cause unreasonable offence, displeasure, are unreasonably disagreeable to the senses or are disgusting, nauseous or repulsive. These are typically though not universally complex mixtures. Whether an odour is unreasonable is determined subjectively taking into account the FIDOL factors mentioned above. Note that such a condition allows the licensee autonomy in how to achieve the objective.

# 4.1 New facilities and modifications to existing facilities

The following provides guidance to proponents of developments of existing facilities and of new facilities to assist in assessing and managing potential odour impacts.

# 4.1.1 Existing facilities

For proposed modifications to an existing facility, proponents should review its complaints data to assist in determining the likely impacts of the modifications on complaint frequency. The experience of industries with similar discharges should also be drawn upon to identify proven odour management practices. Proponents are also encouraged to consult with local community members to ascertain if there are any chronic odour impacts in the community. Techniques such as odour intensity, field odour surveys, odour annoyance surveys and odour diaries may also be of assistance in determining likely impacts from the modifications. Further details are provided in Appendix A.

Atmospheric dispersion modelling may assist in predicting potential impacts from modifications to an existing facility; however community feedback on existing operations should be given greater weight than modelling estimates of the same. In particular modelling should not be used to explain away adverse community feedback. Dispersion modelling may be used to identify sources of odours at a facility and to estimate relevant contributions of the sources. This information may be used to prioritise problem sources and develop cost effective odour source control strategies.

# 4.1.2 Proposed facilities

Site-specific complaint data and community response information is not available to ascertain the potential impact of a new facility. While it may be possible to draw on the past experience of similar facilities, particularly for facilities likely to have low impacts and where odour management practices are well established, odour dispersion modelling provides a framework to estimate potential odour impacts and, if required, identify opportunities for odour reduction. It is noted that odour impact assessment using dispersion modelling rarely goes beyond simply quantifying odour concentrations, estimating the duration of time for which those concentrations are exceeded over a period of a year and comparing them to impact assessment criterion written in similar format. Odour concentrations and the frequency with which they are exceeded at a particular sensitive receptor are conveniently calculated from air dispersion modelling.

# 4.2 Modelling and guideline approaches

Modelling is usually carried out for one-hour time steps as the meteorological data inputs are in one-hour sets. However, the human perception of odour occurs over much shorter time scales. The difference in perception and the odour dispersion modelling output may be accommodated by applying 'peak-to-mean' factors to the modelled odour concentrations, however, the variations in 'peak-to-mean' factors for different sources need to be considered when model outputs are interpreted.

Odour impact assessment guidelines are most often expressed as a modelled hourly average odour concentration for more than 99.5 percent of the (hourly) meteorological conditions in a year. Modelled concentrations can be scaled-up using peak-to-mean factors to estimate the short-term peak concentrations, which may be important for annoyance in humans. It should be noted that 99.5th percentile value (or 0.5 percent allowance) is a statistical parameter to filter the extreme values generated by modelling and not meant to be interpreted as allowing nuisance or failure of emission controls for 44 hours per year (or 0.5 percent of the time).

Odour impact assessment guidelines are usually set on the basis of:

- an assumed general annoyance level, which in this guideline is taken to be 5 odour units at nose response times; or
- the concentration of odour corresponding to a perceived intensity level, which in this guideline is taken to be 'weak'; or
- a community odour survey to measure the population annoyance.

A number of studies have been reported in European countries where odour annoyance surveys have been conducted in communities affected by odour impacts and combined with dispersion modelling of the sources of odour. The logarithm of certain percentiles of the modelled odour exposure concentration are found to be good predictors of the percentage of highly annoyed people. Miedema et al. (2000) conducted a study in Netherlands incorporating pleasantness of the odour as a predictor of odour annoyance. This epidemiological approach is the most appropriate tool for linking the odour emissions from a source, the dispersion characteristics of a site and the long-term effects on the population in terms of annoyance. This type of study, if more widely available, would provide a sound and less uncertain basis for setting odour impact assessment guidelines.

# 5 Odour impact assessment criteria

The following guidance is provided to assist proponents conducting odour impact assessments for new facilities and modifications to existing facilities:

# 5.1 Assessment for complex mixtures of odorants

For the assessment of complex mixture of odorants, the following guidelines are recommended. The odour concentration criterion must be used for new facilities that may generate odour impacts. However, the alternative tools discussed in this section and "Appendix A" may also be used to assess proposals for the expansion of existing facilities.

#### 5.1.1 Odour concentration criterion

The steps followed in setting a concentration criterion for complex mixture of odorants are as follows:

Step1: Define an ambient odour concentration that represents an annoyance threshold. This is the minimum concentration at which the odour will cause annoyance.

Step2: Scale this concentration down by a peak to mean ratio that accounts for the fact that the concentration is predicted using a dispersion model relates to a 1-hour average.

Step3: Define a percentile value that allows for a small level of exceedance (e.g. 0.5 percent of times the predicted concentrations is above the annoyance threshold).

In practice, the character of a particular odour can only be judged by the receiver's reaction to it, and preferable only compared to another odour of similar characteristics under similar conditions. Based on the literature available, the level at which an odour is perceived to be a nuisance can range from 2 to 10 ou depending on a combination of factors including: source characteristics, odour quality, population sensitivity, background level, public expectations and health effects. In this guideline, the odour concentration criterion is based on the default annoyance threshold of 5 ou, and conservative default peak to mean ratios 10:1 for wake-free stacks and 2:1 for ground-level sources or wake-affected stacks.

Proponents of new facilities may undertake an impact assessment with relevant inputs of emissions and local meteorology to an air dispersion model to provide estimates of the likely odour impacts in the surrounding environment. The inputs should be as detailed as possible, reflecting any variation of emissions with time and including at least a full year of representative hourly meteorological data. The modelled odour concentrations at the "most exposed existing or likely future off-site sensitive receptors" should be compared with the following guideline values.

- 0.5 ou, 1-hour average, 99.5th percentile for wake-free stacks;
- 2.5 ou, 1-hour average, 99.5th percentile for ground-level sources and wake-affected stacks; and
- for facilities that do not operate continuously, the 99.5th percentile must be applied to the actual hours of operation.

In adopting a one-hour average criteria, which simplifies dispersion modelling, it is considered necessary to distinguish essentially ground level sources and stacks. This is because the peak to mean ratios in each case and hence concentration fluctuations over the hour are expected to vary significantly and thus dual criteria are considered the fairest approach. In the future if more reliably defined peak to mean ratios are available, then DESI will refine guidelines in the light of generally accepted research findings. Note that it is generally accepted that if a stack complies with the criteria in the USEPA Good Engineering Practice (1985) guidance (that is 2.5 times higher than any nearby building) then building downwash is unlikely to occur (i.e. wake-free stacks).

