

Appendix A

Supplemental Water Information

**City of Loveland
Estimated Monthly/Annual Usage for Test Year by Customer Class Per Tap Size / Units for Multi-Family
Water Fund**

Class and Meter Size (Residential (Rate City))	Est. 2008 Connect/Units	Estimated Usage by Month by Tap Size or Number of Units for Multi-Family - Using Average Usage for FY's 2000 - 2005												Annual Total	
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec		
Residential (Rate City)	30,320	94,494,662	87,642,532	80,146,816	112,022,023	182,474,337	222,641,337	331,301,520	333,033,821	376,330,897	182,645,823	106,648,236	54,588,628	20,127,877	21,187,877
1"	52	606,000	492,215	483,424	693,000	1,206,200	2,046,200	3,796,200	3,796,200	3,200,000	2,001,200	844,200	268,800	171,800	171,800
2"	6	396,000	414,000	479,200	698,700	1,100,000	1,810,000	3,080,000	3,080,000	2,600,000	1,600,000	644,000	208,800	131,800	131,800
3"	800	5,877,000	5,806,000	5,654,800	8,065,000	13,027,000	21,820,000	36,800,000	36,800,000	31,200,000	19,200,000	7,720,000	2,500,000	1,500,000	1,500,000
1 1/2"	3	24,607	18,807	18,807	27,271	47,714	82,714	145,714	145,714	125,714	77,714	31,714	10,714	10,714	10,714
1"	2	294,607	182,807	172,143	250,271	431,143	750,271	1,320,271	1,320,271	1,140,271	700,271	280,271	93,271	93,271	93,271
2"	4	1,178,000	1,178,000	1,178,000	1,712,000	2,852,000	4,852,000	8,200,000	8,200,000	7,000,000	4,400,000	1,700,000	560,000	360,000	360,000
3"	4	821,400	718,271	722,143	1,030,271	1,712,143	2,942,271	5,030,271	5,030,271	4,300,271	2,600,271	1,000,271	330,271	210,271	210,271
6"	2	1,178,000	1,178,000	1,178,000	1,712,000	2,852,000	4,852,000	8,200,000	8,200,000	7,000,000	4,400,000	1,700,000	560,000	360,000	360,000
Total Residential	3,213	15,877,214	15,000,000	14,200,000	20,000,000	32,000,000	52,000,000	85,000,000	85,000,000	73,000,000	45,000,000	17,000,000	5,500,000	5,500,000	5,500,000
Multi-Family 2-8 Units	1,698	7,170,112	6,400,000	6,881,774	7,122,560	9,128,860	12,600,307	15,322,016	15,322,016	13,244,833	8,344,172	3,184,172	1,141,729	1,141,729	1,141,729
1"	1,078	4,897,811	4,146,420	4,216,462	5,906,614	9,206,791	12,600,307	15,322,016	15,322,016	13,244,833	8,344,172	3,184,172	1,141,729	1,141,729	1,141,729
1 1/2"	81	2,386,000	2,086,119	2,186,464	2,942,809	3,291,158	4,088,075	4,851,814	4,851,814	4,178,000	2,600,000	950,000	320,000	320,000	320,000
2"	129	380,302	311,461	310,851	383,000	577,465	827,921	1,000,000	1,000,000	860,000	540,000	200,000	70,000	70,000	70,000
3"	86	377,000	306,000	299,400	397,719	584,110	827,719	1,000,000	1,000,000	860,000	540,000	200,000	70,000	70,000	70,000
1 1/2"	311	372,184	309,534	316,800	416,800	595,566	827,719	1,000,000	1,000,000	860,000	540,000	200,000	70,000	70,000	70,000
1"	20	2,800,000	2,300,000	2,300,000	3,100,000	4,400,000	6,000,000	7,000,000	7,000,000	6,000,000	3,800,000	1,400,000	500,000	500,000	500,000
1 1/2"	798	2,297,075	2,124,000	2,200,075	2,979,177	4,188,589	5,771,177	6,850,000	6,850,000	5,900,000	3,700,000	1,400,000	500,000	500,000	500,000
2"	548	1,056,871	1,734,867	1,792,271	2,421,143	3,354,143	4,500,000	5,300,000	5,300,000	4,500,000	2,800,000	1,000,000	330,000	330,000	330,000
3"	286	1,056,871	1,664,000	1,627,143	2,121,143	2,852,000	3,800,000	4,400,000	4,400,000	3,800,000	2,300,000	800,000	260,000	260,000	260,000
6"	1,073	2,000,000	2,111,000	2,111,000	2,920,000	4,000,000	5,400,000	6,300,000	6,300,000	5,400,000	3,300,000	1,200,000	400,000	400,000	400,000
Total Multi-Family	3,213	15,877,214	15,000,000	14,200,000	20,000,000	32,000,000	52,000,000	85,000,000	85,000,000	73,000,000	45,000,000	17,000,000	5,500,000	5,500,000	5,500,000
Irrigation Accounts - Inside	308	78,466	178,877	294,633	2,406,333	38,103,334	78,466,334	100,000,000	100,000,000	85,000,000	50,000,000	20,000,000	7,000,000	7,000,000	7,000,000
3/4"	182	18,237	20,745	477,258	2,454,258	4,527,745	8,788,449	13,788,449	13,788,449	11,788,449	6,788,449	2,788,449	1,000,000	1,000,000	1,000,000
1"	64	32,825	132,132	1,918,750	6,941,628	12,371,468	17,748,000	22,118,000	22,118,000	18,748,000	10,748,000	4,248,000	1,568,000	1,568,000	1,568,000
1 1/2"	42	8,819	23,456	108,278	2,654,142	5,488,281	9,488,281	13,488,281	13,488,281	11,488,281	6,488,281	2,488,281	908,281	908,281	908,281
2"	8	7,774	30,346	3,862	478,887	4,446,143	3,243,241	10,643,241	10,643,241	9,000,000	5,000,000	2,000,000	700,000	700,000	700,000
3"	3	-	-	3,000	17,300	87,000	350,000	350,000	350,000	300,000	150,000	50,000	20,000	20,000	20,000
3/4"	3	-	-	2,923	11,625	33,345	30,813	30,813	30,813	27,345	15,345	7,345	2,813	2,813	2,813
1"	640	-	-	640	144,500	491,500	692,500	791,500	791,500	651,500	351,500	151,500	51,500	51,500	51,500
1 1/2"	1	-	-	5,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000
2"	1	-	-	5,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000
3"	1	-	-	5,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000
4"	1	-	-	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000
Total Irrigation	308	78,466	178,877	294,633	2,406,333	38,103,334	78,466,334	100,000,000	100,000,000	85,000,000	50,000,000	20,000,000	7,000,000	7,000,000	7,000,000
Commercial - Inside no WOC	182	4,816,848	4,478,219	4,651,200	6,108,200	8,450,200	11,800,200	14,150,200	14,150,200	12,000,200	7,000,200	2,500,200	800,200	800,200	800,200
3/4"	182	4,816,848	4,478,219	4,651,200	6,108,200	8,450,200	11,800,200	14,150,200	14,150,200	12,000,200	7,000,200	2,500,200	800,200	800,200	800,200
1 1/2"	77	4,870,200	4,528,200	4,628,200	6,108,200	8,450,200	11,800,200	14,150,200	14,150,200	12,000,200	7,000,200	2,500,200	800,200	800,200	800,200
2"	72	4,917,816	4,608,816	4,770,816	6,300,816	8,594,816	11,900,816	14,210,816	14,210,816	12,100,816	7,100,816	2,600,816	850,816	850,816	850,816
3"	4	1,812,000	1,700,000	1,800,000	2,300,000	3,100,000	4,200,000	4,900,000	4,900,000	4,100,000	2,400,000	800,000	260,000	260,000	260,000
4"	3	1,812,000	1,700,000	1,800,000	2,300,000	3,100,000	4,200,000	4,900,000	4,900,000	4,100,000	2,400,000	800,000	260,000	260,000	260,000
6"	3	1,812,000	1,700,000	1,800,000	2,300,000	3,100,000	4,200,000	4,900,000	4,900,000	4,100,000	2,400,000	800,000	260,000	260,000	260,000
Total Commercial - Inside (No Sewer)	308	15,877,214	15,000,000	14,200,000	20,000,000	32,000,000	52,000,000	85,000,000	85,000,000	73,000,000	45,000,000	17,000,000	5,500,000	5,500,000	5,500,000
Commercial - Outside (No Sewer)	74	78,937	64,574	700,000	748,107	1,074,508	1,466,897	1,859,286	1,859,286	1,574,897	874,508	300,000	100,000	100,000	100,000
3/4"	74	78,937	64,574	700,000	748,107	1,074,508	1,466,897	1,859,286	1,859,286	1,574,897	874,508	300,000	100,000	100,000	100,000
1"	11	283,200	251,200	270,710	333,706	450,504	590,190	744,440	744,440	630,190	344,440	124,440	44,440	44,440	44,440
1 1/2"	2	583,900	497,140	540,420	683,871	918,871	1,200,000	1,500,000	1,500,000	1,260,000	680,000	240,000	80,000	80,000	80,000
2"	2	1,629,237	1,341,077	1,462,200	1,859,482	2,500,000	3,200,000	4,100,000	4,100,000	3,400,000	1,900,000	680,000	240,000	240,000	240,000
3"	12	391,256	397,641	464,231	644,231	884,231	1,174,231	1,464,231	1,464,231	1,244,231	684,231	244,231	84,231	84,231	84,231
4"	3	152,000	152,000	164,000	200,000	268,000	352,000	436,000	436,000	368,000	200,000	72,000	24,000	24,000	24,000
6"	3	152,000	152,000	164,000	200,000	268,000	352,000	436,000	436,000	368,000	200,000	72,000	24,000	24,000	24,000
Total Commercial - Outside	308	15,877,214	15,000,000	14,200,000	20,000,000	32,000,000	52,000,000	85,000,000	85,000,000	73,000,000	45,000,000	17,000,000	5,500,000	5,500,000	5,500,000
Industrial - Industrial Rate	1	15,320	15,320	15,320	21,400	28,500	38,000	50,000	50,000	42,000	25,000	10,000	3,000	3,000	3,000
1 1/2"	1	15,320	15,320	15,320	21,400	28,500	38,000	50,000	50,000	42,000	25,000	10,000	3,000	3,000	3,000
2"	2	30,640	30,640	30,640	42,800	57,000	76,000	100,000	100,000	84,000	50,000	20,000	6,000	6,000	6,000
3"	3	45,960	45,960	45,960	64,200	85,500	114,000	150,000	150,000						

**City of Loveland
Total Usage by Customer Class Per Tap Size / Units for Multi-Family
Water Fund - FY 2006**

Class and Meter Size (Residential (Inside City))	Estimated Total Usage by Month by Tap Size of Number of Units for Multi-Family												Total		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec			
1.5" C-1	13,927	11,083,647	80,362,411	114,680,659	216,788,002	391,482,524	333,143,734	337,871,175	263,324,550	171,268,611	84,622,000	62,288,131	13,980,801	457	1,938,000
2" C-1	79	4,472,000	34,000,000	34,000,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000
3" C-1	2	20,000	396,000	396,000	403,000	1,910,000	986,000	750,000	580,000	410,000	210,000	110,000	60,000	10,000	1,000
4" C-1	84	4,000,000	4,146,000	6,010,000	6,840,000	16,863,726	15,796,731	13,324,729	10,813,327	7,640,000	4,370,000	2,410,000	1,010,000	500,000	1,000
1.5" C-2	2	20,000	396,000	396,000	403,000	1,910,000	986,000	750,000	580,000	410,000	210,000	110,000	60,000	10,000	1,000
2" C-2	79	4,472,000	34,000,000	34,000,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000
3" C-2	2	20,000	396,000	396,000	403,000	1,910,000	986,000	750,000	580,000	410,000	210,000	110,000	60,000	10,000	1,000
4" C-2	84	4,000,000	4,146,000	6,010,000	6,840,000	16,863,726	15,796,731	13,324,729	10,813,327	7,640,000	4,370,000	2,410,000	1,010,000	500,000	1,000
6" C-2	2	20,000	396,000	396,000	403,000	1,910,000	986,000	750,000	580,000	410,000	210,000	110,000	60,000	10,000	1,000
Total Residential	20,281	38,326,447	86,497,481	123,969,688	271,827,529	398,652,659	355,196,945	305,187,945	245,480,357	168,974,611	87,472,000	60,801,441	23,682,601	2,948,801	457
Mult-Family 2-3 Units	1,697	6,970,000	6,740,000	6,950,000	8,020,000	16,634,000	14,911,000	12,071,100	8,770,000	6,817,000	4,871,000	3,428,811	11,473,911	11,473,911	4,026
1" 3"	1,698	4,300,000	4,300,000	4,300,000	4,300,000	8,600,000	8,600,000	8,600,000	8,600,000	8,600,000	8,600,000	8,600,000	8,600,000	8,600,000	8,600,000
1.5" 3"	79	4,472,000	34,000,000	34,000,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000
2" 3"	2	20,000	396,000	403,000	1,910,000	986,000	750,000	580,000	410,000	210,000	110,000	60,000	10,000	1,000	
Mult-Family 4+ Units	45	271,000	271,000	271,000	271,000	542,000	450,000	360,000	271,000	180,000	90,000	45,000	225,000	225,000	75
1" 4"	45	271,000	271,000	271,000	271,000	542,000	450,000	360,000	271,000	180,000	90,000	45,000	225,000	225,000	75
1.5" 4"	2	20,000	396,000	396,000	403,000	1,910,000	986,000	750,000	580,000	410,000	210,000	110,000	60,000	10,000	1,000
2" 4"	79	4,472,000	34,000,000	34,000,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000
3" 4"	2	20,000	396,000	396,000	403,000	1,910,000	986,000	750,000	580,000	410,000	210,000	110,000	60,000	10,000	1,000
4" 4"	79	4,472,000	34,000,000	34,000,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000	3,590,000
6" 4"	2	20,000	396,000	396,000	403,000	1,910,000	986,000	750,000	580,000	410,000	210,000	110,000	60,000	10,000	1,000
Total Multi-Family	6,329	21,423,000	21,423,000	21,423,000	21,423,000	42,846,000	36,374,000	28,942,100	21,423,000	16,971,000	8,485,500	4,242,750	21,423,000	21,423,000	725
Irrigation Accounts - Inside	129	20,000	15,000	15,000	15,000	30,000	20,000	15,000	15,000	15,000	15,000	15,000	15,000	15,000	15,000
3" 4"	129	20,000	15,000	15,000	15,000	30,000	20,000	15,000	15,000	15,000	15,000	15,000	15,000	15,000	15,000
3" 6"	5	5,000	5,000	5,000	5,000	10,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000
4" 6"	4	4,000	4,000	4,000	4,000	8,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000
6" 6"	11	11,000	11,000	11,000	11,000	22,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000
8" 6"	1	1,000	1,000	1,000	1,000	2,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
Wholesale City - Irrigation	3	5,000	5,000	5,000	5,000	10,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000
3" 4"	3	5,000	5,000	5,000	5,000	10,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000
3" 6"	1	1,000	1,000	1,000	1,000	2,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
4" 6"	1	1,000	1,000	1,000	1,000	2,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
6" 6"	1	1,000	1,000	1,000	1,000	2,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
Irrigation Accounts - Outside	3	2,000	2,000	2,000	2,000	4,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000
1.5" 4"	3	2,000	2,000	2,000	2,000	4,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000
Total Irrigation	34	29,000	20,000	20,000	20,000	40,000	27,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000
Commercial - Inside No WOC	141	6,427,000	3,729,000	5,000,000	6,500,000	12,500,000	11,000,000	10,500,000	9,500,000	8,500,000	7,500,000	6,500,000	5,500,000	4,500,000	3,500,000
3" 3"	141	6,427,000	3,729,000	5,000,000	6,500,000	12,500,000	11,000,000	10,500,000	9,500,000	8,500,000	7,500,000	6,500,000	5,500,000	4,500,000	3,500,000
3" 4"	66	4,020,000	2,400,000	3,200,000	4,200,000	8,400,000	7,400,000	7,000,000	6,300,000	5,600,000	4,900,000	4,200,000	3,500,000	2,800,000	
1.5" 2"	66	4,020,000	2,400,000	3,200,000	4,200,000	8,400,000	7,400,000	7,000,000	6,300,000	5,600,000	4,900,000	4,200,000	3,500,000	2,800,000	
2" 2"	11	1,000,000	1,000,000	1,000,000	1,000,000	2,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	
2" 4"	11	1,000,000	1,000,000	1,000,000	1,000,000	2,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	
3" 4"	3	600,000	600,000	600,000	600,000	1,200,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	
4" 4"	3	600,000	600,000	600,000	600,000	1,200,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	
6" 4"	3	600,000	600,000	600,000	600,000	1,200,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	
8" 4"	3	600,000	600,000	600,000	600,000	1,200,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	
10" 4"	3	600,000	600,000	600,000	600,000	1,200,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	
12" 4"	3	600,000	600,000	600,000	600,000	1,200,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	
14" 4"	3	600,000	600,000	600,000	600,000	1,200,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	
16" 4"	3	600,000	600,000	600,000	600,000	1,200,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	
18" 4"	3	600,000	600,000	600,000	600,000	1,200,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	
20" 4"	3	600,000	600,000	600,000	600,000	1,200,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	
22" 4"	3	600,000	600,000	600,000	600,000	1,200,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	
24" 4"	3	600,000	600,000	600,000	600,000	1,200,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	
26" 4"	3	600,000	600,000	600,000	600,000	1,200,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	
28" 4"	3	600,000	600,000	600,000	600,000	1,200,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	
30" 4"	3	600,000	600,000	600,000	600,000										