These guideline values should not be used as "pass" or "fail" test as there are a number of limitations in modelling. Sources of uncertainty include odour sources underestimated or over-looked, short-term peak emissions such as turning a compost windrow not catered for in the guideline, the guideline not being stringent enough for specific substances of greater offensiveness, variability in emission rates, models underpredicting actual concentrations and use of peak to mean ratios too low for actual dispersion. However if the modelled odour concentrations at the "most exposed existing or likely future off-site sensitive receptors" are less than the guideline values then adverse chronic odour impacts are not likely in most cases. If the processes generating odours are variable, or are likely to have "upsets", community responses after the facility starts operations may be adverse even though modelled outputs indicate that emissions should be acceptable.

Similarly, odorous emissions that are extremely offensive, such as some mercaptans may also cause odour impacts with emissions lower than the guideline value. Conversely, modelled values higher than the guideline values do not necessarily mean that adverse community responses will occur. A less offensive odour or an environment that is less sensitive to the type of odour being emitted, for example a usual agricultural odour in a rural area, may not give rise to environmental nuisance.

Research of odour impacts of similar facilities will help provide information on impacts and reduce the uncertainties. Also, if a proponent assembles a body of data that demonstrates to the satisfaction of DESI that different values would more accurately represent a particular situation, the following factors could be modified in developing a site-specific guideline:

- odour annoyance threshold;
- worst case peak-to-mean factor;
- size of building or other wake effects; and
- percent compliance acceptable to the receptor community.

Regardless of the modelled odour emissions, it is in the interests of the proponent to plan to reduce emissions of odour to the absolute minimum and to carefully consider the likely impact of any residual odour emissions in the context of the local community. The local community may have little tolerance for odour nuisance which could lead to imposition of transitional environmental programs, and possible expensive retro-fitting of control equipment.

# 5.1.2 Alternative assessment tools

Alternatively, DESI will accept an assessment of odour impacts from the sources using the tools discussed in Appendix A. These tools can be used for assessing the current status of odour impacts from existing industries that may wish to expand. Impact from an existing facility can be more realistically assessed using these tools in preference to relying solely on dispersion modelling. Once the survey is conducted to establish the current odour status of an existing facility, a site-specific odour assessment criterion can be developed for the expansion of this facility. Odour dispersion modelling should not be used to try to prove the absence of an adverse effect from an existing facility when community data, such as complaint records, are already available to demonstrate the current level of effect.

# 5.2 Assessment for individual odorous pollutants

Odour impact assessments for individual odorous pollutants may be carried out in a similar way to those for complex mixtures of odorants using an air dispersion model with inputs of estimated emissions and meteorological data as described above. The odour impact assessment guidelines in this case can be similarly based on odour detection thresholds. The difficulty is that reported odour detection thresholds of individual chemical species may vary by several orders of magnitude; it may not be clear whether reported values are detection or recognition thresholds; and the methods and reliability of the determinations may be unknown. Nevertheless, odour impact assessment guidelines for individual specific odorants may be drawn from a number of sources including:

- Queensland *Environmental Protection Policy (Air) 2019* for the odorants: hydrogen sulphide, carbon disulfide, styrene, formaldehyde, tetrachloroethylene and toluene.
- Preferably, reported odour threshold data that have been reliably determined in recent years using dynamic dilution olfactometer techniques.

The Queensland EPP (Air) criteria for above odorants are 30-minute average concentrations. Care must be taken in converting one average hour modelling results to 30-minute average that the assumptions underlying the conversion algorithm apply in the specific case.

# 5.3 Step-wise procedure

Proposed development applications, whether for new or existing facilities, are assessed against the "standard criteria" of the *Environmental Protection Act 1994*. Proponents must demonstrate the use of best practice

environmental management. Following the air management hierarchy under the *Environmental Protection Policy (Air) 2019*, this would include adopting the following measures, wherever reasonable and practicable, in the following order of preference:

- Using management techniques to avoid creation of odours e.g. using less odorous materials, managing the process to avoid generation of malodours;
- Reusing or recycling the air emissions in another industrial process e.g. using vapour recovery technologies in refineries, using biogas as fuel;
- Minimising the creation of odours and using technology, materials or industrial processes that minimise air emissions;
- As a last resort, relying on buffer zones, winds and stacks to disperse emitted odours and treating air emissions before release using the best practice pollution control technologies.

Note that masking agents have not been included in the examples as they are not usually an effective management technique to control odours as opposed to technologies that chemically change the odours to make them less offensive. Once the proposed development has been designed to operate in accordance with industry codes of practice or other relevant best practices, an assessment of the impact of any residual odour emissions in the surrounding environment can be made.

The assessment methodology uses an air dispersion model with inputs of information on odour emissions, local terrain and local meteorology to predict ground-level concentrations of odour in the surrounding environment and compares them to odour impact assessment guidelines to indicate the likelihood of odour nuisance in the local community. A flow diagram showing the main steps of the odour assessment is given in Figure 1.

If the proposed facility or expansion of an existing facility, is designed for "best practice environmental management" (Section 21, *Environmental Protection Act 1994*), the recommended buffer distances (Section 6.6 of this guidelines) are met, has no complaint history of this type of industry and the nature of the discharge or emission is insignificant, then no further assessment of odour is required. If the above guidelines are not met, the proponent needs to undertake an odour impact study in accordance with the procedure as outlined in the following sections. Proposals for sensitive land use developments near existing odour sources will also need to make an assessment of impact from the nearby source.

Air dispersion modelling is the method most widely used by consulting organisations for odour impact assessment of proposed developments. Alternative assessment tools including compliance records, complaint data, odour diaries and odour surveys are more appropriate for assessing the current level of impact of existing activities when community data are already available. Odour dispersion modelling can then be used to assess incremental impacts. The following stepwise procedure may be followed when assessing the odour impact from a proposed new facility or a modification to an existing facility.