Appendix B

Supplemental Sewer Information

**City of Loveland
Billed Sewer Flow Analysis by Customer Class by Year
Fiscal Years 2000 Through 2006**

Class	2006			2005			2004			2003		
	WQA*	Counts**	Billed Flow/In.	WQA*	Counts**	Billed Flow/In.	WQA*	Counts**	Billed Flow/In.	WQA*	Counts**	Billed Flow/In.
Residential	4,423	19,314	85,424,941	4,189	19,231	80,560,959	4,331	18,508	80,154,658	4,582	17,818	81,821,685
Multi-Family	3,378	5,313	21,327,800	3,857	6,303	21,161,805	3,473	5,823	20,573,284	3,648	5,758	21,003,624
Commercial	33,796	989	33,792,598	30,731	984	30,547,078	29,066	959	27,874,182	33,844	971	32,862,533
Industrial	404,375	4	1,617,500	19,410,000	4	1,580,833	18,970,000	4	1,752,167	22,917	1	22,917
Government - City	52,063	32	1,666,019	19,892,233	34	1,720,320	20,643,840	33	1,768,959	55,954	32	1,790,521
Totals	497,976	26,682	143,738,858	494,083	26,566	135,570,965	528,439	25,427	132,122,760	120,955	24,580	137,501,279

Class	2002			2001			2000		
	WQA*	Counts**	Billed Flow/In.	WQA*	Counts**	Billed Flow/In.	WQA*	Counts**	Billed Flow/In.
Residential	4,878	16,898	82,433,465	4,778	16,231	77,788,969	5,181	15,601	80,981,045
Multi-Family	3,622	5,752	20,833,171	3,855	5,194	19,908,180	3,932	4,984	19,598,072
Commercial	34,042	945	32,183,361	35,182	913	32,121,032	37,276	917	34,182,324
Industrial	22,750	1	22,750	23,333	1	23,333	27,250	1	27,250
Government - City	53,880	31	1,870,282	66,558	31	2,063,283	81,470	30	2,444,104
Totals	119,172	23,627	137,128,019	133,706	22,390	131,905,798	153,119	21,533	137,232,785

Class	7-Year Average		
	WQA	Counts**	Billed Flow/In.
Residential	4,626	17,664	81,309,387
Multi-Family	3,609	5,742	20,628,577
Commercial	33,411	967	31,922,730
Industrial	190,554	2	720,964
Government - City	59,159	32	1,874,700
Totals	291,358	24,398	136,457,358

Class	COS Test Year 2008		
	WQA	Counts**	Billed Flow/In.
Residential	4,626	20,245	93,653,370
Multi-Family	3,609	6,503	23,471,185
Commercial	33,411	1,053	35,181,783
Industrial	190,554	4	782,214
Government - City	59,159	32	1,893,074
Totals	291,358	27,837	154,961,627

* For classes not billed by winter quarter average, the annual usage for the class was divided by twelve.
 ** Count for Multi-Family class includes number of units, not number of taps.

Section 8 – Technical Support Appendices

Appendix 8.K

Air Quality Permit

The City has applied for construction permits for the WWTP as discussed in Section 4.6, but has not received any permits to date. The most recent correspondence regarding air permitting is enclosed.



11/13/2009

Mr. Michael J. Harris, P.E.
Stationary Sources Program
Air Pollution Control Division
Colorado Department of Public Health and Environment
APCD-SS-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530

**RE: Facility Wide Permit Application #09LR0212
City of Loveland Wastewater Treatment Facility**

Dear Mr. Harris:

As you may remember, we have recently completed a construction project at our Wastewater Treatment Plant which included the installation of a 1,482 hp Cummins generator for emergency backup power and for use in peak shaving. This project started in early November of 2007. At that time it was anticipated that a separate APEN for this generator was all that was required to operate this generator as facility wide emissions based on APEN reportable sources were below permitting levels and therefore didn't require a permit. However, that same month the Denver ozone non-attainment zone was redefined and the area surrounding our plant was included in the new non-attainment zone. With the lowered permitting levels associated with inclusion in the non-attainment zone, facility emission totals were then above permitting levels for VOCs. This required us to submit a facility wide air permit application. Along with the new 1,000 KW Cummins generator, this permit application included reclassifying the use of our existing 600 KW Cummins generator to include peak shaving along with emergency backup power and the inclusion of our plant in the non-attainment area required us to submit a facility wide air permit application. You kindly advised us that we could qualify as a synthetic minor contributor by agreeing on limitations on the total hours of use for these two generators. You also requested updated APEN's for the waste gas flare (02LR0076) and the Wastewater Treatment facility (96LR431).

I updated all APENS's for all sources at our facility. Where appropriate, they are based on actual 2008 data. Additionally, to satisfy the energy demand management goals of our Power Division, this updated application requests operating hours of 800 hours/year for the both generators.




Our consulting engineers, CH2M Hill, reviewed this application and noted a discrepancy in the AIR ID numbers for the Digester Flare source, 02LR0076, and the Wastewater Treatment source, 96LR431. Both APEN's had AIR ID number 089/0076/001. Additionally, the old generator, ENG01 - #04LR0076, has the AIR ID 069/0308/003. My research indicates that this air ID was assigned to the Wastewater Treatment source, 96LR431, in the 1992 APEN submittals from our facility. We are thus requesting that your department review AIR ID numbers in this submittal and correct or reissue AIR ID numbers as you deem necessary.

I also wanted to reassure you that we are not using the new 1,000 KW generator for peak shaving or emergency backup yet. We are still installing the programming for the peak shaving mode and working on operating procedures. During generator testing while installation was taking place, several problems with equipment restarting was observed. We have reprogrammed much of this sequence and are awaiting approval from the Air Pollution Control Division to proceed further.

Should you have any questions regarding the application, please contact me at (970) 962-2572.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael McCrary", is enclosed within a hand-drawn oval.

Michael McCrary
Wastewater Treatment Plant Manager

Enclosure

CC: Steve Adams, Water Utilities Manager
Bob Miller, Power Operations Manager

Section 8 – Technical Support Appendices

Appendix 8.L

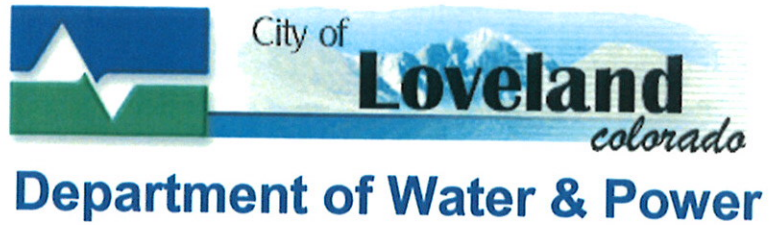
Odor Control Studies

The most recent odor management study for the WWTP from 2005 is enclosed.

1

2

3



Wastewater Treatment Plant Odor Management Phase 2

Project W428HG

Final Report

Prepared by



May 2005

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Executive Summary

This Odor Management Plan presents the results of the odor impact assessment conducted by CH2M HILL for the City of Loveland's Wastewater Treatment Plant (WWTP). The objectives of this odor assessment were to determine the treatment plant's baseline odor impacts to the surrounding community and evaluate potential odor control improvements.

An assessment of the WWTP's odor impacts on the surrounding area was conducted with extensive sampling and odor dispersion modeling. The results of the modeling were used to quantify the WWTP's odor impact, to prioritize the potential odor sources, and to develop a phased list of capital improvements that the City will implement as-needed to reduce the offsite impacts and comply with State of Colorado regulations.

Setting Odor Prevention and Control Criteria

A key objective to a successful odor assessment and control program is to determine what level of odor will cause an odor nuisance response by the public, and then control odors to levels lower than these thresholds. It is not reasonable to expect that a treatment plant will never have odors. Neighbors of treatment plants will typically tolerate odors for small portions of time. Treatment plants located in residential communities typically have odor goals of ranging from 4 to 20 dilutions-to-threshold (D/T), with an allowance of 100 hours per year to exceed the threshold. The allowance is to provide a margin of error. Under normal operating conditions the plant is expected to meet its odor threshold. However, plant upsets and equipment failures can and do occur. These abnormal operations would be acceptable within the time period allotted for the allowable hours above the threshold. Commercial/industrial communities typically have odor goals of 20 D/T or higher, with a similar allowance of 100 hours a year to exceed the threshold.

The State of Colorado (State) regulates odors under Regulation 2, Part A – General Provisions. The regulation states that there should be no detectable odors at the site of odor impact after the odorous air is diluted by 7 volumes of odor-free air or more where the land use is either predominantly commercial or residential. For all other land uses the dilution is 15 odor-free air volumes or more. Since the City's WWTP is adjacent to many residential areas, 7 dilutions to threshold (D/T) is the appropriate criterion for the WWTP. To determine compliance with this regulation, the State does not perform any routine sampling of odors. Any testing done by the State would likely be done as the result of a complaint. When the State does come out to sample, they would determine compliance if two samples exceed the standard within a one-hour period.

As part of this Odor Management Project, CH2M HILL has developed an odor control capital improvement program that should allow the City to comply with the State Standard. Due to the conservative nature of the analysis conducted, CH2M HILL recommends that the improvements recommended meet a model-predicted odor control goal that the odor emissions will be less than 7 dilutions-to-threshold (D/T) 99 percent of the time.

Baseline Modeling

The baseline or current odor modeling assessment used emission rates obtained from the two odor sampling events conducted at the Loveland WWTP during 2003 and 2004. The purpose of the two sampling events was to capture the main odor generation periods when the City tends to see the most odor complaints, summer and fall. The first sampling was conducted with the Jerome 631-X hydrogen sulfide (H₂S) analyzer. This sampling event collected H₂S concentration data during 30 sampling rounds from October 2 to October 23, 2003. The second sampling event was conducted using an Environmental Protection Agency (EPA)-approved flux chamber to capture the odor emissions from the plant processes. This was a one-day sampling event conducted on June 2, 2004. Laboratory measurements of ammonia, reduced sulfur compounds, and odor (analysis by an odor panel) were obtained. The sampling results indicate that the odor from the Loveland WWTP is caused by more than just H₂S. To account for the combined effect of all odorous compounds, odor was modeled instead of just H₂S.

CH2M HILL entered odor emission rates from the source sampling and source parameters into an odor dispersion model, Industrial Source Complex – Short Term Version 3 (ISCST3). This model predicted off-site odor impacts at numerous receptor locations surrounding the Loveland WWTP site. Five years of meteorological data from Fort Collins-Loveland Airport were initially evaluated (1999 – 2003); 2003 was the year that resulted in the highest off-site impacts. Therefore, only 2003 meteorological conditions were modeled in subsequent model runs. It is standard practice to use meteorological data from the nearest airport when the local site does not have an on-site meteorological station; however, there may be some slight differences in wind speed and direction due to local topography at the Loveland WWTP.

The baseline odor assessment included all of the treatment processes that are typically on-line in the summer. Two scenarios were modeled based on the two sampling events, capturing the seasonal periods when odor complaints are received: “worst-case” and “one-day”. Both baseline model results were compared to the odor threshold of 7 dilutions-to-threshold (D/T), which is consistent with the State of Colorado standard.

Worst-Case Baseline: Jerome meter sampling data as the model input. Jerome meter sampling was conducted over a three-week period. The highest concentrations for each source were selected to represent the worst-case scenario.

One-Day Baseline: Based on flux chamber sampling data as the model input. The flux chamber sampling was conducted on a single day.

The worst-case baseline is considered a worst-case because the sampling event took place in the fall, when odor complaints tend to be highest, and the highest emissions sampled over a period of three weeks were selected. In addition, the worst-case baseline uses H₂S emissions converted into total odor (D/T) while the one-day baseline uses D/T sampled from the main odor sources. The method of conversion (explained in more detail in the main report) adds some additional conservatism to the worst-case baseline. The one-day baseline may be closer to an overall average, or more “typical” day. The sampling was conducted on a single-day, with some of the sources sampled in the early morning. There may also be some differences in results due to type of measurement tool used, time of sampling event, and plant loading/operating conditions, but using the worst-case baseline to prioritize the odor

sources will provide the highest odor emissions potential. Under normal or average conditions, the plant's odors will be much lower, and even lower with controls. This conservative approach helps to ensure that the recommendations made will reduce the off-site impacts significantly.

Baseline Results

The worst-case baseline (based on the Jerome meter sampling) which includes the odor impact from all the existing sources at the Loveland WWTP and is based on a 5-minute averaging period, shows the isopleths, or contours, with the hours of yearly exceedance of an odor standard of 7 D/T. This baseline is illustrated in Figure 1. There is a significant off-site area that can perceive the 7 D/T or higher odor levels greater than 100 hours per year. A similar isopleth was created for the one-day baseline (flux chamber sampling) modeling results, shown in Figure 2. The one-day baseline represents a typical day without much noticeable odors in the community surrounding the Loveland WWTP. It shows much smaller impact area focused on the north end of the plant. As described above, the worst-case baseline is intended to capture the worst possible odor impact and is a more conservative approach, which explains the much larger odor impact.

The highest off-site odor impacts from both baseline models were tabulated by odor source to assess their contribution to off-site impacts. This information also allows control efficiency requirements for each odor source to be determined for the plant to meet the odor standard. Table ES-1 presents the maximum 5-minute odor impacts and maximum annual average odor impacts expressed as D/T for each major odor source. The maximum 5-minute odor impacts is the highest D/T predicted at an off-site receptor (location surrounding the plant site) and the annual average D/T is average D/T predicted at an off-site receptor. Figure 3 shows the receptors where the highest maximum 5-minute D/T occurred for all sources combined (Receptor A) and where the highest annual average exceedance occurred for all sources combined (Receptor B). The ratio of the maximum annual odor to the maximum 5-minute odor, peak-to-mean ratio, is a parameter indicating the frequency of the maximum odor occurrence, and is also shown in the table. Note that the maximum odor source impacts are not cumulative because they occur at different times and locations.

TABLE ES-1

Maximum 5-Minute and Annual Average Odor Impacts from Existing Sources at Fenceline Receptors

Source Group	Worst-Case Baseline (Jerome Meter Data)			One-Day Baseline (Flux Chamber Data)		
	Max 5-min D/T	Avg Annual D/T	Peak-to- Mean (5-min D/T)/ (Annual D/T)	Max 5-min D/T	Avg Annual D/T	Peak-to- Mean (5-min D/T)/ (Annual D/T)
All Source	1,128	20.3	55	136	2.2	61
Digester Boiler Room Vent	1,000	18.0	56	67	1.2	56
Aerated Grit Basin	857	3.5	242	71	0.3	238
DAFT	233	0.8	293	50	0.2	293
Trickling Filter	174	1.3	132	70	0.5	133
Screw Pumps	163	1.5	107	18	0.2	107
Primary Clarifier	146	0.7	197	49	0.3	159
Flare	79	0.6	134	3	0.0	135
Headworks Door	30	0.5	63	3	0.0	63
Aeration Basins	28	0.4	69	81	1.0	81
Headworks Building Exhaust	5	0.1	70	1	0.0	69
Digesters	1	0.0	98			
Biosolids Loading	0	0.0				

Predictions based on 2003 surface meteorological data from Fort Collins-Loveland Airport.

Model output was converted to 5-minute average concentrations using a factor of 1.64.

For the worst-case baseline, the maximum combined 5-minute odor impact from all the sources was 1,128 D/T, which is significantly higher than the odor threshold of 7 D/T. The maximum combined 5-minute odor impact from the digester boiler room vent was 1,000 D/T at the fenceline. The digester boiler room vent is the most significant contributor to the off-site odor impact in terms of strongest odors. The next source having the highest maximum 5-minute odor impact is the aerated grit chamber, which generated 857 D/T of maximum 5-minute odor impact at the fenceline. The ratio of maximum 5-minute odor to the maximum annual odor at the digester boiler room vent was only 56, suggesting the mean impact from this source is almost as significant as the peak impact. In contrast, the peak-to-mean ratio for the aerated grit basin was 242, suggesting that this odor source is less chronic and more acute in nature.

The baseline results from both scenarios are much higher than the state standard of 7 D/T, which is an extremely stringent odor threshold to attain and maintain over an entire year. In the worst-case baseline, the worst-case odor emission rates were used and applied over the entire year, regardless of seasonal conditions. This approach ensures that the highest

potential odor release scenarios are covered and that the plant will normally have odor emissions that are well below these conservative estimates, with the odor controls recommended.

The ranking of the odor sources was based on the maximum 5-minute odor strength (D/T) and the peak-to-mean ratio analysis from the Worst-Case baseline model. Figure 4 summarizes the ranking of the major odor sources at the plant. The remainder of the analyses conducted were focused on the Worst-Case baseline since those odor impacts are more consistent with the odor complaints from the surrounding community.

Modeling of Odor Control Alternatives

With the major odor sources identified using the baseline modeling, odor control alternatives were considered to reduce the odor emissions from the major sources. The baseline model was then revised to represent the off-site odor impact changes due to an odor control improvement. Seven odor control scenarios were modeled in this analysis to investigate the effect of positively controlling the odor sources. The odor control improvements either eliminate the identified big odor sources completely, such as the trickling filters, or convert the major odor sources into the odor control scrubbers that emit significantly less odor, such as the chemical scrubber treating the Headworks and grit chambers at Stage 4. The major sources controlled were selected based on the prioritization in baseline modeling. The conditions represented in these seven odor control scenarios are shown below in Table ES-2. The check marks indicate which proposed odor control improvements (shown in rows) were modeled in each control scenario (shown in columns).

As shown later in the report (Figures 16-22), the control modeling results show that odor control approaches represented in Stages 1 through 7 can drastically reduce the off-site impacts to levels of insignificance outside the plant fence line. The modeling results predict that the Loveland WWTP would meet their desired odor control goal of less than 7 D/T 99 percent of the time at Stage 7. However, due to the conservative nature of the modeling analysis, CH2M HILL recommends that the City implement Stages 1 through 5 to meet the State Standard. At that point, the City should continue to monitor their progress to see if additional odor control is required.

TABLE ES-2
Conditions Represented in the Odor Control Modeling

Odor Control Project	Description	Stage 1	Stage 2	Stage 3	Stage 4	Stage 5	Stage 6	Stage 7
Trickling Filters	Discontinue the use of trickling filters.	✓	✓	✓	✓	✓	✓	✓
Digester Boiler Room Vent	Eliminate the fugitive odors being collected in the HVAC exhaust		✓	✓	✓	✓	✓	✓
Aerated Grit Chamber	Cover aerated grit chamber and install a new carbon unit to treat the air from grit chamber (95% odor removal)			✓	✓	✓	✓	✓
Headworks Building	Ventilate new or modified Headworks building at 12 ACH. Provide a new chemical scrubber to treat the air from both the aerated grit chamber and the Headworks building (99% odor removal). Replace screw pumps or cover and ventilate to the odor control scrubber.				✓	✓	✓	✓
DAFT	Maintain negative pressure inside DAFT by providing 12 ACH ventilation. Add a new carbon unit to treat the air from DAFT (95% odor removal)					✓	✓	✓
Primary Clarifiers	Cover and vent primary clarifiers to odor control scrubber (95% removal efficiency)						✓	✓
Aeration Basins and Digesters	Cover and vent aeration basins to odor control scrubber (95% removal efficiency). Provide odor control for digesters with fixed roof tanks.							✓

Liquid Phase Treatment

Literature and CH2M HILL's experience indicates that liquid phase treatment of odor generating compounds in the collection system forms a cost effective component of multi-phased odor management plans for wastewater treatment facilities when the influent dissolved sulfide concentrations exceed 1.0 milligrams per liter (mg/L). For the City's collection system, the modeling and sampling conducted indicate that the City has influent wastewater dissolved sulfide concentrations greater than 5 mg/L.

The analysis conducted indicates that the Boyd Interceptor and Boyd Relief Interceptor contribute most to the sulfides at the plant. The Southside Interceptor contributes a small portion of the overall sulfide loading to the plant, but the sampling program showed that the forcemain discharge generates high peak hydrogen sulfide concentrations within the Headworks area. These peaks likely generate short-term odor releases that could lead to

odor complaints. CH2M HILL recommends an odor management strategy that addresses both of these contributors.

CH2M HILL has considered several sulfide control options. Ferric Chloride addition has the second highest life-cycle costs and ranks third in the non-economic evaluation. Ferric chloride requires special handling procedures and is a corrosive product. Bioxide™ provides the lowest life-cycle cost, but may require more stations than ferric chloride. However, the product is relatively harmless and does not have the same handling and storage requirements. The Town of Castle Rock, Colorado has used Bioxide™ to control odors in their interceptors. There are also numerous Bioxide-equivalent products that can be used.

CH2M HILL recommends that the City begin with Bioxide™ (or equivalent) on the basis that it is the most cost effective and will be added at the lift stations, which will provide an additional benefit of corrosion control in the collection system. The City should consider contacting Castle Rock, Colorado staff regarding their Bioxide™ program and its success. The following approach is suggested for proceeding with the liquid phase, sulfide control program:

1. Conduct a pilot test with Bioxide™ (or equivalent) being added at the Eastside lift station. During the pilot test, conduct sampling of both the dissolved sulfide levels of the influent and the H₂S concentrations at the odors sources.
2. If the pilot test is effective, implement permanent Bioxide™ (or equivalent) dosing stations for Boyd systems first (Eastside and Boyd Lake lift stations), then addresses the smaller contributors should further odor reductions be needed.
3. If the Bioxide™ is not effective, conduct a pilot test with another liquid phase treatment chemical, such as ferric chloride.
4. Commit to a data collection program that will allow stakeholders to evaluate the impact of the proposed mitigation measures. The data collection program would involve monthly sampling of the dissolved sulfide levels at the influent, as well as sampling the odor sources for H₂S using a Jerome meter.

Recommendations

A summary of the recommended long-term improvements, with cost estimates, are included in Table ES-3. CH2M HILL recommends that the City plan to incorporate Stages 1 through 5 in their current CIP, at a capital cost of \$1.3 million. It is anticipated that this level of odor control will meet the State Standard, given the conservative nature of the analysis. For the City to have a zero odor emissions plant, Stage 6 and 7 would be necessary, and the additional the cost would be approximately \$5 million. Therefore, to meet the State Standard, the cost would be \$1.3 million and the cost to meet a zero odor emissions goal would be \$6.3 million total.

The average annual costs are also estimated in Table ES-3. For future operations at the Loveland WWTP with full scale odor control, the annual operating costs for odor control could be as high as 5 to 15 percent of the annual operating budget. This is what a typical WWTP spends on odor control.

The cumulative odor reduction to be expected from each odor control stage, including liquid phase treatment, is shown in Figure 5. It is assumed that liquid phase treatment is implemented after the trickling filter is taken off-line (Stage 1) and the digester boiler room HVAC intake vent is relocated (Stage 2). For Stages 3 through 7, the predicted odor reduction is shown for each stage with and without the cumulative impact of liquid phase treatment. As additional odor control improvements are implemented, the additional odor reduction impact of liquid phase treatment becomes insignificant. However, liquid phase treatment continues to have benefit by reducing the chemical requirements for the odor control scrubbers.

Plant emissions are variable and so are removal efficiencies of odor control systems. After each phase of capital improvements, the sources should be re-sampled and the odor dispersion model re-run to predict the current plant conditions. This will enable the City to assess the effectiveness of the phased recommendations and confirm if all the capital improvements below are required, or if there are other new odor sources that require control. The cost of a Jerome meter is included in Odor Control Stage 3 so the City can conduct the confirmation sampling. The effort to re-run the dispersion model is included in Stage 4 to confirm the odor control benefits of the stages up through Stage 4. The long-term recommendations provided in Table ES-3 may or may not be necessary in the future, and careful evaluation should be performed before implementation.

Prior to this study, the City was already planning to implement odor control improvements to help reduce the off-site odor impacts. Table ES-4 presents a comparison of the odor control improvements to the City's current five year capital improvement projects (CIP) intended for odor control. It is recommended that the City update their CIP to be consistent with the recommendations presented in Table ES-3 when they conduct the annual review of the CIP.

The City currently has a total of approximately \$850,000 set aside for odor control improvements during 2005 through 2006. To implement Stages 1, 2, and 3 along with liquid phase treatment will only cost the City approximately \$300,000. Stage 4 is the next odor control improvement recommended that will have a significant impact on the off-site odor reductions. If the City can increase the budget for the odor control improvement projects in 2005 and 2006, it is recommended that the odor control scrubbers recommended in Stage 4 be installed to provide odor control for the current Headworks facility. These scrubbers can be reused for the new Headworks facility, especially if the City is going to maintain the current Headworks building. Also, the City should consider implementing the new Headworks facility earlier than currently planned.

TABLE ES-3
 Cost Summary for Long-Term Recommendations

Odor Control Stage	Long Term Recommendations	Air Flow Rate (cfm)	Capital Cost*	Annual Cost	Timing
1	Discontinue use of trickling filters	NA	\$10,000	\$0	2004
2	Rearrange digester boiler vent HVAC system	NA	\$200,000	\$0	2005
LPT	Conduct a pilot test of Bioxide™ or equivalent chemical	NA	\$37,000	NA	2005
	Implement a liquid phase treatment program	NA	\$35,000	\$68,000	2005
3	Cover aerated grit chamber and vent to a carbon scrubber	250	\$68,000	\$6,000	2005
4	Provide odor control for modified Headworks processes, including screw pumps and influent collection well, within existing Headworks building. Vent air from Headworks building through a new chemical scrubber polished with bioscrubber or carbon to achieve 99% removal efficiency.	13,000	\$892,000	\$87,000	2006 / 2009
5	Vent air from DAFT in a new carbon scrubber.	800	\$84,000	\$18,000	2008
6	Cover primary clarifiers and vent to new chemical scrubbers	3,800	\$1,614,000	TBD	TBD
7	Cover aeration basins and vent to new chemical scrubbers. Replace digester covers with fixed roof covers	8,600	\$3,353,000	TBD	TBD

*Total capital costs include construction and engineering costs. Construction costs include 30% contingency; engineering costs are estimated at 25% of construction cost

cfm = cubic feet per minute

TABLE ES-4

Odor Control Recommendations Compared to Current C/PA

Odor Control Project	2005	2006	2007	2008	2009	Project Recommendations (Odor Control Stage)
Design & SDC odor control	\$70,000	\$72,100				Discontinue use of trickling filters, relocate digester room HVAC intake vent, liquid phase treatment, and install new odor control scrubber for aerated grit chamber (Stages 1-3)
Construction odor control	\$350,000	\$360,500				
Replace existing screw pumps ^b	\$30,000	\$339,900				
Design and SDC WAS Thickening ^b		\$372,345	\$191,759	\$197,511		Provide odor control as part of WAS thickening improvements (Stage 5)
Construction WAS Thickening ^b			\$1,538,305	\$1,584,455		
Design and SDC Influent Pumping and Headworks Facility ^b					\$514,921	Provide odor control as part of Influent Pumping and Headworks Facility Improvements – project extends beyond 2009 (Stage 4)
Construction Influent Pumping and Headworks Facility ^b					\$1,716,400	

^aCosts include an annual inflation factor

^bCost included for these projects is for the entire project, which includes design and construction of new process facilities, where odor control is portion of that project

Introduction

Wastewater treatment plants have inherent odors based on the nature of biological processes. Currently, a majority of odor complaints related to the Loveland WWTP occur in the late fall and winter, as the temperature changes from warmer to colder. Odor complaints have also been received on summer evenings and weekends when more people are at home and outside near the WWTP, making it easier to notice odors. Odor complaints may be increasing because development is moving closer to the WWTP, as reflected in new construction within 400 feet to the north of the plant. An aerial photograph of the Loveland WWTP and surrounding area is included on Figure 6.

The prevailing wind direction is blowing from the southwest, as indicated by the windroses included in Appendix A. The prevailing winds are blowing directly towards the new residential developments and what is currently undeveloped land. This undeveloped land is slated for future development, which will increase the likelihood of odor complaints if conditions remain the same at the WWTP.

The Loveland WWTP is currently undergoing expansion to meet new and more stringent wastewater treatment regulations. The current construction project started in June 2003 and will be completed by November 2004. The process changes that will be conducted as part of the construction project are to change the existing activated sludge process to a step-feed, increase aeration basin volume, install an ultraviolet disinfection system, abandon the existing chlorine contact basin, and provide significant improvements to the electrical system. The changes to the aeration basins will allow elimination of the trickling filter process, which will reduce the odor emissions at the plant.

The State regulates odors under Regulation 2, Part A – General Provisions, which is provided in Appendix B to this TM. The regulation states that there should be no detectable odors at the site of odor impact after the odorous air is diluted by 7 volumes of odor-free air or more where the land use is either predominantly commercial or residential. For all other land uses the dilution is 15 odor-free air volumes or more. Since the City's WWTP is adjacent to many residential areas, 7 dilutions to threshold (D/T) is the appropriate criterion for the WWTP. Odor emissions are generally measured and regulated in terms of odor strength or D/T, which quantifies the degree of odor perception of a whole air sample. D/T is defined as the point where the odor is barely perceptible to the sampler. The number of dilutions of pure air required to barely perceive the odor then indicates the strength of the sample. Relatively speaking, the higher D/T number, the stronger the odor.

In 2003, CH2M HILL conducted a baseline odor sampling event for the City of Loveland using H₂S as a representative for total odor. The purpose of the sampling work was to assist the City to act quickly to understand and continue to mitigate potential offsite odors. The sampling results from this baseline odor sampling are documented in the *City of Loveland Wastewater Treatment Plant Odor Sampling Technical Memorandum* (CH2M HILL, 2004). The results were used to initially rank odor sources and prioritize recommended improvements. The odor sources found to be significant in the baseline sampling were targeted during the comprehensive odor study as part of the odor management study conducted in 2004.

documented in this Odor Management report. This report uses information developed in 2003 and provides updated recommendations for the City to reduce the odor impacts to the surrounding community.

CH2M HILL developed this odor management plan for the Loveland WWTP on behalf of the City. The goals and objectives of the odor management project were to understand existing odor sources, determine the off-site odor impacts, rank the odor sources, and propose an odor control improvements program that will be integrated into the City's capital improvement program (CIP). To understand existing odor sources, field investigations were performed to locate existing odor sources and sample each source's H₂S level. Hydrogen sulfide was used as a surrogate for odor in the initial testing and targeted sources were later sampled for odor as well as H₂S and ammonia. The sampling data was used to develop an odor impact model of the existing treatment plant. After the odor sources were identified, odor control measures were modeled to show the potential reduction in off-site odor impacts.

Current Odor Control at Loveland WWTP

Prior to 1986, the City has relied primarily on operational practices to reduce off-site odor impacts and there was no odor control equipment at the WWTP to reduce the off-site odor impacts. In 1986, due to increasing odor awareness, the City installed the carbon scrubber in the Headworks building to reduce the off-site odor impacts from the grit removal and screenings processes. It was acknowledged during the initial baseline study that the carbon scrubber was not providing effective odor control since the carbon in the scrubber was plugged and not removing odors from the Headworks Building. The City replaced the carbon in March 2004, which has significantly reduced the odors being released from the Headworks Building. Figure 7 shows the offsite odor impact for the Loveland WWTP prior to the carbon changeout. However, odor awareness continues to increase among the neighbors of the WWTP. In response to this increased odor awareness, the City has begun to plan for and implement odor control for the significant odor sources as part of this study.

Setting Odor Prevention and Control Criteria

Odors are highly subjective in nature and each person can have a unique response or reaction to odors at various concentration levels. A key objective to a successful odor assessment and control program is to determine what level of odor, as sensations (subjective phenomena) versus odorant emissions (objective phenomena), will cause an odor nuisance response by the public, and then control odors to levels lower than these thresholds. Successful WWTPs have tended to set their standards together with the surrounding community through a process of trial and error.

It is not reasonable to expect that a treatment plant will never have odors. Neighbors of treatment plants will typically tolerate odors for small portions of time. Treatment plants located in residential communities typically have odor goals of ranging from 4 to 20 dilutions-to-threshold (D/T), with an allowance of 100 hours per year to exceed the threshold. The allowance is to provide a margin of error. Under normal operating conditions the plant is expected to meet its odor threshold. However, plant upsets and

equipment failures may occur. These abnormal operations would be acceptable within the time period allotted for the allowable hours above the threshold. Commercial/industrial communities typically have odor goals of 20 D/T or higher, with a similar allowance of 100 hours a year to exceed the threshold.

A relationship between D/T and acceptable hours per year that the threshold D/T could be exceeded without becoming a nuisance odor was developed based on experience at other WWTPs. This relationship is described in Table 1. These standards were typically developed with the input of the surrounding community. The neighbors were included in decision-making sessions that determined how often the neighbors would tolerate odors above the threshold without complaining. These standards, when met, allow the community to gain trust in their neighboring WWTP. However, public response is highly subjective. A highly energized and sensitive community may have lower acceptable hours per year exceedence thresholds.