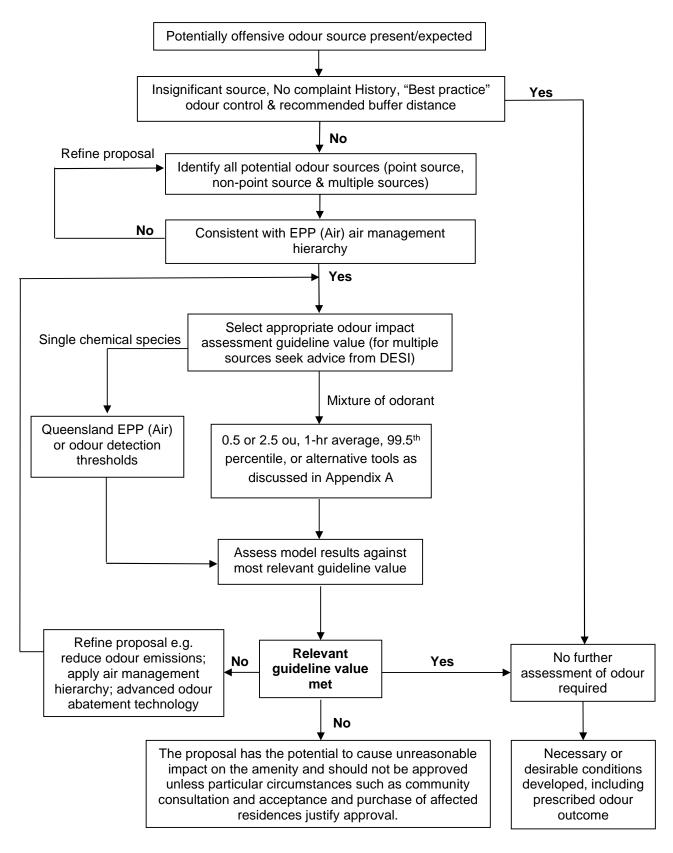


Figure 1. Odour assessment flowchart for new developments.

#### Step 1. Identify and list all potential odour sources

Odour sources can be continuous or intermittent, point sources (for example chimneys, stacks or building vent/exhaust pipes), area sources (for example stockpiles, ponds or open-topped tanks) or volume sources (for example, a building with many openings from which odour escapes). Include all sources within the site boundary and any nearby sources beyond the boundary if it is possible they could contribute to cumulative odour impacts. It is important to include fugitive sources as these often make an important contribution to the odour impacts.

For each source determine its location and elevation relative to a fixed origin and determine its geometry and release characteristics, such as:

- For point sources determine, stack height, stack diameter, stack temperature and exit velocity.
- For non-point area sources, determine surface area, side length and release height.
- For non-point volume sources, determine release height and initial horizontal and vertical spreads.
- To account for building wake effects, determine the location and dimensions of buildings within a distance of 10\*L from each source, where L is the lesser of the height or width of the building.

In the case where a facility has multiple sources with varying odour characteristics, the assessment can often be simplified by considering the sources with the predominant odour, that is, the source with the largest proportional contribution to the concentration at the receptor location in question or the source that emits odour with the steepest intensity versus concentration curve.

#### Step 2. Estimate odour emission rates

For new developments, where possible, estimates of odour emission rates should be based on actual odour measurements on samples taken from similar facilities, either full-scale facilities operating elsewhere, or experimental or demonstration-scale facilities. Where this is not possible, use published emission factors and/or data supplied by manufacturers of process and control equipment.

For non-point area sources, include any information on the influence of meteorological factors such as wind speed and ambient temperature on emission rates. Where available, include information on diurnal, weekly and seasonal variations in emission rates.

Identify 'worst case' emissions that may occur at start-up, shutdown or during other 'upset' operating conditions. If these emissions are significantly higher than those for normal operations, it will be necessary to evaluate the worst-case odour impact, as a separate exercise to determine whether the planned buffer distance(s) between the facility and neighbouring sensitive receptors will be adequate.

All the emissions data and emissions factors gathered for use in the impact assessment should be traceable to the currently recommended standards for odour sampling and measurement, namely, the Australian and New Zealand Standard AS/NZS 4323.3:2001, Stationary source emissions - Determination of odour concentration by dynamic olfactometry. Historic odour data, based on other than AS/NZS 4323.3:2001 standard, are likely to be inconsistent with that obtained using current sampling and measurement standards. Any historical odour concentration data used by proponents in impact assessments should be supported by experimentally determined relationships between the methodology used and that of AS/NZS 4323.3:2001.

For individual odorous compounds determine mass emission rates in grams per second; for complex mixtures determine emission rates in ou.m3/s.

In assessing the impact of a proposed facility, there will be some value in assessing impacts of alternative design scenarios, for example, by:

- varying source release parameters
- enclosing potential sources
- varying process inputs to less odorous compounds
- using aerobic systems instead of anaerobic systems
- providing backup control equipment, for example, pumps and filters
- purchasing buffer zones
- reviewing facility locations to minimise valley drainage aspects
- establishing a community consultation committee
- undertaking lifecycle assessment of process
- enclosing odorous operations and venting to control equipment
- reviewing the efficiency of control equipment
- reviewing management practices
- developing an environmental management system for the facility.

Results can be used to select the most cost-effective and environmentally effective processes and control strategies.

#### Step 3. Other model inputs

Gather other information for air dispersion model inputs including:

- grided terrain data;
- an appropriate cartesian or polar receptor grid for presenting the spatial distribution of odour concentrations; and
- the locations of any specific sensitive receptors, in consultation with local government planners, and any future sensitive receptors, such as residences, schools and hospitals.

Reference all locations to the same fixed origin as used for the source locations.

For assessments, generate a site-specific meteorological data file using methods detailed in Section 6.4 'Meteorological input data'. The data file should include at least one year of hourly average values for the minimum set of parameters required for regulatory models, namely:

- wind speed;
- wind direction;
- ambient temperature; and
- atmospheric stability class and mixing height.

Advanced models will require additional inputs such as spatially varying land-surface type data and threedimensional meteorological fields.

#### Step 4. Choose appropriate odour impact assessment criteria

If the odour release is a single chemical species, select the appropriate criterion from the sources such as Queensland Environmental Protection Policy (Air) or published odour threshold data determined using dynamic dilution olfactometry, as mentioned in Section 5.2.

If the odour release is a complex mixture of chemical species and the odour is offensive and surrounding landuse is sensitive regarding odour impact, then select any one of the guidelines:

- odour impact assessment guidelines based on odour concentration criterion, or
- assessment guidelines based on odour intensity level of "weak"; or
- other tools such as odour annoyance surveys, odour diaries, complaints data and compliance history, which provide additional relevant information for assessing the impact of odour from expansions of, or modifications to existing facilities; or
- other appropriate guidelines, for example, agricultural activities in rural areas can adopt Queensland Department of Agriculture and Fisheries guidelines as they are industry specific.

#### Step 5. Air dispersion model

Select and run an air dispersion model and present outputs in accordance with the recommendations discussed in Section 6.3 'Air dispersion modelling'. This guideline does not recommend the use of any particular model. Air dispersion models such as CALPUFF and AERMOD are still the most popular regulatory models. The appropriate model should be selected based on the requirements of each particular case. Where there is no single atmospheric dispersion model that is able to handle the different atmospheric dispersion characteristics exhibited in the proposal area (e.g. sea breezes, strong convection, terrain features, temperature inversions and pollutant re-circulation), a combination of acceptable models will need to be applied. Conduct an impact assessment with relevant inputs of emissions and local meteorology to an air dispersion model to estimate ground level concentrations at the sensitive receptors.