TABLE 1
Acceptable¹ Hours per Year of Odor Exceedance at Various D/T Ratios

Hours of Exceedence per Year	D/T Ratio				
	4	7	20	50	100
0-10	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable
10-50	Acceptable	Acceptable	Acceptable	Acceptable	Not Acceptable
50-100	Acceptable	Acceptable	Acceptable	Not Acceptable	Not Acceptable
100+	Acceptable	Not Acceptable	Not Acceptable	Not Acceptable	Not Acceptable

1. These acceptable hours are based on CH2M HILL's previous experience at several U.S. and global wastewater treatment and sludge lagoon facilities. However, public response is highly subjective and the above scenarios are intended as a planning guide only. A highly energized and sensitive community may have lower acceptable hours per year exceedence thresholds.

The State odor standard of 7 D/T or more is applicable at all times; it is not possible to obtain a waiver for certain times of the year or for a number of hours. However, to determine compliance with the regulation, the State does not perform any routine sampling of odors. Any testing done by the State would likely be done as the result of a complaint. When the State does come out to sample, they would determine compliance if two samples exceed the standard within a one-hour period. The State does take into account plant upsets and equipment problems that may cause the odors to exceed the limit. Other municipalities within Colorado have been successful by conducting public outreach to educate the surrounding community to call the WWTP with odor complaints rather than the State or county. As part of this Odor Management Project, CH2M HILL recommends has developed an odor control capital improvement program that will allow the City to comply with the State Standard. Due to the conservative nature of the analysis conducted, CH2M HILL recommends that the improvements recommended meet a model-predicted odor control goal that the odor emissions will be less than 7 dilutions-to-threshold (D/T) 99 percent of the time. This will allow the City to respect the boundaries between the community's odor objective and to be consistent with the State Standard.

Odor Complaint History

The City has a procedure in place for responding to odor complaints, which has assisted in expediting the process and response to odors. Odor complaints are received by the plant operator, who logs the complaint and attempts to identify the source of the odor. When possible, action is taken to minimize the release of odors. Follow-up with the residents is conducted if necessary. In March 2004, the City began to monitor the odor complaints received by maintaining detailed logs of each complaint. The area of the most documented odor complaints is highlighted in Figure 8. This figure was used to validate the modeling results to the actual odor impacts indicated by the odor complaints. This provides support for the modeling results and aids in meeting the project objectives. The odor complaints agree with the selected odor control threshold criteria, at less than 7 D/T 99 percent of the time.

Odor Sampling

Two odor sampling events were performed at the Loveland WWTP as part of this odor management study. The purpose of the two sampling events was to capture the main odor generation periods when the City tends to see the most odor complaints, summer and fall. The first sampling was conducted by CH2M HILL and Stewart Environmental, consisting of 30 sampling rounds from October 2 to October 23, 2003. The Jerome meter sampling covered a wide range of the potential odor sources and identified the sources to be sampled as part of the following flux chamber sampling. The second sampling event was conducted by Environmental Management Consulting, using an Environmental Protection Agency (EPA)-approved flux chamber to capture the odor emissions from the plant processes. This was a one-day sampling event conducted on June 2, 2004.

Jerome Meter Sampling

The Jerome H₂S analyzer, shown in Figure 9, measures instantaneous (less than 30-second sampling time) H₂S concentrations. The H₂S concentration data is converted to mass emission rates using assumed air velocities, but their reliability is usually limited by the difficulty of determining the airflow rates and the fact that only a single odor compound concentration is available.

The potential odor sources sampled were identified during a plant walk-through on October 1, 2003, based on the consultant's experience and group members' observation and experience. The plant sample locations are identified on Figure 10. Photographs of each of the sources are included in Appendix C. The Jerome meter sampling results are summarized in Table 2 and in Appendix D, which includes charts that show H₂S concentration over time for each odor source sampled.

Flux Chamber Sampling

With a flux chamber, samples are taken directly from the liquid surface through a closed vessel (innertube with a sampling port on top). The air flow off the liquid surface is measured as well as the mass or quantity of odorous compounds emitted. Together, these two measurements are the flux (or mass emission) of the compounds off the surface. This sampling method is illustrated in Figure 11. The air samples are analyzed in a laboratory for specific compounds and by an odor panel to determine odor intensity. Flux chambers provide the most accurate emission measurements from the surface areas.

During the flux chamber sampling event, stack testing and hand-held instruments such as the Jerome H₂S analyzer and gas detector tubes were also utilized to obtain the data on field H₂S, field ammonia, lab H₂S, lab reduced sulfur compounds, and odor panel responses (results expressed in D/T). Flux chamber sampling results are summarized in Table 3 and included in the Appendix E. The sampling results indicate that the odor from the Loveland

WWTP is caused by more than just H₂S. To account for the combined effect of all odorous compounds, odor was modeled instead of just H₂S.

TABLE 2
Summary of Loveland WWTP Jerome Meter Sampling Results

Location Number	Location Description	Total Number of Samples Taken	H ₂ S Concentration (ppm)		
			Average	Maximum	Minimum
1	Influent collection well	30	1.10	6.1	0.01
2	Grit hopper	30	2.33	4.7	0.61
3	Headworks odor control exhaust*	30	1.98	4.5	0.50
4	Headworks vent to 1st floor	30	2.84	7.1	0.57
5	Grit truck loading		Not sampled		
6	Headworks effluent channel	29	6.82	18	0.65
7	Aerated grit chamber	30	4.63	21	0.02
8	Aerated grit effluent channel	30	1.17	9.6	0.00
9	Screw pumps (bottom)	30	1.42	8.1	0.14
10	Screw pumps (top)	30	2.88	9.3	0.12
11	Primary splitter box	30	2.67	14.9	0.25
12	Primary clarifier W (center)	30	0.14	0.60	0.01
13	Primary clarifier W (effluent weir)	30	0.54	2.2	0.02
14	Primary clarifier E (center)	29	0.12	0.65	0.01
15	Primary clarifier E (effluent weir)	29	0.37	1.33	0.02
16	Primary effluent wetwell	30	3.45	31	0.14
17	Trickling filter E	30	0.80	3.0	0.03
18	Trickling filter W	30	0.91	2.5	0.02
19	Trickling filter effluent channel E	30	2.77	28	0.04
20	Aeration basin N	30	0.07	0.58	0.01
21	Aeration basin effluent channel	30	0.10	0.45	0.00
22	Final clarifier	30	0.02	0.25	0.00
23	DAF thickener	30	3.00	19	0.61
24	Anaerobic digester (cover)	30	4.54	22	0.04
25	Anaerobic digester (PRV)	28	1.23	31	0.00
26	Digester boiler room vent	30	1.31	17	0.01
27	E digester junction box	30	1.40	31	0.01
28	W digester junction box	30	9.53	31	0.01
29	Biosolids truck loading - at hatch	8	23.0	> 50	23
30	Ambient air 10' from truck loading	7	2.31	18	0.00
31	RAS well	28	0.05	0.33	0.00

*Prior to carbon replacement - after carbon replacement = 0.13 ppm H₂S

Date sampled: October 7-23, 2003 and June 2, 2004

ppm = parts per million

TABLE 3
Summary of Loveland WWTP Flux Chamber Sampling Results Based on Laboratory Analysis

Location Number	Location Description	Odor (D/T)	H ₂ S (ppmv)	Carbonyl Sulfide (ppmv)	Methyl Mercaptan (ppmv)	Dimethyl Sulfide (ppmv)	CDS (ppmv)	Dimethyl Disulfide (ppmv)
3	Headworks odor control exhaust	90	ND	0.017	ND	ND	0.0018	ND
7	Aerated grit chamber	4,000	26.1	ND	0.339	ND	ND	ND
12	Primary clarifier W (center)	2,400	0.75	ND	0.011	ND	ND	ND
13	Primary clarifier W (effluent weir)	4,400	9.61	ND	0.153	ND	ND	ND
18	Trickling filter W	2,700	7.07	ND	0.579	ND	ND	ND
20	Aeration basin N (Old)	370	0.001	ND	ND	0.0015	0.001	0.006
23	DAF thickener	4,400	9.65	ND	0.415	ND	ND	ND
28	W digester junction box	2,900	3.09	ND	ND	ND	ND	ND
29	Biosolids truck loading - at hatch	3,100	0.002	ND	ND	ND	ND	ND
32	Aeration basin (New)	1,500	ND	ND	ND	0.003	ND	0.027

ND = non detect
 ppmv = parts per million by volume
 Date sampled: June 2, 2004

In the flux chamber sampling, the new aeration basins had much higher odor levels (1,500 D/T) than expected based on the H₂S concentrations detected. There were significant levels of non-H₂S odorous compounds detected in those samples (dimethyl disulfide [DMDS] and dimethyl sulfide [DMS]) potentially contributing to the elevated odor concentration. Since the new aeration basins had only recently been started when the sampling was conducted, CH2M HILL believes that they are not a significant source of off-site odor impacts. To confirm this, it is recommended that the City resample the aeration basins when all the new basins are optimized.

Nasal Ranger Sampling

As part of both the Jerome Meter and Flux Chamber sampling events, additional sampling was conducted at the WWTP fenceline to determine H₂S and odor concentrations at the property line. A new product by St. Croix Sensory, Inc., called a Nasal Ranger Field Olfactometer, and shown on Figure 12, was used to determine the ambient odor dilution-to-threshold (D/T) values at the fenceline. This nasal organoleptic instrument directly measures and quantifies odor strength in the ambient air using the principle of mixing odorous ambient air with odor-free filtered air in discrete volume ratios. The user's nose is placed firmly inside the nasal mask against the replaceable "comfort seal". The user inhales through the nasal mask at a comfortable breathing rate. The ambient air can pass through an activated carbon filter to remove the odor and then mixed with the odorous ambient air in a discrete volume ratio. The mixed air will pass to the nose. The user chooses dilution factor by adjusting the rotational position of the Nasal Ranger D/T Dial to determine the orifice size and, therefore, the volume of odorous air that enters through the selected orifice.

The fenceline sample locations are identified on Figure 13. A summary of the fenceline sampling results is provided in Table 4, with the detailed results included in Appendix F. When measuring odor strength, the higher D/T number, the stronger the odor. The area to the west of the treatment plant near the Headworks Building had the most significant odors at the fenceline. On a few occasions the odors were found to be at or above 7 D/T, which is in exceedence of the state standard for residential areas. The highest odors detected along the fenceline were detected directly north of the digesters.

TABLE 4
Summary of Loveland WWTP Fenceline Sampling Results

Number	Location Description	H ₂ S (ppm)		Odor (D/T)	
		Average	Max	Average	Max
1	Fenceline at South Entrance to Headworks	0.123	0.620	4.1	15.0
2	Fenceline at manhole in driveway	0.263	1.500	4.2	30.0
3	Fenceline at rock in driveway	0.077	0.390	1.8	7.0
4	Fenceline at road sign	0.084	0.280	2.7	7.0
5	Main gate	0.039	0.280	3.3	30.0
6	1/2 way up hill from gate	0.039	0.300	1.3	4.0
7	NW corner of fenceline	0.034	0.160	1.9	7.0
8	Fenceline behind power pole	0.030	0.110	1.1	2.0
9	Fenceline past last tree (from W)	0.036	0/450	2.2	15.0
10	Fenceline 1/2 way b/w tree and sludge tanks	0.019	0.140	3.5	30.0
11	Fenceline behind sludge tanks	0.012	0.063	1.3	2.0
12	Fenceline b/w sludge tanks and digesters	0.014	0.130	1.9	15.0
13	Fenceline due East of digester (north of flare)	0.005	0.079	1.0	1.0
14	Canal at road	0.024	0.140	1.3	2.0
15	Canal at 1st break in trees	0.016	0.180	1.5	7.0
16	Canal just past trees	0.020	0.119	3.2	30.0
17	Canal due N of light at sludge tanks	0.016	0.120	1.1	2.0
18	Canal b/w sludge tanks & digesters	0.007	0.066	1.7	7.0
19	Canal at NE corner of plant	0.005	0.021	1.3	2.0
20	Fenceline behind digesters	0.016	0.150	4.7	30.0

Date sampled: October 7-23, 2003 and June 2, 2004

Baseline Model

The baseline odor modeling assessment used emission rates obtained from sampling performed during 2003 and 2004. Several sampling methods were used to obtain reliable and comprehensive odor data, including the EPA's flux chamber for area sources. The sample analyses included measurements of field H₂S, field ammonia, lab reduced sulfur compounds, and odor panel data. The sampling results indicate that the odor from the Loveland WWTP is caused by more than just H₂S. To account for the combined effect of all odorous compounds, odor was modeled instead of just H₂S, ammonia, or reduced sulfur compounds.

Technical Approach

The odor modeling approach is described in the following section, which provides detailed information about the procedures used in the odor modeling analysis.

Odor

Odor is measured in four different ways:

- **Intensity (strength)**
 - Measures odor intensity as a volumetric dilution ratio - final diluted volume at the odor threshold (V_f) to the initial sample volume (V_s) or D/T
- **Butanol Equivalence (Intensity)**
 - Measures odor intensity as an equivalent concentration of n-Butanol, volumetric parts per billion (ppbv)
- **Character** ("what does it smell like?")
- **Hedonic Tone** (degree of unpleasantness)

Odor strength quantifies the degree of odor perception of a whole air sample. Threshold is defined as the point where the odor is barely perceptible to the sampler. The number of dilutions of pure air required to barely perceive the odor then indicates the strength of the sample. The threshold is thus termed dilutions-to-threshold (D/T). Relatively speaking, the higher D/T number indicates the stronger the odor.

To measure odor, air samples are typically collected using a portable air pump and stored in inert sample bags. The sample bags are taken offsite and analyzed by odor specialists using an odor panel comprised of various people that smell the sample. When half the panel does not detect the odor, that is the D/T level reported. Table 5 describes various D/T levels and human reactions.

TABLE 5
D/T Ratio and Typical Human Reactions

D/T Ratio	Description	Reaction
0 Human Threshold ¹	The lowest concentration at which the average noses can detect the odor.	Human nose can sense the odor and determine a difference from normal background odors. The odor is not alarming at this level, just barely noticeable.
4	The odor is very slightly noticeable above background odors.	Human nose can sense the odor and determine a difference from normal background odors. The odor may cause slight discomfort to some humans, but typically it's not alarming or at nuisance levels.
7	The odor is very slightly noticeable above background odors.	Human nose may determine the source if the nose has previously experienced higher strengths of the particular odor compound. The odor may cause slight discomfort to some humans, but typically it's not alarming or at nuisance levels.
20	The odor is slightly noticeable above background levels.	The human nose may determine the source, regardless if it has been previously detected or not (may cause a slight nuisance odor reaction ² with some individuals). Typically odors lower than this ratio do not cause odor complaints.
50	The odor is noticeable above background levels.	The human nose can determine the source and may result in a nuisance odor reaction with some individuals.
100 (plus)	The odor is extremely noticeable above background levels.	The human nose can detect the source, and typically results in a nuisance odor reaction.

Notes:

1. Odor threshold concentrations for typical odor causing compounds are ("ppmv" = parts per million measured volumetrically):

H₂S = 0.0008 ppmv

Sulfur/mercaptan compounds = 0.001 ppmv

Ammonia = 2.4 ppmv

2. A nuisance odor reaction typically causes one or several of the following reactions: public complaint, extreme discomfort, sleeplessness, agitation, and/or a strong motivation to stop the odor impact.

As with most wastewater treatment plants, the Loveland WWTP modeling assessment used the odor intensity in the unit of D/T to measure the odor because it is a comprehensive parameter to quantify the odor impact resulting from all kinds of compounds. The odor thresholds used in this model analysis was 7 D/T, required by the State of Colorado regulation for predominantly commercial or residential land, as described earlier in this report.

Emission Sources

Odor emission sources must be defined in terms of their odor emission rates and physical characteristics to be modeled. Sources can be characterized as point, area, or volume sources. Point sources include exhaust air through a duct or vent at a known rate. The height of the release, outlet diameter, exit velocity, and exit gas temperature can be readily

defined. Area sources are open tanks or basins. Emissions are released from the liquid surface. Area sources are defined by their release height, width and length of surface area, and angle of rotation. Volume sources are releases that are not easily defined as point or area sources. The physical parameters, actual sampling data, and calculated emission rates for each plant odor source are summarized in Appendix G. The sources modeled are shown in Table 6.