#### Step 6. Present dispersion model results

Tabulate the odour predictions at each of the existing and likely future sensitive receptors and at the most exposed off-site receptor.

Use model output options to generate grided concentration data for various percentiles (for example 99.5th) or grided frequencies with which various chosen levels (for example 1 ou) are exceeded. Export the grided output files to a suitable graphics software package to create contour plots. Use the graphical outputs to define potential affected zones.

# Step 7. Compare the predictions with odour impact assessment criteria chosen at step 4.

The uncertainty in predicting odour impacts is such that it may not be possible to make a clear cut, pass or fail, decision on a proposal when the predicted impacts are at a level similar to the assessment criterion. In these cases, the decision-making authority may need to seek further information on the likely odour impacts and base its final decision on the local context and the licensing authority's environmental management policies of the local area.

#### Step 8. Odour impact assessment report

The odour impact assessment report must include the information on the rationale for the selection of a methodology, details of model selection, inputs and clear explanation of the modelling results and their implications and the model limitations. The dispersion modelling and impact assessment report must also contain the information at least specified in the following paragraphs:

#### Site plan

Provide a scale location plan, which shows:

- layout of the site clearly showing all unit operations;
- all emissions sources clearly identified;
- facility's boundary;

- most exposed existing or likely future off-site sensitive receptors; and
- topography.

#### Description of the activities carried out on the site

Provide an accurate description of the activity and the surrounding environment. This must include:

- process flow diagram clearly showing all unit operations to be carried out on the premises;
- detailed discussion of all unit operations, including all possible operational variability;
- detailed lists of all process inputs and outputs;
- plans, process flow diagrams and descriptions which clearly identify, and explain all pollution control equipment and pollution control techniques for all processes on the premises;
- a description of all aspects of the air emission control system, with particular regard to any fugitive emission capture (e.g. hooding, ducting), treatment (for example, scrubbers, bag filters) and discharge systems (for example, stacks); and
- operational parameters of all potential emission sources, including all operational variability, that is, location, release type (for example, stack, volume or area) and release parameters(for example, stack height, stack diameter, exhaust velocity, temperature, emission rate) and process type (for example, batch or continuous)).

#### **Emission inventory**

Provide the emission inventory data that is used in modelling, including:

- detailed discussion of the methodology used to calculate the expected odour emission rates for each source with references to the source of the information and the methodologies used for sampling and measurement; and
- a table showing all stack and fugitive source release parameters (for example, temperature, exit velocity, stack dimensions and emission rates).

An odour emission rate model should take into account the following factors, or any other factors that are unique to a particular industry:

- the hours of operation of the facility;
- whether the process or activity is batch or continuous in nature;
- whether emissions vary as a function of process conditions (e.g temperature, pressure etc.), production rate, hour of the day, week, month or season, meteorological variables (e.g. wind speed, ambient temperature, humidity, atmospheric stability class and rainfall), feedstock, and animal age or feed type.

This is not intended to be an exhaustive list and the key parameters will be specific to the industry in question.

#### Description of meteorological data

Describe the meteorological data used in the study including:

- selection and preparation of meteorological data;
- detailed discussion of the prevailing dispersion meteorology at the proposed site. The report should typically include wind rose diagrams and an analysis of wind speed, wind direction, stability class, ambient temperature and joint frequency distributions of the various meteorological parameters;
- description of the techniques used to prepare the meteorological data into a format for use in the dispersion modelling; and

• a description of the results of quality assurance and quality control checks on the meteorological data used in the dispersion modelling.

It is important that the meteorological data is either a representative set of measurements, or that model results are validated against nearby weather station data. It is also highly desirable that model input files or summaries of inputs are provided for verification.

# 6 Supporting guidance

# 6.1 Measurement

The odour concentration of unknown mixtures of compounds is measured using a technique called dynamic olfactometery. A dynamic olfactometer is a dilution apparatus, which mixes streams of odorant sample and dilution air (odour-free) in selected ratios. One or more sets of sniffing ports are attached to the olfactometer, through which either reference air (odour-free) or the diluted odorant can flow out. The human nose is used to detect odour sensation at the sniffing port. Using this technique, the odour concentration of a sample is measured in odour units (ou), which is simply the number of times the sample must be diluted to reach the detection threshold of the panel of humans using their noses as odour detectors.

The Australian and New Zealand Standard AS/NZS 4323.3:2001, Stationary source emissions - Determination of odour concentration by dynamic olfactometry is based on the European CEN standard (CEN, 1999). Queensland DESI adopts AS/NZS 4232.3:2001 as the basis of all odour measurements used in accordance with this guideline for evaluation of odour impact.

The unit of measurement in AS/NZS 4323.3:2001 is the odour unit (ou). The odour concentration at the detection threshold is by definition 1 ou. The AS/NZ standard uses 1-butanol as reference odorant and sets132 µg as the Reference Odour Mass (ROM). For all odorant(s), 1 ou is that concentration of odorant(s) at standard conditions that elicits a physiological response from a panel (detection threshold) equivalent to that elicited by one ROM evaporated in 1 cubic metre of neutral gas at standard conditions. These definitions effectively express odour concentrations in terms of 'n-butanol concentration equivalents'.

Panellists are selected using n-butanol as the chosen reference material. Only people with a consistent personal threshold for n-butanol of between 20 ppb and 80 ppb during 10 measurements over a 3-day period with a log standard deviation less than 2.3 are acceptable.

There are two quality guidelines specified in the standard, accuracy and precision (repeatability). The standard specifies how these two quality guidelines are calculated. The requirement for accuracy means that the laboratory must, at worst, produce a value for the threshold concentration of the reference material, n-butanol, of between 31 and 51 ppb. The criterion for repeatability requires that consecutive single measurements, performed on the same test material in one laboratory shall not differ by more than a factor of 3.0 in 95% of cases or expressed another way, a 95% confidence interval would range from 46% to 218% of a single measured value.

Instrument calibration is required in order to check whether the olfactometer makes dilutions in an accurate and repeatable way. A certified reference gas and a measuring instrument should be used. The calibration gas should not be adsorbed in the measuring instrument or the olfactometer. The measuring instrument should give a linear response over at least 4 orders of magnitude (eg. 0 to 10, 10 to 100, 100 to 1000, 1000 to 10000 dilutions). If this is not possible, the reference gas should be used in different concentrations. These measurements can be used to determine the repeatability by calculating the standard deviation of the dilutions over the entire dilution range of the olfactometer. At least 5 repeats should be made per setting. For each

repeat, the olfactometer settings should be altered and reset again. The resultant data should be used to test for the repeatability and the accuracy. The olfactometer should be calibrated at least once a year.

# 6.2 Sampling

AS/NZS4323.3:2001 includes methods for sampling odours. The sampling technique can be applied to all sources emitting odours, whether point or non-point, provided the odour emissions can be channelled for sampling. Essentially, the standard covers the method for collecting and transferring a sample of odorous gas to a container.

Samples of odours for olfactometric analysis are usually collected in a sample bag and transported to the odour laboratory for analysis. Equipment used in the sampling process must be chosen to minimise the likelihood of adsorption, chemical transformation or diffusion both in the sample train and in the sample container.

The number of odour samples required will depend upon the nature of the source of the purpose of the measurement. Sufficient samples should be taken to ensure that the odour stream is properly quantified. Replicate samples will enable the calculation of some basic statistics of measurement. The number of replicate analyses required to achieve a definite precision is discussed in AS/NZS 4323.3:2001.

The most commonly used method of static sample collection uses the 'lung principle'. Here the sample bag is placed in a rigid container, the air is removed from the container using a vacuum pump and the reduced pressure in the container causes the bag to fill. The period during which the sample bag is filled will depend upon the fluctuation, with time, of the odour emission. If the odour stream is considered to be constant, then point samples will be adequate. The period during which the sample is taken shall be determined taking into account the fluctuation of the odour emissions with time. Taking the sample over a period of a few minutes averages short-term fluctuations. Taking point samples at appropriate times during the emission cycle averages longer-term fluctuations.

Where the gaseous flow is hot or humid, such that condensation within the bag is possible, in-situ pre-dilution is recommended. This can be done statically, by pre-filling the sample bag with a known volume of neutral gas and then adding a known volume of sample, or better, by dynamically mixing known volumes of sample and neutral gas in a pre-dilution device. The pre-dilution device should be regularly calibrated so that the dilution factor is known.

AS/NZS4323.3:2001 describes sampling equipment for sampling from a point source, for example, ventilation outlets, but does not cover sampling area sources where there is little or no outward flow. The area source sampling and monitoring is described in Australian/New Zealand Standard AS/NZS 4323.4:2009 "Stationary source emissions –Method 4: Area source sampling – Flux chamber technique". This standard provides a sampling method for assessing odours released from area sources such as landfills, sewage treatment plants, composting surfaces and agriculture and contaminated/remediation sites. It is has been reported in the literature that this method generally provides emissions at an order of magnitude less than real world situations. This is primarily due to the flow of air through the devices. The flux chamber has a very low sweep air flow rate compared to the real world. In real world, as wind speed increases, and air becomes less stable, mass transfer occurs faster, thus increasing the odour emission rates. Odour emissions from area sources are dependent on wind speed and atmospheric stability. As odour measurement from area sources using flux chamber are usually made at specific wind speed and neutral stability conditions, adjustment must be made to reflect the varying wind speed and stability conditions in the natural environment. The odour emission rates measured using flux chamber must be adjusted to vary with wind speed and stability class by applying the scaling factors as discussed by Watts (2000).

# 6.3 Air dispersion modelling

Air dispersion modelling provides a means of assessing the impacts of odour emissions in the environment surrounding proposed facilities. Using appropriate emissions and meteorological inputs, a model predicts ground-level concentrations of odour, which can be compared to odour impact assessment guidelines to evaluate the risk of nuisance to the surrounding community.

The most widely used regulatory air dispersion models in Queensland are Gaussian plume model AERMOD and puff model CALPUFF. AERMOD which was developed by American Meteorological Society and US EPA Regulatory Model Improvement committee is the US EPA recommended model for near-field applications. CALPUFF is also a US EPA's preferred model for assessing long-range transport of pollutants in complex terrain and on a case-by-case basis for certain near-field applications involving complex meteorological conditions. Some of the drawbacks of steady state model such as AERMOD include its treatment of roughness length, calm and light wind conditions, the steady state assumptions, and the usage of just single station meteorology. In coastal areas for the odour sources located close to the ground, worst case dispersive conditions tend to occur at night due to increased stability associated with very light wind, low turbulence and persistent inversions which act to restrict the vertical dispersion of odours. Odours emitted into the stable nocturnal environment will either accumulate if calm conditions prevail or will flow downwind with the drainage flow. In these conditions, build-up of odours over several hours is common and will disperse with increase in turbulence usually at sunrise. Steady state plume model such as AERMOD is not able to simulate the stagnation of odours. This type of model also has no prior knowledge of the previous hours' meteorological or emission conditions as each hour is treated independently. In comparison, the three-dimensional non-steady state model such as CALPUFF can handle terrain channelling effects, calm wind conditions and stagnation events. CALPUFF model expected to provide more accurate odour impact assessments than steady-state Gaussian plume models in the exceptional circumstances described above. In Queensland there are many areas where the frequency of very light winds is high. At these locations, the steady-state modelling results differ widely from those of CALPUFF, which is technically better formulated for these conditions. Similarly, in areas where terrain affects are likely to be significant CALPUFF is a more suitable model.

Proponents may consider alternatives to the steady-state Gaussian models when assessments require predictions of odour concentrations far from the source of release, in complex terrain or at locations where light winds, convective conditions and sea-breeze circulations occur frequently. In some cases, it may be necessary to weigh up the convenience and limitations of the steady-state Gaussian models against the complexity and additional demands of advanced models and seek advice from the DESI before embarking on the assessment.

DESI cannot prescribe any one model that suits all situations and leaves the choice open to proponents on a case-by-case basis. DESI takes this position in order to allow scientific and technical advances to be introduced without regulatory delays. However, DESI reserves the right to reject a proposed model or application thereof, if it considers it to be inadequate, inappropriate or unproven. The proponent should justify the selection of model based on the merits of the particular case. Wherever practicable, the model that is expected to most accurately estimate concentrations for the application of interest should be selected. Early discussion with the DESI officers is recommended, especially if a model other than those mentioned above is selected. Agreement on the data base to be used, modelling techniques to be applied and the overall technical approach, prior to the actual analyses, helps avoid misunderstandings, concerning the final results and may reduce the later need for additional analyses.

Current air dispersion models work from hourly meteorological inputs and thus are only able to predict hourlyaverage odour concentrations. Humans can sense concentrations of odorous substances that last only for a few seconds. Within each modelled hour, the odour concentration will fluctuate above and below the predicted average concentration as a result of atmospheric turbulence. Theoretical 'peak to mean' factors of been derived to estimate the magnitude and probability of occurrence of peak odour concentrations within an hour (NSW EPA, 2022). DESI has decided not to incorporate these factors in its impact assessment guidelines until there is better understanding of how these theoretical peak concentrations might relate to adverse impact in a community. Odour impact assessment guidelines for odour mixtures in this guideline therefore apply to modelled concentrations averaged over 1-hour.