TABLE 6
Summary of Loveland WWTP Odor Sources Included in the Modeling Effort

Area Sources	Point Sources	Volume Sources
Rectangular Area Sources: <ul style="list-style-type: none"> • Aerated Grit Chamber • Old Aeration Basin • New Aeration Basin • East Digester Junction Box • West Digester Junction Box • Screw Pump • Primary Effluent Wetwell • Trickling Filter Effluent Channel • Primary Splitter Box • Aerated Grit Effluent Channel • Influent Collection Well 	<ul style="list-style-type: none"> • Headworks Odor Control Exhaust • Flare 	<ul style="list-style-type: none"> • Grit/Screening Trucks Loading • Digester Boiler Room Vent* • DAFT Door • DAFT Window
Circular Area Sources: <ul style="list-style-type: none"> • East Trickling Filter • West Trickling Filter • East Primary Clarifier • West Primary Clarifier • Biosolids Truck Loading Hatch 1 • Biosolids Truck Loading Hatch 2 • Biosolids Truck Loading Hatch 3 • Anaerobic Digester Cover Ring • Final Clarifier 1 • Final Clarifier 2 		

* Digester boiler room vent does not have sufficient vertical momentum to be considered a point source. It tends to create mixing and turbulence around boiler box. Therefore, it is considered a volume source.

The site plan drawings (LL05c01.dlv and LL05c02.dlv) were used as the base map to locate the individual sources when setting up the modeling input files. These site plan reference drawings were developed in 2003 from the recent Step Feed, Ultraviolet (UV) Disinfection, and Secondary Electrical Improvements project. The Universal Transverse Mercator (UTM) coordinate system was used to orient each source.

Emission Calculations

For sources near the entrance to the plant (grit handling and primary clarifiers), H₂S measurements are strongly correlated to odor threshold levels. Odors from aeration basins and solids handling areas are more complex and are not accurately characterized by H₂S alone. Odorous compounds from these process areas include amines, reduced sulfur compounds, mercaptans, and fatty acids. These compounds have high odor intensities even without H₂S present. Therefore, the modeling was run based on the odor intensities (D/T)

emission, expressed as odor units per second (OU/s), which is the equivalent of D/T x m³/s. From the perspective of dispersion model, the odor unit is equivalent to the mass of any odor compound, like H₂S, in the unit of gram.

To obtain the appropriate odor emission data for the model input, the following steps were conducted:

1. Convert H₂S data obtained from sampling to odor threshold data (D/T) using H₂S -to-odor unit correlation developed as part of the Orange County Sewer District (OCSD) Odor Control Master Plan:

$$1 \text{ ppbv H}_2\text{S} = 2.3355 \text{ Odor units (D/T)}$$

2. For stack samples, the odor emission rate is determined by stack flow rate:

$$\text{OU/s} = (\text{D/T}) \times (\text{exhaust flow rate, ft}^3/\text{min}) \times (\text{m}^3/35.34 \text{ ft}^3) \times (\text{min}/60\text{s})$$

3. For non-aerated area sources, the sweep air flux through the flux chamber is 5 L./min. The surface area of the flux chamber is 0.13 m². Therefore, the odor flux is

$$\text{Odor flux (OU/min/m}^2\text{)} = (\text{D/T}) \times (5 \text{ Lpm}/1000) / (0.13 \text{ m}^2)$$

And the odor emission is:

$$\text{Odor Emission (OU/s)} = (\text{Odor Flux, OU/min/m}^2\text{)} \times (\text{surface area, ft}^2\text{)} / (10.76 \text{ ft}^2/\text{m}^2) / (60 \text{ s/min})$$

4. For the aerated area sources, the odor emissions from these processes is:

$$\text{OU/s} = (\text{D/T}) \times (\text{aeration air, ft}^3/\text{min}) / (35.34 \text{ ft}^3/\text{m}^3) / (60\text{s/min})$$

The emissions calculated from sampling results are presented in Appendix G.

Model Selection

Dispersion modeling is a mathematical method that relates emissions from a source to ambient air concentrations located downwind. The dispersion model selected for this analysis was the Industrial Source Complex – Short Term Version 3 (ISCST3). The model is recommended by EPA for use in demonstrating compliance with ambient air quality standards. It is designed to assess the combined impacts from multiple sources and source types in simple and intermediate terrain.

Two other models can be used for odor dispersion modeling, AERMOD and CALPUFF. AERMOD is also a Gaussian plume model. The dispersion coefficients are based on boundary layer theory rather than empirically derived from sampling data. AERMOD uses a continuous turbulence spectrum whereas ISCST3 uses discrete stability categories. Validation of the model has been done with data sets with sampling data averaged over a one-hour time period. Although proposed by EPA as a replacement for ISCST3, it has not been used for odor impact assessments.

The CALPUFF model is a Lagrangian puff model. It is approved by EPA for use in long-range transport studies. The model can be used for short transport times. The meteorological data needed to run the model can be a single meteorological station (as

would be the case for ISCST3) or developed from several stations (as would be required for long range transport studies). Use of the CALPUFF model for odor studies has been limited due to the large amount of input data required and the little, if any, benefit over ISCST3. For the Loveland WWTP, the ISCST3 output was adjusted using the power law to represent puff conditions, which is the same method by which CALPUFF simulates puff conditions.

A comparison of the ISCST3, AERMOD and CALPUFF models was conducted by Diosey¹. This comparison showed that maximum predicted impact from a typical wastewater treatment plant was similar for ISCST3 and CALPUFF run in the refined mode. Predicted impacts for AERMOD were a factor of 24 lower than ISCST3 and a factor of two lower for CALPUFF run in the screening model. Therefore, ISCST3 results are the most conservative of the odor dispersion models used in the air quality industry. The other two models were not used for the Loveland WWTP because CALPUFF is very complicated with much longer run times resulting in little benefit and AERMOD is not as conservative as ISCST3.

Model Inputs

The ISCST3 model has several required inputs. The control options (CO) define how the model is to be executed. Many of these control options are default values or options EPA requires for regulatory compliance. The source options (SO) define the physical source parameters and emission rates. As discussed above, different types of sources (point, area and volume) have different physical characteristics. Large buildings close to the stacks or other point sources can radically influence the dispersion pattern, which is known as building downwash. There is an algorithm developed in ISCST3 to estimate the impact of the building on the dispersion of the plume, which is included in this section. The receptor grid (RE) array needs to be defined or the receptor coordinates can be input to define the discrete receptors of interest. Receptors are the off-site locations downwind where ambient concentrations are predicted. The meteorological (ME) data and terrain data to be used in the modeling analysis are defined next. The output (OU) options define how the resulting concentrations are to be summarized and presented in the output file.

The shortest averaging period that can be selected to present the modeling results is one hour because the meteorological data contains only one value for each hourly period. One-hour averaging tends to reduce peak values. Impacts over the 1-hour period tend to round out any puff conditions. From experience, puffs of odor in as little as 3-minute durations can cause odor complaints. Therefore, a power law correction is used to allow an assessment of puff conditions that may occur. The irregular isopleths are due to the variable nature of the wind direction, wind speed, and stability categories. The power law affects only the magnitude of the predicted impact.

As a conservative assumption, the model output is interpreted as a 1-hour average concentration. To make comparisons to odor thresholds with shorter averaging periods (such as five minutes), the following relationship is used:

¹ Diosey, Phyllis G., Maureen E. Hess, and Lorraine Farrell, *Evaluation of Alternative Dispersion Models for Use in Odor Management*, WEFTEC 2002 75th Annual Technical Exhibition and Conference, Conference Proceedings, WEF, Alexandria, VA

$$C_1 = C_0 * (t_0 / t_1)^p$$

Where: C_0 = initial (1-hour) concentration with an averaging time, t_0 (60 minutes)

C_1 = desired concentration with an averaging time, t_1 (5 minutes)

p = power law factor of 1/5

The 1/5 power law factor has been demonstrated as the peak-to-mean scaling factor during field and wind tunnel studies performed at wastewater treatment plants and low level releases (Porter et al., 1994). Applying a peak-to-mean scaling factor provides a conservative estimate of short-term puff impacts when demonstrating compliance with ambient odor thresholds. For this odor study, the model runs completed for each of the five years (1999 to 2003) produce the 1-hour maximum concentration based on a 1-hour (or 60-minute) average. To obtain the 5-minute average concentration, the 60-minute concentration is multiplied by 1.64 ($(t_0/t_1)^p = (60/5)^{1/5} = 1.64$). The probability of odor complaints depends on odor intensity and number of hours that the odors exceed the determined acceptable threshold. By measuring surface and upper air in short averaging periods, the magnitude and duration of peak intensities is better quantified.

Meteorological Data

Two types of meteorological data are used to characterize the dispersion environment – surface meteorological data and mixing height data. The surface meteorological data used in this modeling assessment were measured from the Fort Collins-Loveland Airport, which is the closest airport to the Loveland WWTP. The surface data defines the wind speed, wind direction, temperature, and cloud cover used in this analysis. The mixing height data had to be derived from upper air measurements collected at the Stapleton International Airport site, which was the closest location that had all the necessary mixing height data. Mixing height data defines the depth of the surface layer that a plume will disperse. Both surface and upper air data for the 5-year period from year 1999 to year 2003 were used in the screening level model analysis. Then, the year that resulted in the highest off-site impacts (2003) was used in all the modeling described below. The data was purchased through the National Climatic Data Center in Asheville, North Carolina. The ISC-ready meteorological data files were prepared using the PCRAMMET preprocessor program in accordance with EPA procedures.

Terrain Data

Typically, the terrain files used in the dispersion modeling analysis are obtained from the U.S. Geological Survey (USGS) 7.5-minute Digital Elevation Model (DEM) data sets. These terrain files normally contain 30-meter intervals. Based on the terrain data, the dispersion modeling program can calculate the elevations at receptors and odor sources. In this modeling analysis, plant-specific terrain information was used because it has the smaller intervals (10 meters) and is more accurate and up-to-date for the plant location. The terrain elevations were obtained from the topographical information provided by the City using the GIS program for all the defined receptors and odor sources, which were then input back to the dispersion model.

Model Runs

The baseline odor condition at the Loveland WWTP included all the treatment processes units typically on-line in the summer. ISCST3 predicts 1-hour average pollutant concentrations. However, odor nuisances are most often associated with puff conditions, or exposure times on the order of seconds or minutes rather than hours. Averaging over an hour has the effect of smoothing out the concentration peaks. Therefore, the 1-hour concentrations predicted by ISCST3 were converted to peak 5-minute concentrations (using the power law). This reduces the number of data points analyzed by the model from one a minute to one every five minutes. Typically, the shorter the averaging period means the more conservative the values because fewer data points are averaged. The peak 5-minute concentrations are greater than the 1-hour average concentration and better represent puff conditions. The peak 5-minute concentrations of all the model runs were compared to a fenceline threshold of 7 D/T.

A baseline model was created from both sampling events. A review of the emissions in Appendix G shows that the odor emissions obtained from the H₂S data from the Jerome meter sampling are generally higher than those obtained from the flux chamber sampling. The difference may be caused by the following reasons:

- Seasonal differences between the sampling events. The Loveland WWTP typically experiences more odor complaints in the late fall.
- The Jerome sampling results used in the emission calculations were the highest odor that occurred at each process during all 30 sampling times, over a period of 21 days. In reality, not all the highest odor events at each process will occur at the same time. Therefore, this is considered a worst-case condition. The flux chamber sampling was performed on a single day, which may not have captured the worst odor event during the summer. Therefore, it is considered as an average or one-day condition.
- The conversion relationship between odor (D/T) and H₂S used is specific to the Orange County Sanitation District (OCSD) wastewater treatment plant and may overestimate the odor concentrations at other plants. OCSD completed an extremely thorough odor control study in 2001. The data generated provided a good correlation for converting H₂S emissions to D/T that is widely used. A similar correlation factor could not be estimated for Loveland WWTP because the odor concentrations were insensitive to H₂S concentrations reported during the flux chamber sampling. The odor concentrations were not correlated to H₂S concentration.

Two baseline models were performed and compared.

- **Worst Case Baseline:** Model input based on Jerome meter sampling data
- **One-Day Baseline:** Model input based on flux chamber sampling data

Results of Baseline Odor Modeling

Odor impacts can lead to complaints when the off-site concentrations are significantly above the odor threshold or occur at or near odor threshold levels with regular frequency. Odor modeling data were analyzed from five aspects:

- Duration of odor above the threshold at off-site receptors
- Maximum source contribution to off-site impacts and extent of the impacts
- Off-site D/T distribution at certain receptors
- Off-site impact distribution by time of day at certain receptors
- Meteorological conditions when the maximum impact occurred at certain receptors

Duration of Odor Above Threshold

Figures 1 and 2 show the number of hours when odor levels are above the odor threshold at each receptor for the Worst-Case and One-Day sampling, respectively. The area inside the circle, or isopleth, is the area impacted at the number of hours shown.

Worst-Case Baseline (Jerome Meter Sampling)

In the worst-case baseline (based on the Jerome meter sampling), the odor impact from all the existing sources at Loveland WWTP based on a 5-minute averaging period with an odor standard of 7 D/T is shown in Figure 1. There is a significant off-site area that can perceive the 7 D/T or higher odor levels greater than one percent of the time. The residential area northwest of the plant could potentially perceive the odor that is higher than 7 D/T up to 500 hours a year. The residential area further north of the plant could be impacted up to 50 or 100 hours per year. The isopleths are centered at the north end of the plant, which means the highest odor impact occurs at that area. This could be explained by the observed prevalent wind direction that will bring the odor from those big odor sources, such as the headworks, aerated grit chamber, and other sources, to north and northeast areas.

Figure 3 shows the receptors where the highest maximum 5-minute D/T occurred at the plant (Receptor A) and where the highest exceedence occurred at the plant (Receptor B).

One-Day Baseline (Flux Chamber Sampling)

A similar isopleth was created for the one-day baseline (flux chamber sampling) modeling results, shown in Figure 2. This Baseline represents a typical day without much noticeable odors in the community surrounding the Loveland WWTP. It shows a much smaller impact area focused on the north end of the plant. The highest odor impacts are more likely due to two areas - aeration basins/grit chamber area and digester/boiler room area.

Maximum Source Contribution to Off-Site Impacts and Extent of the Impacts

The highest off-site odor impacts from both baseline models were tabulated by source groups to assess their contribution to off-site impacts. Table 7 presents the maximum 5-minute odor impacts and maximum annual average odor impacts expressed as D/T for each major process area (source group). The ratio of the maximum annual odor to the maximum 5-minute odor, peak-to-mean ratio, is a parameter indicating the frequency of the

maximum odor occurrence, and is also shown in the table. Note that the maximum source group impacts are not additive because they occur at different times and locations.

For the worst-case baseline, the maximum combined 5-minute odor impact from all the sources was 1,128 D/T, which is significantly higher than the odor threshold of 7 D/T. The maximum combined 5-minute odor impact from the digester boiler room vent was 1,000 D/T. The digester boiler room vent is the most significant contributor to the off-site odor impact in terms of strongest odors. The next source having the highest maximum 5-minute odor impact is the aerated grit chamber. It generated 857 D/T of maximum 5-minute odor impact. The DAFT is the next source having the maximum odor impact of 233 D/T, followed by the trickling filters. The remainder of the sources that had maximum 5-minute odor impact higher than 7 D/T include screw pumps, primary clarifiers, flare, headworks building door, and aeration basins. The ratio of maximum 5-minute odor to the maximum annual odor at the digester boiler room vent was only 56, suggesting the mean impact from this source is almost as significant as the peak impact. While the peak-to-mean ratio for the aerated grit basin was 242, suggesting that that odor source is less chronic and more acute in nature.

For the One-Day baseline modeling, the maximum combined 5-minute odor impact from all sources was 136 D/T, about one eighth of the impact of the Worst-Case baseline. The aeration basins are shown as the biggest contributor to the off-site odor impact for the maximum 5-minute odor, while the digester boiler room vent is still the biggest contributor on an average annual basis.

The prioritization of the odor sources was based on the maximum 5-minute odor strength (D/T) and the peak-to-mean ratio analysis from the Worst-Case baseline model. Figure 4 summarizes the ranking of the major odor sources at the plant. The remainder of the analyses conducted are focused on the Worst-Case baseline since those odor impacts are more consistent with the odor complaints from the surrounding community.

Off-Site D/T Distribution at Certain Receptors

A more detailed analysis of odor impacts was performed at Receptors A and B (see Figure 3) for the worst case baseline. Receptor A is the location where the highest maximum 5-minute D/T occurred based on the 2003 modeling. Receptor B is the location where the maximum exceedence occurred based on the 2003 modeling.

Figure 14 shows that 26 percent of the time (2,278 hours) the odor impact from all the sources at Receptor A was above 7 D/T. Within this time, 11 percent of the time the odor impact was above 100 D/T (964 hours) and 11 percent (964 hours) when the odor was between 20 D/T and 100 D/T. During the remainder of the time (4 percent, 350 hours), the odor was between 7 D/T and 20 D/T. Approximately 74 percent of the time during a year, Receptor A received an odor impact less than 7 D/T.

The odor exceeded 7 D/T for about 2,366 hours per year (27 percent of the time) at Receptor B. Among this time, only one percent of the time the odor impact was above 100 D/T (88 hours), and eight percent (701 hours) when the odor was between 20 D/T and 100 D/T. During the remainder of the time (18 percent, 1,577 hours), the odor impact was between 7 D/T and 20 D/T.

TABLE 7

Maximum 5-Minute and Annual Average Odor Impacts from Existing Sources at Fenceline Receptors

Source Group	Worst-Case Baseline (Jerome Meter Data)			One-Day Baseline (Flux Chamber Data)		
	Max 5-min D/T	Avg Annual D/T	Peak-to-Mean (5-min D/T)/ (Annual D/T)	Max 5 min D/T	Avg Annual D/T	Peak-to-Mean (5-min D/T)/ (Annual D/T)
All Source	1128	20.3	55	136	2.2	61
Digester boiler room vent	1000	18.0	56	67	1.2	56
Aerated Grit Basin	857	3.5	242	71	0.3	238
DAFT	233	0.8	293	50	0.2	293
Trickling Filter	174	1.3	132	70	0.5	133
Screw Pumps	163	1.5	107	18	0.2	107
Primary Clarifier	146	0.7	197	49	0.3	159
Flare	79	0.6	134	3	0.0	135
Headworks Door	30	0.5	63	3	0.0	63
Aeration Basins	28	0.4	69	81	1.0	81
Headworks Building Exhaust	5	0.07	70	1	0.0	69
Digesters	1	0.0	98			
Biosolids Loading	0	0.0				

Notes:

Predictions based on 2003 surface meteorological data from Fort Collins-Loveland Airport.

Model output was converted to 5-minute average concentrations using a factor of 1.64.

Off-Site Impact Distribution by Time of Day at Certain Receptors

The distribution of off-site impacts by time of day over a year at Receptors A and B are shown in Figure 15. Each slice of the pie chart represents the percentage of the exceedences over 7 D/T that occurred during a 4-hour interval of a day in 2003. At Receptor A, approximately 75 percent of the exceedences over 7 D/T occurred between 9 PM and 8 AM, during which time most people are in the hours sleeping. Among these nighttime exceedences, 21 percent occurred during 9 PM to 12 AM; 26 percent occurred during 1 AM to 4 AM; and 28 percent during 5 PM to 8 PM, respectively. At Receptor B, approximately 67 percent of the exceedences over 7 D/T occurred between 9 PM and 8 AM. In summary, more odor intensities above 7 D/T occurred in the evening and night between 9 PM and 8 AM at Receptor A, and more noticeable odor events occurred between 9 AM to 8 PM at Receptor B.

Meteorological Conditions when the Maximum Impact Occurred at Certain Receptors

Odor impacts, to a large extent, depend on meteorological conditions such as wind direction and wind speed. The meteorological conditions at the specific times in 2003 when the maximum impacts were predicted to occur at Receptors A and B are identified in Table 8. There are a lot of similarities between the meteorological conditions at these two receptors when the maximum impact (maximum D/T) occurred. The maximum impacts at these two receptors both occurred in winter late night, when the temperature was very low. The wind speeds were both 1.03 meters per second. In addition, both occurrences occurred during stability class F, which is the most stable and tends to have the least turbulence and mixing causing the odors to be higher closer to the fence line. At receptor A, the wind blew from the southwest to northeast when the maximum impacts occurred. At receptor B, the wind blew from the southeast to the northwest when the maximum impacts occurred. This is consistent with the relative location of the receptors and the plant processes since the wind carried the odor emitted from the majority of wastewater treatment processes to the receptors.

TABLE 8
 Meteorological Conditions When The Maximum Impact Occurred

Receptor	Date	Hour	Temperature (°F)	Wind Speed (m/s)	Wind Direction	Stability Class
A	01/16/2003	2 AM	18	1.03	From southwest	F
B	11/13/2003	10 PM	34	1.03	From southeast	F

Odor Control Modeling

Technical Approach

Four odor control scenarios were modeled in this analysis to investigate the effect of positively controlling the odor sources. The odor control improvements either eliminate the identified big odor sources completely, such as the trickling filters, or convert the major odor sources into the odor control scrubbers that emit significantly less odor, such as the chemical scrubber treating the headworks and grit chambers at Stage 3. The major sources controlled were selected based on the prioritization in baseline modeling. The four odor control scenarios modeled are:

Stage 1 – Discontinue the operation of the trickling filter as a result of the aeration basin improvement project.

The construction project that is currently being done at the plant includes converting the existing aeration basin to a step-feed process, and adding more aeration basin volume. After these process changes have been completed, the secondary treatment capacity will be sufficient to treat the plant flow without the use of the trickling filter. Since the trickling filters are the fourth biggest odor source based on the baseline modeling results, elimination of trickling filters will reduce the off-site odor impact from the plant.

Stage 2 – In addition to Stage 1, relocate the digester boiler room HVAC intake vent to reduce the odor emission from the digester boiler room vent.

The current sampling results show the maximum H₂S concentration measured at the digester boiler room vent is 17 parts per million (ppm), which is comparable to the H₂S concentration in the digester gas. The normal H₂S concentration from the similar building (such as solids building) HVAC vent is between 0.003 ppm and 0.08 ppm. The high H₂S concentration from Loveland WWTP boiler room is due to the HVAC intake location directly between the digester overflow weirs. The HVAC system is pulling in fugitive odor emissions from the digesters and overflow weirs, circulating through the HVAC system, and blowing the odors directly towards the residential areas with a flowrate of 2,700 cubic feet per minute (cfm). Relocating the HVAC intake vents could bring the H₂S level down to the typical HVAC vent H₂S level. Therefore, in this modeling analysis, it is assumed that the digester boiler room vent emits 0.05 ppm of H₂S after the HVAC intake is relocated. The ventilation air flow in this room is 2,700 cfm. Therefore the odor emission from the vent is reduced to 150 OU/s.

Stage 3 – In addition to Stage 2, the aeration grit chamber would be covered with a new carbon odor control unit installed to treat the air from grit chamber.

The major assumptions made in Stage 3 modeling include:

1. The ventilation airflow from the aerated grit chamber is selected based on 6 air change per hour (ACH) in the air space of the grit chamber. This would required an

airflow of approximately 250 cfm, which is an increase from the current aeration air of 100 cfm.

2. The new carbon unit has 95 percent odor removal efficiency.
3. The carbon unit discharge stack diameter is about 4 inches to allow an appropriate exit velocity (approximately 3,000 fpm).

Stage 4 – In addition to Stage 3, provide odor control for the entire headworks building as part of the new or modified headworks facility currently listed in the City's CIP for the Loveland WWTP. Headworks replacement would include replacing the screw pumps, aerated grit basins, and screening processes with new processes, all contained within a building. In addition, the influent collection well would also be contained for odor control purposes. The air from this facility would be treated in a new chemical scrubber followed by a bioscrubber or carbon scrubber at the same location as the carbon unit modeled in Stage 2, to the east of the existing headworks building. Stage 4 would provide odor control for a new headworks building or a modification of the existing headworks building.

The major assumptions made in Stage 4 modeling include:

1. Ventilate the entire headworks building at 12 ACH, so the air flow is approximately 13,000 cfm.
2. The new chemical scrubber followed by a bioscrubber or carbon scrubber has 99 percent odor removal efficiency.
3. The chemical scrubber discharge stack diameter is about 2.5 feet to allow an appropriate exit velocity (approximately 3,000 fpm).

Stage 5 – In addition to Stage 4, provide odor control for the DAFT by installing a new carbon unit nearby.

1. The ventilation airflow from the DAFT is based on 12 ACH in the DAFT dome. This would required an airflow of approximately 800 cfm, which is higher than the current ventilation airflow of 700 cfm.
2. The new carbon unit has 95 percent odor removal efficiency.
3. The carbon unit discharge stack diameter is about 8 inches to allow an appropriate exit velocity (approximately 3,000 fpm).

Stage 6 - In addition to Stage 5, cover the primary clarifiers and provide the odor control by installing an dedicated odor control chemical scrubber.

1. Ventilate the headspace of the two primary clarifiers and the effluent well at 6 ACH. Assuming 4 feet of free board, the ventilation air would be approximately 3,800 cfm for two 78-foot diameter primary clarifiers and 200 cfm for the effluent wet well.
2. The new chemical scrubber would have 95 percent odor removal efficiency.
3. The chemical scrubber discharge stack diameter is about 16 inches to allow an appropriate exit velocity (approximately 3,000 fpm).

Stage 7 – In addition to Stage 6, cover the aeration basins and provide the odor control by installing an dedicated odor control chemical scrubber for the aeration basins. In addition, install fixed covers for each digester with a gas collection system so that there are no odor emissions from the digester cover perimeters.

1. Ventilate the headspace of the two aeration basins at 6 ACH. Assuming 4 feet of free board, the ventilation air is about 8,600 cfm, which is slightly higher than the aeration air. The odor control chemical scrubber is sized based on 8,600 cfm.
2. The new chemical scrubber has 95 percent odor removal efficiency.
3. The carbon unit discharge stack diameter is about 22 inches to allow an appropriate exit velocity (approximately 3,000 fpm).

The conditions represented in these seven odor control scenarios are shown in Table 9. The check marks indicate which proposed odor control improvements (shown in rows) were modeled in each control scenario (shown in columns). The odor control modeling was performed using the same protocols as Baseline modeling, such as the emission sources, the emission rates, the model selection, and the meteorological data. The odor threshold of 7 D/T was modeled. Equipment cut sheets for each recommended type of odor control are included in Appendix H.

TABLE 9
Conditions Represented in the Odor Control Modeling

Odor Control Project	Description	Stage 1	Stage 2	Stage 3	Stage 4	Stage 5	Stage 6	Stage 7
Trickling Filters	Discontinue the use of trickling filters.	✓	✓	✓	✓	✓	✓	✓
Digester Boiler Room Vent	Eliminate the fugitive odors being collected in the HVAC exhaust		✓	✓	✓	✓	✓	✓
Aerated Grit Chamber	Cover aerated grit chamber and install a new carbon unit to treat the air from grit chamber (95% odor removal)			✓	✓	✓	✓	✓
Headworks Building	Ventilate new or modified Headworks building at 12 ACH. Provide a new chemical scrubber to treat the air from both the aerated grit chamber and the headworks building (99% odor removal). Replace screw pumps or cover and ventilate to the odor control scrubber.				✓	✓	✓	✓
DAFT	Maintain negative pressure inside DAFT by providing 12 ACH ventilation. Add a new carbon unit to treat the air from DAFT (95% odor removal)					✓	✓	✓
Primary Clarifiers	Cover and vent primary clarifiers to odor control scrubber (95% removal efficiency)						✓	✓
Aeration Basins and Digesters	Cover and vent aeration basins to odor control scrubber (95% removal efficiency). Provide odor control for digesters with fixed roof tanks.							✓

Results of Odor Modeling with Control Scenarios

Duration of Odor Above Threshold

The results of the odor control modeling are shown in Figures 16 through 22, as described below, by showing the number of hours when odor levels are above the odor threshold for each control scenario. These exceedences are not actual exceedences, but worst-case predictions based on the modeling analysis conducted.

The odor exceedences above 7 D/T from all the plant processes under Stage 1 is shown in Figure 16. Compared with the current condition (Baseline, Figure 1), the isopleths under Stage 1 showed the similar shape, but slightly reduced exceedences.

Under odor control stage 2 (Figure 17), the odor impact was reduced significantly compared with the baseline. The exceedence above 7 D/T at the WWTP's north end was reduced from

approximately 1,500 hours per year at Baseline to approximately 1,000 hours per year with Stage 2. The location where the highest exceedence occurred within the plant moved from the east boundary of the plant to the west boundary of the plant, and the highest exceedence was reduced from approximately 2,428 hours per year at Baseline to approximately 1,700 hours per year for Stage 2.

The odor impact of the plant processes with the odor threshold of 7 D/T during Stage 3 and Stage 4 are shown in Figure 18 and Figure 19. By controlling the odor emission from the aerated grit chamber and the Headworks, the odor impact was reduced further. The location where the highest exceedence occurred within the plant was on the west plant boundary. It was reduced to 1,400 hours per year under Stage 3 and 970 hours per year under Stage 4. Figures 20 and 21 show the overall impact of the plant during Stage 5 and Stage 6, respectively. Odor control the DAFWT under Stage 5 had the significant improvement on the off-site odor impact. The 50-hour –per year isopleth was reduced to a fairly small area around the northern end of the plant. The highest exceedence on the plant boundary was about 700 hours per year. Covering and odor controlling the primary clarifiers under Stage 6 further reduced the off-site odor impact. Only at a limited area at the northwestern corner of the plant can people perceive the odor stronger than 7 D/T (less than 50 hours per year).

Controlling the odor emissions from the aeration basin and digesters under Stage 7 (Figure 22) reduced the off-site odor to an almost non-detectable level at most of the areas. The rare odor impact that is above 7 D/T only occurred at the northwestern corner of the plant.

Although, these seven odor control stages will meet the odor control goal of odors less than 7 D/T 99 percent of the year, it is not required to implement all seven stages to meet the plant's odor control goals. CH2M HILL recommends that the City plan to incorporate Stages 1 through 5 in their current CIP. It is anticipated that this level of odor control will meet the proposed odor control standard, given the conservative nature of the analysis. At each stage, the City should conduct additional sampling and monitoring to see if more improvements are required.

Maximum Source Contribution

The maximum off-site odor impacts are summarized by process unit from the results of odor control modeling as well as the baseline modeling. Table 10 lists the maximum 5-minute odor impacts and annual average odor impacts, expressed as D/T, for the major odor sources controlled and the new odor sources –chemical scrubbers and carbon units.

TABLE 10
Maximum 5-Minute and Annual Average Odor Impact (D/T) from the Entire Plant for Odor Control Scenarios

Model	All		Digester Boiler Room Vent		Grit Chamber Odor Control		Headworks Odor Control		DAFT Odor Control		Primary Clarifiers Odor Control		Aeration Basins Odor Control	
	Max. 5-min D/T	Max. Ann. Ave. D/T	Max. 5-min D/T	Max. Ann. Ave. D/T	Max. 5-min D/T	Max. Ann. Ave. D/T	Max. 5-min D/T	Max. Ann. Ave. D/T	Max. 5-min D/T	Max. Ann. Ave. D/T	Max. 5-min D/T	Max. Ann. Ave. D/T	Max. 5-min D/T	Max. Ann. Ave. D/T
Baseline	1,128	20.6	1,000	18.0										
Stage 1	1,110	19.5	1,000	18.0										
Stage 2	873	6.7	2.9	0.1	2	0.03								
Stage 3	347	3.2	2.9	0.1										
Stage 4	298	1.7	2.9	0.1			3.6	0.02						
Stage 5	154	1.06	2.9	0.1			3.6	0.02	2.5	0.023				
Stage 6	80	0.86	2.9	0.1			3.6	0.02	2.5	0.023	0.5	0.0088		
Stage 7	80	0.65	2.9	0.1			3.6	0.02	2.5	0.023	0.5	0.0088	0.1	0.0014

Liquid Phase Treatment

Although domestic wastewater odors are caused by a variety of organic and inorganic compounds, H_2S is normally the predominant odor-causing compound found in collection systems and at the front end of WWTPs. Liquid phase odor control strategies reduce odors by reducing the hydrogen sulfide concentration in the liquid waste stream to reduce the amount of H_2S released to the atmosphere. There are several liquid phase strategies and chemicals that are used to counter hydrogen sulfide odors. CH2M HILL completed an analysis of collection system, liquid phase treatment alternatives as part of this Odor Management Plan.

The City's wastewater collection system consists of a network of large interceptor sewers (gravity), as well as several lift stations and corresponding forcemains. The location of the major lift stations and interceptors is shown in Figure 23. Wastewater enters the treatment facility primarily by gravity, with one forcemain coming from the Southside lift station directly to the influent collection well. The four main gravity interceptors all have lift stations further upstream that are contributing to elevated sulfide levels in the wastewater. The significant lift stations are South Horseshoe, East Side (or Jellystone), South Side, and Boyd Lake. Hydrogen sulfide concentrations detected in the headworks area of the Loveland WWTP are generally higher than typically found in similar WWTP and have led to odor complaints within both the collection area and the treatment plant vicinity.

Technical Approach

To help determine the cause of the elevated H_2S levels, samples of the influent wastewater were collected in conjunction with the odor sampling effort. In addition, some limited modeling of sulfide production and atmospheric H_2S levels in the conveyance system was performed. This modeling provided rough estimates of the anticipated, worst-case dissolved sulfide and H_2S emissions from each interceptor flowing into the WWTP. The model also predicted the wastewater detention times in each interceptor. The estimated concentrations from the modeling formed the basis of the comparison of liquid phase odor control alternatives.