For single chemical species, 1-hour average concentrations need to be converted to shorter-term averages for assessment against air quality goals. For wake-free tall stacks, a conservative approach should be adopted, with conversion utilising the Turner Power Law. This equates to use of conservative coefficient in the equation. Hibberd (1998) has recommended a value 0.38 for tall stacks. For other techniques, the key is that assumptions underlying the conversion apply in the specific case. Another option is to use field measurements. The technique used in (Hibberd 1998) which utilised analysis of field measurements of relevant short-term and one hour ambient concentrations to derive conversion factors is acceptable.

Results of odour dispersion modelling may be presented as concentration contour plots and frequency contour plots. The former shows the spatial distribution of odour concentrations at a given percentile level (for example, 99.5%) around a source and are useful in showing where worst-case impacts occur. The latter shows the spatial distribution of frequencies with which a given level of odour, (for example, 1 ou), is exceeded. These are useful for looking at effects at specific places. Most dispersion models have such facilities for exporting model output data to graphics software packages such as SURFER for plotting contours.

# 6.4 Meteorological input data

The basic meteorological parameters required for air dispersion modelling are ambient temperature, wind speed, direction, thickness of the boundary layer and atmospheric stability determined using a simple Pasquill Gifford classification. The Monin-Obukhov length is a more fundamental descriptor of atmospheric stability and is used in more advanced modelling. It is derived from additional meteorological observations including friction velocity and heat flux.

The assessment in this guideline require the use of at least one year of hourly meteorological data which are representative of local conditions. The CSIRO's air quality model TAPM can be used to generate hourly one-year meteorological data required for the dispersion models. This is a prognostic meteorological model, which eliminates the need to have site-specific meteorological observations. The model can predict airflow important to local scale air pollution such as sea breezes and terrain induced flows. For sites where observed meteorological data is not available and the site is subject to the sea and land breeze effects, it is preferable to use TAPM model for the generation of meteorological data.

# 6.5 Complexity of dispersion modelling

One of the drawbacks of dispersion modelling with multiple sources of odour is that the model assumes that the odours are additive. While this is correct for single chemical contaminants, it is not correct for odour units because the actual downwind odour concentration will depend on the various concentrations of the chemical constituents in the odour mixture. If the two sources were of quite different make-up, then the combined, diluted mixture of these two odour sources can have quite a different cumulative impact on the receiving environment. In some cases, the effects may be additive and in other cases it may be positively or negatively synergistic. The modelling of multiple odour sources is quite complex and a little is currently understood about the cumulative impacts of multiple odour sources. It is reasonable to expect multiple sources of the same type of odorant (eg.

multiple sheds on a poultry farm) to be additive in nature. An example of different type of odorant would be the rendering plant cooking odour via a chimney and the diffuse source odour from a wastewater treatment system.

As a general guideline, emissions from like sources may be combined but for odours with different characteristics, the one with the steepest intensity curve versus concentration curve is likely to make the dominant contribution to odour impact. In some cases, odours can be masked by other odours. Each case should be considered on its own merits, and expert advice sought in complicated situations. For the dispersion modelling exercise, as a conservative approach the proponent may consider the odours from different sources as additive.

Facilities with multiple odour sources should determine the odour intensity concentration relationship for each source and use the concentration, which relates to the strongest odour (highest intensity) for comparison with designated guidelines. A weak odour (low intensity) in multiple sources with high emission rate should be modelled separately and compared with its designated criterion. All sources should comply with the relevant guidelines.

For facilities with area and point sources with the same odour characteristic, a single criterion of 5 ou can be adopted (at nose response time, 99.5 percentile). In this case, the cumulative impact can be determined by multiplying the emission rates with the peak-to-mean ratios (10 for wake-free stacks and 2 for other sources) and entering this data as input to the dispersion model, so that the output of the model will be at the nose response time.

Of the input data required, emission rates are the most problematical, particularly for area sources. Assumptions about new processes cannot rely completely on data for existing processes unless there is confidence about the odour characteristics. Information on the way emission rates vary with time is needed for modelling but is seldom available. Only the meteorology is treated as time dependent. Sometimes the emission rate from area sources depends on the wind speed as well.

Source information compiled for modelling should include all sources of odour from the proposed development and other nearby facilities. Background odour concentrations should be considered but, because humans can discriminate odours quite well, the odour impact of a new source may be noticeable even when the background odour concentrations are relatively high.

Separate modelling runs with sources under the maximum emission rates or "upset conditions" may also be needed to demonstrate the sensitivity of the activity to variations in the magnitude of odour emissions.

# 6.6 Buffer or Separation distances

Proper land use planning avoids allowing incompatible land uses in close proximity and is one of the most important tools in odour management. Many odour problems can be avoided by appropriate siting of new facilities.

For the purposes of this guideline, DESI adopts the Victorian EPA philosophy on buffer distances and that is, separation distances are provided as a risk management tool to manage unexpected or accidental emissions from a facility. They are provided to cater for non-routine emissions that may arise from upsets in normal operations of a premise. Separation distances provide an additional level of protection by allowing more distance and space in which emissions may dissipate without adversely affecting sensitive receptors.

DESI has some industry specific guidance on buffer distances, for example for the landfill refers to: "Guideline: landfill siting, design, operation and rehabilitation", Queensland. If DESI industry specific guidance on buffer distance is not available, then this guideline recommends that the Victorian EPA's Recommended Separation

Distances for Industrial Residual Air Emissions – Guideline, Publication No. 1518, be adopted as an interim guideline on buffer distances.

Planning and other responsible authorities will be required to apply the guidelines in assessing the suitability of proposed development locations and the potential impacts of development. These guidelines assume a good standard of odour management is carried out on site. Separation distances will thus not be offered or used as a substitute for the effective management of emissions at source.

# 6.7 Likely conditions of approval for odorous industries

The outcome of preventing an environmental nuisance or harm due to release of noxious or offensive odour would generally be a condition considered necessary and desirable in all instances where the DESI authorise an activity with material risk of odours. In addition, for higher risk situations, conditions may require taking of stated measures to minimise likelihood of environmental harm may be considered necessary or desirable. It is also possible to use odour impact assessment guidelines in reverse, that is, fix the ambient concentrations at a sensitive receptor and use a dispersion model to calculate the emission rates and release conditions (for example, stack height), necessary to achieve compliance with the assessment guidelines. Subject to confidence in modelling techniques, the method can be used to provide a guide to acceptable odour emission rates and release parameters. Relevant emission conditions upon which the model conclusions were based must be referenced by specifying release parameters such as mass emission rate, gas flow rate, minimum temperature and stack height. In the event that the emission rates calculated by modelling proved inadequate or much too stringent, there are ultimately provisions in the *Environmental Protection Act 1994*, which allow for amendments by the holder and the DESI based on relevant information.