Sampling

In conjunction with the odor sampling, the City measured the dissolved sulfide levels of the influent wastewater and interceptors to identify potential correlation between influent wastewater concentration and odor emissions. The results of the dissolved sulfide sampling that occurred are shown in Table 11. The locations of the sampling, along with the laboratory analyses are included as Appendix I. These results represent a snapshot of conditions during the sampling period and do not necessarily show the worst-case condition. Rather, the data proves the presence of significant levels of sulfide in the collection system wastewater and points to one potential cause of odors at the plant.

TABLE 11
Summary of Dissolved Sulfide Sampling (Grab Samples)

Sample Description	Sample Date								Average
	10/7/03	10/8/03	10/11/03	10/13/03	10/15/03	10/17/03	10/20/03	10/22/03	
WWTP – Boyd	3.8	2.2	2.4	1.5	1.9	0.7	2.0	1.8	2.0
WWTP – SS	3.8	3.2	3.1	-	10.1	26	14	-	10.0
WWTP – SE 8 th	2.0	4.6	3.3	1.3	1.3	0.9	11.0	0.9	3.2
WWTP – NAM	4.2	2.6	3.5	1.1	1.1	0.9	0.2	0.6	1.8
WWTP – Inf	1.8	5.8	2.7	1.1	0.7	0.7	0.3	1.0	1.8
Jellystone – Out	-	3.8	2.7	-	-	-	-	1.4	2.6
Jellystone – In/E	-	-	-	-	-	-	-	2.7	2.7
Jellystone – In/W	-	-	-	-	-	-	-	1.7	1.7
Jellystone – In/S	-	-	-	-	-	-	-	1.7	1.7
M Cove – In	3.5	3.8	-	1.7	-	-	-	-	3.0
M Cove – Out	-	2.6	-	2.3	-	-	-	-	2.5
Denver & 34	2.8	-	-	-	-	-	-	-	2.8

The sampling results indicate that sulfide generation within the collection system contributes significantly to the elevated H₂S levels at the WWTP. As part of this investigation, additional H₂S sampling was conducted with an OdaLog, an H₂S sampling device that continuously monitors H₂S concentrations. The OdaLog was installed downstream of the Auger monster, halfway down the channel sidewall in the Headworks Building. The results are shown on Figure 24. During the week of installation, the average H₂S concentration in the Headworks building was 22 ppm, with peaks greater than 100 ppm.

The wastewater interceptor sampling results indicate that the highest levels of dissolved sulfide comes from the Southside Interceptor. In addition, the frequency of the high peaks shown in the Odalog results correlates to the frequency of the Southside Lift Station cycles. However, the Southside Lift Station interceptor only represents two percent of the overall flow. The peaks are contributing to spikes seen at the WWTP, but the overall mass loading of sulfide is generated by other interceptors.

Modeling

CH2MHILL has developed a spreadsheet model (FMSULFIDE) to estimate sulfide concentration in force mains. It is based on an algorithm published by Boon², but incorporates in-house, proprietary algorithms that allow for situations where dissolved

² Boon, Arthur, "Septicity in Sewers: Causes, Consequences and Containment", Water Science and Technology, Vol. 31, No. 7, pp 237-253, 1995

oxygen (DO) is not initially equal to zero. Under this type of situation, the time required to deplete DO is calculated and subtracted from the total residence time providing the actual reaction time available for sulfide production.

The FMSULFIDE model has been developed to facilitate sensitivity analyses through varying flow, biochemical oxygen demand (BOD₅) or temperature data. This allows quick determinations to be made regarding sensitivity of the results to the selected input parameter values, and also helps identify any required data acquisition (e.g., field sampling). In addition, the model calculates the sulfide mass produced on a daily basis (pounds per day [lbs/day]).

A different algorithm was used to follow the fate of the sulfide in gravity sewers. This algorithm was developed by Pomeroy and Parkhurst³. The algorithm applies only to pipes flowing less than full and in which little or no DO exists. The equation accounts for sulfide generation by the slime layer, losses of sulfide due to oxidation in the stream, and sulfide emissions to the sewer atmosphere.

Both the force main and gravity sewer algorithms are combined in a model developed by CH2M HILL called the Interceptor Model. The Interceptor Model was used to estimate wastewater liquid-phase sulfide and vapor-phase hydrogen sulfide loading under various conditions and to analyze potential odor control strategies. The Interceptor Model is a predictive, not absolute, tool to determine sulfide loading in the collection system. The model predicts hydrogen sulfide dynamics in wastewater gravity and force main collection and transmission systems. The model accounts for sulfide generation, oxidation, mass transfer across the air/water interface, and liquid-phase bulk transport. Given the flow and wastewater characteristics at the upstream end of the interceptor and each collector or lateral intersection, the Interceptor Model calculates liquid and vapor-phase sulfide concentrations and vapor flow rate due to the liquid drag at downstream locations.

To develop a basis for the comparison of chemical alternatives to treat the wastewater coming to the Loveland WWTP, the main interceptors coming into the WWTP were modeled using the Interceptor Model to determine potential for H₂S generation for each interceptor. The interceptors were then prioritized as potential candidates for liquid phase treatment. The system modeled included approximately 41,400 feet of varying diameter pipe that typically handles a peak flow of 10.6 million gallons per day (mgd): 39,400 ft of gravity sewer ranges from 24-inches to 33-inches and 2,000 feet of forcemain (20-inches).

In addition to the sampling data, average annual data for the influent to the WWTP were collected and used in this analysis. A summary of the actual data used in the Interceptor Model is included in Appendix J. The following assumptions were used in the analysis:

- Chemical addition would occur only in the dry season of June through October.
- Wastewater temperature = 20.3 ° C
- BOD₅ = 275 mg/L
- Target dissolved sulfide concentration = 0.5 mg/L

³ : Design Manual "Odor and Corrosion Control in Sanitary Sewerage Systems and Treatment Plants EPA/625/1-85/018, pp 20-24, October 1985

Table 12 contains a summary of uncontrolled peak sulfide concentrations predicted by the model for each interceptor. The Boyd Interceptor and Boyd Relief Interceptor have the highest potential for H₂S generation, due to the high concentrations of dissolved sulfide and the significant amount of flow (40 percent of total influent) from these interceptors. While the Southside Lift Station had the highest dissolved sulfide concentration in the sampling, its contribution to the total flow is relatively insignificant. Liquid phase treatment would not be as effective at that lift station for reducing overall sulfide, but could help reduce some of the spikes observed.

TABLE 12
Summary of Interceptor Model Results

Interceptor (listed in order of priority)	Dissolved Sulfide in (mg/L)	Dissolved Sulfide out (mg/L)	H ₂ S out (g/m ³)	H ₂ S out (ppmV)	Type
Boyd Interceptor	7.1	7.5	0.79	561	Gravity
Boyd Relief Interceptor	3.1	4.7	0.471	333	Gravity
Southeast 8th Interceptor	4.1	4.5	0.46	322	Gravity
Namaqua Interceptor	4	4.2	0.408	288	Gravity
Southside Liftstation Interceptor	4.2	5.1	0	0	Forcemain

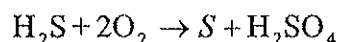
This dissolved sulfide data taken from the City's collection system demonstrates that the City's system has levels significantly above what is found in a typical wastewater collection system. Liquid phase treatment is generally considered if the dissolved sulfide concentrations exceed 1.0 mg/L.

Description of Alternatives

Liquid-phase odor-control strategies reduce odors by reducing the unionized or total sulfide concentration of the liquid waste stream. Although domestic wastewater odors are caused by a variety of organic and inorganic compounds, H₂S is typically the predominant odor-causing compound. A summary of these alternatives is presented in Table 13.

Oxygenation and Aeration

Oxygen inhibits the growth of sulfate-reducing bacteria, chemically oxidized sulfide, and promotes aerobic growth that biologically oxidizes sulfide. At dissolved oxygen levels over 0.5 mg/L, liquid sulfide levels will typically be below 0.1 mg/L. Oxygen reacts with H₂S in accordance with the following reaction:



The reaction with oxygen is very slow (half-life of about 30 minutes).

Wastewater oxygenation can be accomplished by using low-pressure compressors or blowers to inject air into open channels or basins, Venturi aspirators in combination with pumping, or pure oxygen injection into force mains. The effectiveness of air injection in

controlling odors is affected by the detention time. If the system detention time is greater than 4 hours, the positive effects of oxygenation are overcome by the oxygen uptake rate of the wastewater and additional injection points will be required. Typical uptake rates for domestic sewage range from 2-26 mg/L per hour. Higher temperatures, higher soluble BOD, and longer detention times will result in higher uptake rates.

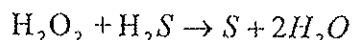
Chemical Oxidants

Liquid oxidants may be injected into the wastewater to remove sulfides. Since they are not target-specific, some of the injected oxidant will oxidize other materials within the wastewater. Thus, more oxidant must be injected than would be required to stoichiometrically react with the sulfide. Chemical oxidants used to remove sulfides from wastewater include the following:

- Hydrogen peroxide
- Chlorine
- Sodium hypochlorite
- Potassium permanganate

Hydrogen Peroxide

Hydrogen peroxide (H_2O_2 or peroxide) provides a source of dissolved oxygen, which reacts with sulfides at a stoichiometric rate of 1 part H_2O_2 to 1 part H_2S in the following reaction:



However, literature sources indicate that higher dosage rates are required due to interference with other constituents within the wastewater. In previous studies, a San Francisco Bay Area POTW found required H_2O_2 dosages ranging from 5.5-8.3 parts H_2O_2 per one part H_2S .

At high concentrations (50 percent or greater), H_2O_2 is hazardous to handle. However, H_2O_2 is an economically viable alternative only at these higher concentrations. H_2O_2 also requires adequate mixing to achieve complete reaction and has a relatively long reaction time (approximately 30 minutes) compared to other oxidants. Very often, H_2O_2 is injected too far upstream of the control point to allow for this relatively long reaction time.

Sodium Hypochlorite

An alternative to gaseous chlorine is sodium hypochlorite ($NaOCl$), also known as bleach. Household bleach, such as Chlorox brand, is approximately 5-percent sodium hypochlorite. Sodium hypochlorite used for odor control is typically delivered in concentrations between 10 and 15 percent. Hypochlorite is a strong oxidizing agent and reacts with H_2S in wastewater. It reacts stoichiometrically at a rate of 8.8 parts hypochlorite per 1 part H_2S in the following reaction:



As in the case of gaseous chlorine, hypochlorite acts as an indiscriminate oxidant. As a result, the dosage range is between 10 to 15 parts sodium hypochlorite per 1 part H_2S . One disadvantage of sodium hypochlorite is that if anaerobic conditions are encountered, hydrogen sulfide will be present again. Therefore, oxidants need to be injected closer to the treatment plant.

Nitrate Addition

Nitrates do not react with the H_2S ; rather, they prevent its formation. Normally, in the absence of free oxygen, sulfate-reducing bacteria will preferentially use nitrate as the terminal electron acceptor, thereby preventing the formation of H_2S . Any H_2S that has already formed is not affected because nitrates act only with the bacteria.

Nitrate is available in both liquid and dry forms from a number of sources. The various types of nitrate are sodium nitrate, ferric nitrate, and calcium nitrate. Calcium nitrate is commonly used in wastewater odor control and corrosion control applications and is available under the trade name of BIOXIDE™. This proprietary calcium nitrate solution has been tested in the City of Los Angeles's sanitary system, the Clark County Sanitation District's collection system, and the New Haven, Connecticut, interceptor systems with success. Sodium nitrate is also available under the trade name of NITRAZYME™.

Iron Salts

Iron salts can be added to the waste stream to form a metal sulfide precipitate. This reaction binds the H_2S in solid precipitants so it cannot escape into the air. Ferric chloride salts ($FeCl_3$) react stoichiometrically with H_2S in wastewater at a rate of 2 parts ferric chloride per 3 parts H_2S in the following reaction:



Iron salts, however, also act indiscriminately with other materials. As a result, the dosage ratio ranges from 7 to 20 parts ferric chloride per 1 part H_2S .

Collateral benefits of using iron salts include increased BOD and total suspended solids removal at primary sedimentation tanks, lowered wastewater phosphorus, improved solids settling in secondary clarifiers and digesters, and reductions in the amount of polymer needed for solids conditioning at dewatering. Disadvantages include the need for special handling, including eye and skin protection requirements. In addition, iron salts may have very low pH (0.5-2.5) and can corrode stainless steel, brass and aluminum pumps. Other concerns include the availability of a reliable source of chemicals.

pH Stabilization

There are two methods of reducing H_2S -related odors using pH adjustment. One method shifts the wastewater pH so that chemical equilibrium favors non-odorous sulfide species. The other method uses a temporary, but drastic, pH shift to kill the sulfur-reducing bacteria that produce H_2S . Both methods typically rely on sodium hydroxide as their chemical agent. Only caustic shock dosing is discussed here.

Caustic Shock Dosing

Shock dosing the bacteria living in the interceptor slime layer can also be used to control odor. At very high pH's, sulfate reducing bacteria activity stops. Caustic shock dosing, achieved by adding enough caustic to raise the pH of the wastewater to 13.0 or higher for 20 to 30 minutes, has been demonstrated to inactivate the sulfate-reducing bacteria for periods of 3 to 14 days. Caustic shock loading, practiced by the County Sanitation Districts of Los Angeles, found that a dose of approximately 3,125 pounds of 50-percent caustic solution per

million gallons of wastewater was required for 30 minutes to obtain odor control from shock loading.

TABLE 13
Chemical Control of H₂S and Corrosion in Sewers

Approach	Method	Objective	Advantages	Disadvantages	Typical Dosage ^a	Capital Cost ^b	Operating Costs ^c
Improve oxygen balance in wastewater	Good operation and maintenance	Maintain good flow velocity, minimize solids deposition	No additional chemical costs	Effectiveness limited by sewer design and operating conditions	NA	NA	Included in system O&M cost
	Air injection	Increase oxygen in wastewater using compressed air, venturi aspirators, or U-tubes	No chemical costs for air	Low efficiency Control limited Possible off-gassing of odors	10 mg air /mg sulfide	\$4.5/ m ³ .d	Power, compressor facility life cycle
	Oxygen injection	Increase oxygen in wastewater using liquid oxygen or on-site generation	High efficiency vs. air Low chemical hazard	Must be introduced in pressurized pipe (force main, sidestream or U-tube)	2 mg O ₂ /mg sulfide	\$4.5/ m ³ .d	\$0.75/kg O ₂ + facility life cycle
Chemical oxidation in wastewater	Sodium hypochlorite solution injection	Oxidize dissolved sulfides to sulfate	Safe vs. chlorine gas	Unstable in storage More cumbersome and costly in bulk quantity	6 mg Cl/mg sulfide	\$3/m ³ .d	\$1.30/kg Cl ₂ + facility life cycle
	Hydrogen peroxide solution injection	Oxidize dissolved sulfides to sulfate	Rapid reaction rate Simple equipment	High chemical cost Unstable in storage	1 mg H ₂ O ₂ /mg sulfide	\$3/m ³ .d	\$4.5/kg H ₂ O ₂ + facility life cycle
	Nitrate addition (BIOXIDE™)	Provide chemical source of oxygen preferred over sulfate by bacteria	Slow-reacting; long lasting Low chemical hazard Simple equipment	High chemical cost Adds nitrogen	10 mg NO ₃ /mg sulfide	<\$1.5/m ³ .d	\$2.00/kg NaNO ₃ + facility life cycle
Precipitation of sulfides from wastewater	Iron salts such as ferrous sulfate or ferric chloride	Formation of solid particles of insoluble metallic sulfide	Simple equipment Usually available	Increases metal loading downstream	2 mg Fe/mg sulfide	<\$1.5/m ³ .d	\$11/kg Fe + facility life cycle
Alkaline pH shock of wastewater	Caustic Shocking: Periodic (weekly) dosing with sodium hydroxide solution	Upset slime layer and temporarily reduce sulfide generation	Minimal capital investment Moderate chemical cost	Hazardous chemical handling Unpredictable effectiveness	As required to produce target pH	<<\$1.5/m ³ .d	varies

^aOne typical dosage shown; actual dosages vary widely, and pilot testing is recommended to confirm actual required dosage

^bApproximate capital cost in \$ shown for installation of treatment at one site for 40,000 m³/day wastewater flow

^cApproximate chemical cost shown in \$ on m³/day unit basis (shown as m³.d) on dry weight basis and in required form (e.g., solution)

Sources: USEPA, 1985; Sulfide in Wastewater Collection and Treatment Systems, presented to ASCE, 1989; and CH2M HILL

Comparison of Alternatives

Both the sampling results and modeling exercise indicate the production of sulfides in the collection system at levels that make liquid phase sulfide control a cost-effective part of an integrated odor management strategy. As part of an initial screening of options, CH2M HILL identified several liquid phase treatment alternatives that the City could initiate within the collection system. A short list of options that would most likely provide an acceptable level of sulfide control was developed that includes:

- Ferric Chloride (iron salts) addition – the iron reacts with sulfide molecules to form a non-dissolvable product that is removed in the clarifiers of the treatment facility. If available, ferrous chloride can also be used. Ferrous chloride is produced by metal products producers during the “pickling” process of raw steel.
- Bioxide™ addition – this proprietary product adds nitrates to the wastewater, thereby preventing the production of sulfide compounds.
-
- Shock dosing using 25% Sodium Hydroxide solution – this process raises the pH in the wastewater to more than 12 for a contact period of 20 minutes and is performed approximately every 10 to 14 days. The high pH condition kills the sulfide-generating bacteria. However, immediately following treatment, sulfide-generating bacteria repopulate the sewer and sulfide production begins to increase.