# 7 Definitions and abbreviations

99.5th Percentile	The modelled odour concentration at a selected point that is exceeded in a given hour with a probability less than or equal to $(1.0 - 0.995)$ . This statistical definition is often interpreted (for better or for worse) as percentage compliance, namely, the odour concentration that is exceeded for no more than 0.5% of the meteorological conditions in the length of the meteorological input file (rounded to 44 hours for one year of hourly meteorological inputs).
99.9th Percentile	The modelled odour concentration at a selected point that is exceeded in a given hour with a probability less than or equal to $(1.0 - 0.999)$ . As above, this equates to the odour concentration that is exceeded for no more than 0.1% of the meteorological conditions in the length of the meteorological input file.
AS/NZS-4323.3:2001	Australian and New Zealand Standard, Stationary source emissions - Determination of odour concentration by dynamic olfactometry
Commercial place	A place used as an office or for business, industry or commercial purposes.
CEN	Committe Europeen de Normalisation.
Detection threshold	The highest dilution factor at which the sample has a probability of 0.5 of eliciting with certainty, the correct perception that an odour is present. This dilution factor will be too high for the sample to be recognized.
Dwelling	Dwelling means any of the following structures or vehicles that is principally used as a residence:

	<ul> <li>(a) a house, unit, motel, nursing home or other building or part of a building;</li> <li>(b) a caravan, mobile home or other vehicle or structure on land; and</li> <li>(c) a watercraft in a marina.</li> </ul>				
Dynamic olfactometer	A dynamic olfactometer delivers a flow of mixtures of odorous and neutral gas with known dilution factors in a common outlet.				
Dynamic olfactometry	Olfactometry using a dynamic olfactometer.				
DESI	Queensland Department of Environment, Science and Innovation				
FIDOL factors	Factors which ought to be considered when assessing the impact of odours in the environment are:				
	<ul> <li>the frequency (F) of the occurrence;</li> <li>the intensity (I) of the odour;</li> <li>the duration (D) of exposure to the odour;</li> <li>the offensiveness (O) of the odour; and</li> <li>the location (L).</li> </ul>				
Non-point source	Means any release other than point source.				
Noxious	Means harmful or injurious to health or physical well-being.				
Odorant	A substance which stimulates a human olfactory system so that an odour is perceived.				
Odour	Organoleptic attribute perceptible by the olfactory organ on sniffing certain volatile substances.				
Odour concentration	The number of odour units.				
Odour intensity	The intensity of an odour sensation which is triggered by an odour stimulus. The perceived strength of the odour sensation increases with increasing concentration, as a logarithmic or power function.				
Odour unit (ou)	One odour unit (ou) is that concentration of odorant(s) at standard conditions that elicits a physiological response from a panel (detection threshold) equivalent to that elicited by one Reference Odour Mass (ROM), evaporated in one cubic metre of neutral gas at standard conditions.				
Offensive	Means causing unreasonable offence or displeasure; is unreasonably disagreeable to the sense; disgusting, nauseous or repulsive.				
Peak-to-mean ratio	A conversion factor that adjusts mean dispersion model predictions to the peak concentrations perceived by the human nose. Default ratios are used in this policy in the absence of site-specific research that should be realistic in generalised circumstances.				
Point source	Means any stack, chimney, vent, infrastructure, or device which is designed to cause or allow the release of contaminants to the atmosphere.				
Protected area	Protected area means:				
	<ul> <li>(a) a protected area under the Nature Conservation Act 1992; or</li> <li>(b) a marine park under the Marine Parks Act 1982; or</li> <li>(c) a World Heritage Area.</li> </ul>				

Reference odour mass (ROM) The acceptable reference value for the odour unit, equal to a defined mass of a certified reference material. One ROM is equivalent to 132 µg n-butanol which evaporated in 1 cubic metre of neutral gas at standard conditions produces a concentration of 40 ppb (µmol/mol). Sensitive receptor Sensitive Receptor means: (a) a dwelling, residential allotment, mobile home or caravan park, residential marina or other residential premises; or (b) a motel, hotel or hostel; or (c) a kindergarten, school, university or other educational institution; or (d) a medical centre or hospital; or (e) a protected area; or (f) a public park or gardens; or (g) a commercial place or part of the place potentially affected. It includes the curtilage of such any place and any place known or likely to become a sensitive place in the future. Wake-free stack When stack height is more than 2.5 times the height of the largest nearby building, the surrounding buildings do not influence the stack top airflow.

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#### Disclaimer

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# APPENDIX A – ALTERNATIVE TOOLS FOR ODOUR ASSESSMENT

# **Odour intensity**

DESI will accept an assessment of odour impacts from the sources using an odour intensity criterion. This approach recognises the fact that the same concentration (stimulus) of different odorants does not elicit the same perception of intensity (response) in people. This approach may be advantageous to activities that emit odorous substances that exhibit low intensity at relatively high concentration.

Odour concentrations above the detection threshold are not direct indicators of perceived odour intensity. For each odorant, its odour intensity is a non-linear function of its concentration and the perceived odour intensity can be described using a mathematical equation (Stevens Law or the Weber-Fechner Law). The Weber Fechner law can be expressed by the equation:

# I = kw log (C/C0) + constant

Where, **I** - is the perceived psychological intensity;

kw – is the Weber-Fechner constant;
C – is the concentration of odorant (ou);
C0 – is the concentration of odorant at the detection threshold (1 ou); and
Constant – is the constant calculated from the line of best fit for the odorant.

Odour intensity can be categorised according to the German Standard method VDI 3882/1, Olfactometry -Determination of Odour Intensity, Part 1, 1992, into odour intensity in categories described as not perceptible, very weak, weak, distinct, strong, very strong and extremely strong and assigned corresponding numerical values, 0 to 6. The seven-point intensity scale is defined as follows:

- 0. not detectable
- 1. very weak
- 2. weak
- 3. distinct
- 4. strong
- 5. very strong
- 6. extremely strong

Solving the experimentally established Stevens Law or Weber-Fechner equations at a particular intensity level for odours characteristic of an individual facility yields the corresponding odour concentration guideline value. The approach requires a considerable amount of initial work by a proponent or industry group to establish the intensity versus concentration relationships for a particular odour type. The necessary research has been done for the intensive chicken growing industry and to a lesser extent, the intensive pig growing industry in Australia. Some research work has also been done to develop relationship for activities such as municipal landfill, oil extraction, wastewater treatment and alumina refinery (Schulz et al. 2002).

This method requires an odour intensity study to determine the relationship between odour concentration and odour intensity, in order to specify the odour concentration equivalent to the intensity level of "weak". The method used to determine odour concentration and intensity must follow the procedure and standards set in the Australian and New Zealand Standard (AS/NZS 4323.3:2001) and the German Standard VDI 3882/1 in order to be meaningfully compared with the DESI odour guidelines. The samples collected from the source will be analysed simultaneously in the laboratory for odour concentration and intensity, using odour panels and dynamic olfactometry equipment. By doing this, it is possible to develop a relationship between them and determine the odour concentration equivalent to the intensity level of "weak".

As with the assessment above, the proponent should conduct computer modelling and compare the results with the following criterion:

- odour concentration equivalent to an intensity level of "weak" divided by the relevant default peak to mean ratio, averaged over one-hour, 99.5th percentile, applicable at the "most exposed existing or likely future off-site sensitive receptors"; and
- for facilities that do not operate continuously, the 99.5th percentile must be applied to the actual hours of operation.

As discussed above, the relevant default peak to mean ratios are 10:1 for wake-free stacks and 2:1 for ground-level sources or wake-affected stacks.

DESI recognises there may be a justification to vary the design guidelines in some cases depending on the offensiveness of the odour, the surrounding land uses and the values of affected communities. It is considered that setting the annoyance threshold at weak rather than distinct or strong is an approach most likely to protect amenity. Where the odours are a normal feature of the environment or have a low offensiveness rating, this may be too conservative and thus DESI would, subject to the following issues being addressed, support using the odour concentration equivalent to an intensity level of "distinct" in such cases.

In seeking a relaxation of the design guidelines, a proponent must submit well-researched supporting evidence to the DESI. The proponent must be able to satisfy the DESI that surrounding land-uses are of low sensitivity to odour impacts or that the odour has a low offensiveness rating or that the affected community would tolerate some degree of impacts. For example, it may be reasonable to expect agricultural odours in rural areas or industrial odours within industrial estates. Community odour dose annoyance response functions, based on good experimental data for a similar industry and a similar community, may provide a good case for considering variations of the design guidelines. The aim of the DESI is that there should be no objectionable or offensive odour to the extent that it causes an adverse effect at or beyond the boundary of the site.

#### Field odour survey

The field odour survey is a recognised method of determining the effects of odour in the environment. The approach used for field odour survey in Australia is generally based on the truncated form of the German Standard "Determination of odorants in ambient air by field inspection" (VDI 3940, 2006). A useful scale for describing odour intensity during field observations is detailed in German Standard VDI 3882 (I) 1992: "Olfactometry Determination of Odour Intensity". The procedure requires recording odour intensity every 10 seconds over a period of at least 10 minutes at each location. A standard ranking system based on the seven-point intensity scale must be used for recording odour on a survey sheet. In May 2017, a new European standard, EN16841 was released which supersedes other ambient odour assessment standards in European Union. Like the VDI3940 standard, EN16841 has two principal methods: (a) Grid method and (b) Plume method. The grid method uses direct assessment of ambient air by panel members to characterize odour exposure in a defined assessment area. However, the plume method is used for determining the extent of the downwind odour plume from a specific source based on direct observation in the field by human panel members under specific meteorological conditions.

The field odour survey in Queensland must be carried out by an experience odour assessor and derived from the guidelines for field odour survey contained in the above standards and considering the FIDOL (frequency, intensity, duration, offensiveness and location) factors. The results of field survey shall be interpreted to assess the impact of odour nuisance in terms of how the odour is perceived by humans. The field-based odour intensity data can also be used to verify the odour modelling results.

#### **Community odour surveys**

In order to assess the current status of odour impacts from existing industries as perceived by the local community, odour surveys can also be conducted to measure the "population annoyance". A standard procedure for conducting odour surveys is discussed in the New Zealand Good Practice Guide for Odour Management. The information given in this guideline should be adopted when conducting an odour survey in Queensland. It is recommended that odour surveys should be used as an alternative tool in areas where sufficient population density is available to achieve statistically significant results. In low population areas, odour modelling and complaint records are preferred method of assessment.

The odour survey is designed as a set of standard questions about the state of the environment to minimise the potential for biased responses from participants. Respondents from a selected community are asked about the level of annoyance that they experience from odour and the responses are classified according to the following degree of annoyance:

- 0 Definitely not annoying
- 1 Very little annoyance
- 2 Some annoyance
- 3 Annoying
- 4 Quite annoying
- 5 Very annoying
- 6 Extremely annoying

The criterion used from the odour survey is the "percent at-least annoyed" category, which is made up of the responses ranging from annoying (3) to extremely annoying (6).

#### Odour diaries

Odour diaries provide a method of obtaining information from a community regarding the zone of impact from an odour source and the associated characteristics of the odour exposure pattern. This information should be sought from a subgroup of the community, rather than passively received by the administering authority (i.e. from complainants).

The aim of the diaries is to verify complaints and collect information on the frequency and intensity of odour exposures, at various locations, over a defined period of time, in order that action may be taken (if necessary). The information provided by odour diaries needs to be validated by checking the wind-direction and site emission status during the time of each recorded odour event. This can assist in identifying the specific processes that may be contributing to the odour impact. The longer the monitoring period, the more accurate the results, however the time period should be limited as the impacted people will usually not accept the odour nuisance for extended periods and fatigue with the process will occur. Odour diaries are a good option when it is important to monitor the impacts from a specific source within a defined time frame.

The use of odour diaries is a relatively simple and effective way for administering authorities to actively involve the community in the investigation process and obtain meaningful information on which an investigation process can be progressed. Odour diaries should be used in preference to odour annoyance surveys where there are low population densities. The information recorded in a comprehensive diary program includes:

- Date and time of day;
- Duration of the event;
- Continuity of the odour during the event;
- Character and strength of odour;
- Likely source of odour; and
- Wind direction and strength.

Diarists should be given instruction on recording information so that it is consistent and the information can be analysed objectively.

#### Odour complaints

An odour related nuisance complaint can be made to the administering authority either in writing or orally, and must include the following:

- the complainants name and residential address; and
- a telephone number at which the complainant can be contacted; and
- enough details of the emission to allow the authority to investigate whether the emission is causing an unlawful environmental nuisance.

If at any time after a nuisance complaint has been made, the administering authority believes, on reasonable grounds, that the complaint is frivolous, vexatious or based on a mistaken belief, the authority may reject the complaint without further investigation. Similarly, should a complainant fail to provide sufficient detail to allow an effective investigation to be undertaken, the authority may decide not to investigate the complaint.

A sequential summary of odour complaints data can be used to indicate changes in long-term odour exposure. Trends can illustrate seasonal changes in complaint frequency, which may be due to changes in plant production or changes in the prevailing meteorological conditions. This information can be used in determining the history of an existing plant.

# Compliance history

If an existing facility has a current environmental authority, then it is subject to the requirements of the licence conditions, the *Environmental Protection Act 1994*, the *Environmental Protection (Air) Policy 2019* and the *Environmental Protection Regulation 2019*. The regulatory agency may consider the compliance history of existing facilities when processing the application for an extension of the project.