Table 14 provides information on differences in chemical demand and usage for the anticipated liquid phase treatment assumed to be used for five months during the dry season only (June-October), based on an annual average flow of 5.7 mgd. A summary of the cost evaluation results for all odor control alternatives is presented in Table 15. Material Safety Data Sheets (MSDS) for each chemical considered are included in Appendix K.

TABLE 14
Dosages and Annual Costs for Chemicals Evaluated

Item	Ferric Chloride (FeCl ₃)	Calcium Nitrate (Ca(NO ₃) ₂) (Bioxide™)	Sodium Hydroxide (NaOH) ¹
Interceptor to be Dosed	Boyd	Boyd	Southside
Dosing Location	Boyd Lake PS	Boyd Lake PS	Southside PS
Assumed Chemical dosage	20 lb FeCl ₃ /lb sulfide removed	1.3 lb Ca(NO ₃) ₂ /lb sulfide removed	3,125 lb/MGD wastewater
Chemical unit cost	\$0.15 lb active chemical (37% solution)	\$1.95/gallon	\$1.0/lb active chemical (50% solution)
Chemical Required (lbs/day) (gallon/day)	2,552	189	17,902/dose
Chemical Costs (\$/day)	\$378	\$367	\$17,902/dose
Chemical Costs (\$/season)	\$68,085	\$66,683	\$268,567

¹ Shock dosing once every 10 days.

TABLE 15
Cost Evaluation of Liquid-Phase Odor Control Alternatives

Cost Type	Odor Control Alternatives		
	FeCl ₂	Bioxide™	NaOH
Capital cost ¹	\$35,000	\$20,000	\$0
Pump replacement cost ²	\$7,000	\$7,000	\$0
Annual Chemical Cost	\$68,085	\$66,383	\$268,567
Total 20-Year Life Cycle Cost³	\$1,004,472	\$965,281	\$3,816,411

¹Capital costs include pumps, tanks, and containment and do not include additional building and SCADA costs

²Assume metering pumps replaced once every 10 years.

³Life cycle costs include capital costs plus present worth of annual costs using an interest rate of 3.5% for 20 years.

CH2M HILL considered both economic (capital, operating and maintenance costs) and qualitative (non-monetary) criteria when evaluating the four alternatives. Table 16 contains a summary of our assessment of the qualitative criteria. A rating value developed by City staff allowed CH2M HILL to rank the three technologies. A weighting level of 3 is considered the most favorable and a rating value of 1 is least favorable. The technology with the highest total is considered the most favorable from a non-economic perspective. Some evaluation criteria were more heavily weighted to reflect their higher importance. A weight of 1 is least important and a 3 most important. The alternatives are then ranked, with the highest weighted score ranked the highest.

TABLE 16
Qualitative Evaluation of Liquid-Phase Odor Control Alternatives

Evaluation Criteria	Criterion Weight	Chemical Alternatives		
		Ferric Chloride (FeCl ₃)	Bioxide™ (Ca(NO ₃) ₂)	Sodium Hydroxide (NaOH)
Proven technology/reliability	3	3	3	2
Odor removal efficiency	3	3	2	2
Space requirements	2	2	1	3
Maintenance requirements	1	1	2	3
Operational Ease	2	2	3	2
Hazardous nature of materials	3	1	3	1
Total Weighted Score		30	34	28
Ranking		2	1	3

Liquid Phase Treatment Conclusions

Sampling results, combined with a modeling exercise using in-house models indicates that factors within the wastewater collection system contribute significantly to odor emissions at the treatment plant. These factors include long detention times and numerous forcemains that lead to the production of H₂S and other reduced sulfur compounds.

The modeling exercise indicates that the Boyd Interceptor and Boyd Relief Interceptor contribute most to the sulfides at the plant. The Southside Interceptor contributes a small portion of the overall sulfide loading to the plant, but the sampling program showed that the forcemain discharge generates high peak hydrogen sulfide concentrations within the headworks area. These peaks likely generate short-term odor releases that could lead to odor complaints. CH2M HILL recommends an odor management strategy that addresses both of these contributors.

Literature and CH2M HILL's experience indicates that liquid phase treatment of odor generating compounds in the collection system forms a cost effective component of multi-phased odor management plans for wastewater treatment facilities when the influent dissolved sulfide concentrations exceed 1.0 mg/L. The modeling exercise predicts a worst-case influent wastewater dissolved sulfide concentration of more than 5 mg/L. Accordingly, the City should consider incorporating a liquid phase program as part of the overall control strategy.

CH2M HILL has considered several sulfide control options. Ferric Chloride addition has the second highest life-cycle costs and ranks third in the non-economic evaluation. Ferric chloride requires special handling procedures and is a corrosive product. Bioxide™ has the lowest life-cycle cost, but may require more stations than ferric chloride. However, the product is relatively harmless and does not have the same handling and storage requirements. Based on the dosage rates and approximate chemical costs used in the analysis, sodium hydroxide (NaOH) appears to be cost prohibitive. The NaOH alternative cost is calculated on shock dosing every 10 days, and actual shock dosing requirements could vary. However, even with major adjustments in unit chemical costs and dosage requirements, the costs would not be competitive with the other chemicals.

CH2M HILL recommends that the City begin with Bioxide™ (or equivalent) on the basis that it is the most cost effective and will be added at the lift stations, which will provide an additional benefit of corrosion control in the collection system. The City should consider contacting Castle Rock, Colorado staff regarding their Bioxide™ program and its success. The following approach is suggested for proceeding with the liquid phase, sulfide control program:

1. Conduct a pilot test with Bioxide™ (or equivalent) being added at the Eastside lift station. During the pilot test, conduct sampling of both the dissolved sulfide levels of the influent and the H₂S concentrations at the odors sources.
2. If the pilot test is effective, implement permanent Bioxide™ (or equivalent) dosing stations for Boyd systems first (Eastside and Boyd Lake lift stations), then addresses the smaller contributors should further odor reductions be needed.

3. If the Bioxide™ is not effective, conduct a pilot test with another liquid phase treatment chemical, such as ferric chloride.
4. Commit to a data collection program that will allow stakeholders to evaluate the impact of the proposed mitigation measures. The data collection program would involve monthly sampling of the dissolved sulfide levels at the influent, as well as sampling the odor sources for H₂S using a Jerome meter.

Conclusions

The baseline odor assessment provides useful information that will enable the development of effective odor control improvements. The assessment establishes:

1. Extent of off-site impacts from the existing treatment plant.
2. Process units that are potential contributors to off-site odor impacts.
3. Effectiveness of various odor control scenarios.

The Loveland WWTP currently has several significant sources that contribute to off-site odor impacts, including the digester boiler room vent, aerated grit chamber, DAFT, and trickling filters.

The worst-case baseline modeling, based on the maximum H₂S concentrations obtained from Jerome meter sampling events in October 2003, shows that the current odor impacts above the 7 D/T odor threshold extend off-site mainly in northeast and southwest directions. The number of hours above 7 D/T is greatest along the northern side of the plant boundary (over 1,500 hours per year). The average condition baseline modeling, based on the flux chamber sampling results, shows the much smaller impact than the worst-case baseline modeling, although the shape of the isopleths is similar. The isopleths also tend to extend mainly in northeast and southwest directions. The highest exceedences (about 1,000 hours per year) also occurred at the north end of the plant.

The control modeling results show that odor control approaches represented at Stage 1 to Stage 4 can efficiently reduce the off-site impact. The maximum 5-minute off-site odor impact is reduced from about 1,130 D/T at Baseline to about 150 D/T at Stage 4. The highest exceedence is reduced from about 2,700 hours per year in the Baseline modeling to approximately 840 hours per year at Stage 4. They either eliminate the identified big odor sources completely, such as the trickling filter, or convert the major odor sources into the odor control scrubbers that emit significantly less odor, such as the chemical scrubber treating the headworks and grit chambers at Stage 3. In order to bring the Loveland WWTP within their desired odor control goal of less than 7 D/T 99percent of the time, the City may be required to conduct additional odor control. The primary clarifiers would be the next significant source of odor control.

Recommendations

In general, Loveland WWTP should continue its ongoing policy of implementing source control and general odor prevention O&M policies, procedures, and approaches to ensure that:

- The headworks scrubber is fully functional and effective
- Short-term fugitive sources are handled
- Process equipment going out of service or drained is controlled

The results of the modeling conducted as part of this Odor Management Plan indicate that the currently planned odor control projects will move the Loveland WWTP toward its odor reduction goal of no odors less than 7 D/T 99 percent of the time, set as part of this project. In addition, some immediate suggestions are provided to help reduce the off-site odor impact quicker.

Immediate Recommendations

Several other best management practices (BMPs) and operation and maintenance (O & M) enhancements could improve the odor prevention program at the Loveland WWTP. The BMPs and O & M enhancements can be implemented immediately and can help reduce the risk of off-site odor impacts. These BMPs and O & M enhancements include:

- **Investigate the boiler room for potential leaks to the HVAC system.** As recommended in Stage 1, this is a significant odor source should be reduced through fairly minor investigation and repair.
- **General housekeeping to reduce fugitive emissions.** Several housekeeping measures are already in place such as:
 - Primary clarifiers are cleaned regularly.
 - Digester gas is combusted.
 - Vessels are cleaned immediately after they are removed from service and drained.

Additional housekeeping measures to consider include washing down process tanks during draining to reduce odor generation and adding hypochlorite tablets to the tanks that are already drained and have small amounts of liquid collected on the bottom.

- **Monitor the sludge blanket in the primary clarifiers** to keep it at a minimum and, if possible, reduce the amount of vertical drop in the effluent weirs. The drop at the effluent weirs promotes stripping of odorous compounds.

As the community surrounding the Loveland WWTP becomes more odor sensitized it will be increasingly more important for the Loveland WWTP to be perceived as a good neighbor. Several recommendations are provided to improve the Odor Response Program, be proactive in the neighborhood, and respond to off-site odor complaints. Loveland WWTP should consider increasing public outreach efforts and informing key community members

of plant upset conditions, for example, and steps being taken to address odor events. One way to increase community involvement is to invite members of the community on-site before and after anticipated events that would cause an increase in odors.

Additional Odor Response actions to consider include:

- **Odor Monitoring.** Odor monitoring programs are helpful to understand the plant's odor sources and the conditions that contribute to significant odor problems off-site. Loveland WWTP should develop on- and off-site odor monitoring using operators or selected staff to routinely check for odors and their off-site impacts at selected odor monitoring stations. This team should visit odor monitoring stations once a day, as well as monitor collection system locations to ensure that the collection system is not adding to the odor problem. The Jerome meter should be used, as well as the nose, to estimate odor and H₂S levels. The Jerome meter sampling performed as part of the Odor Management Plan can be considered the first round of odor monitoring.
- **Consider installing a meteorological station** at the Loveland WWTP to provide better data for future odor modeling.
- **Develop response protocols for high odor events.** Loveland WWTP should develop response protocols for high odor events that consist of a list of immediate odor control strategies available to prevent or reduce the odor from traveling off-site or adversely impacting the community.
- **Have on hand portable odor control units** that can be used for equipment take downs, digester cleanings, and short-term odor vents that need controls.

Short-Term and Long-Term Recommendations

Based on the results of the modeling analysis, short- and long-term odor control improvements are also recommended, as shown in Table 17. These recommendations are based on the City's goal of reducing off-site odor impacts of less than 7 D/T 99 percent of the time.

Plant emissions are variable and so are removal efficiencies of odor control systems. After each phase of capital improvements, the sources should be resampled and the odor dispersion model rerun to predict the current plant conditions. This will enable the City to assess the effectiveness of the phased recommendations and confirm if all the capital improvements below are required, or if there are other new odor sources that require control. The cost of a Jerome meter is included in Odor Control Stage 3 so the City can conduct the confirmation sampling. The effort to re-run the dispersion model is included in Stage 4 to confirm the odor control benefits of the stages up through Stage 4. The long-term recommendations provided in Table 17 may or may not be necessary in the future, and careful evaluation should be performed before implementation.

The long-term recommendations describe in general what type of odor control can be provided for each source. Odor control consists of capturing the air with covers and/or equipment enclosures and treating the air with odor control equipment. Many odor control technologies are available to meet the newer, more stringent odor prevention and control

criteria. The technologies that are considered for the City are liquid-phase treatment, single-stage packed tower scrubbers, carbon adsorption, and biofiltration. For the purposes of budgetary planning, a reasonable control technology has been assumed. As the City progresses with each project, a detailed technology selection should be conducted.

A summary of the recommended long-term improvements, with cost estimates, are included in Table 18. The detailed cost estimates are included in Appendix L. CH2M HILL recommends that the City plan to incorporate Stages 1 through 5 in their current CIP. It is anticipated that this level of odor control will meet the proposed odor control standard, given the conservative nature of the analysis. For the City to have a zero odor emissions plant, the cost would include all stages and would be approximately \$5 million.

The cumulative odor reductions to be expected from each odor control stage, including liquid phase treatment, are shown in Figure 5. It is assumed that liquid phase treatment is implemented after the trickling filter is taken off-line (Stage 1) and the digester boiler room HVAC intake vent is relocated (Stage 2). For Stages 3 through 7, the predicted odor reduction is shown for each stage with and without the cumulative impact of liquid phase treatment. As additional odor control improvements are implemented, the additional odor reduction impact of liquid phase treatment becomes insignificant. However, liquid phase treatment continues to have benefit by reducing the chemical requirements for the odor control scrubbers.

TABLE 17
Summary of Recommendations for Loveland WWTP Odor Sources

Odor Source	Immediate Recommendations	Short-Term Recommendations	Long-Term Recommendations
WWTP Site	<ul style="list-style-type: none"> - Select a liquid phase chemical treatment process. - Consider a short-term, shock dosing program (sodium hydroxide) on the Southside forcemain to reduce odor peaks at the treatment plant. 	<ul style="list-style-type: none"> - Develop a phased implementation program that addresses the Boyd systems first, then addresses the smaller contributors should further odor reductions be needed (\$35,000 + up to \$68,000 annual cost for seasonal use) 	<ul style="list-style-type: none"> - Address future odor impacts from new sources under CIP program. - Update Odor Management Plan after each phase of the odor control program to verify results and if additional improvements are still needed. - Consider odor control for primary clarifiers if still getting small odors that add up from fugitive emissions occurring from all sources.
Digester Boiler Room Vent	<ul style="list-style-type: none"> - Investigate boiler room, boilers, and digester system for potential fugitive leaks into the boiler room HVAC. Repair any leaks found. 	<ul style="list-style-type: none"> - Relocate HVAC intake vent away from the digesters and digester overflow weirs (Stage 2) 	<ul style="list-style-type: none"> - If relocating HVAC vent does not reduce odors, may be required to install odor control for boiler room HVAC.
Aerated Grit Chamber	<ul style="list-style-type: none"> - None recommended 	<ul style="list-style-type: none"> - Cover aerated grit basin with aluminum covers and vent foul air to new, temporary carbon odor control unit (water regenerable carbon) (Stage 3) 	<ul style="list-style-type: none"> - Will be replaced as part of new or modified Headworks Building
DAF Thickener	<ul style="list-style-type: none"> - Routine cleaning - Keep the doors closed and provide better ventilation or replace fan 	<ul style="list-style-type: none"> - None recommended 	<ul style="list-style-type: none"> - Confirm offsite impacts from DAF thickener - If necessary, maintain negative pressure inside DAF, and ventilate foul air to new odor control equipment
Trickling Filters	<ul style="list-style-type: none"> - Remove trickling filters from service in December 2004 (Stage 1) 	<ul style="list-style-type: none"> - None recommended 	<ul style="list-style-type: none"> - None recommended

TABLE 17
Summary of Recommendations for Loveland WWTP Odor Sources

Odor Source	Immediate Recommendations	Short-Term Recommendations	Long-Term Recommendations
Headworks Building	<ul style="list-style-type: none"> - Carefully consider wind direction and strength when open garage and removing grit bins - Direct as much building air as possible into the carbon scrubber, seal off rooms and bins to better focus odor removal and supply air. - Minimize entry into the building. 	<ul style="list-style-type: none"> - Install liquid-phase treatment that will reduce the hydrogen sulfide loads for the odor control and provide better odor and corrosion control in the collection system. 	<ul style="list-style-type: none"> - Accelerate the schedule for the Headworks Building and associated odor control prior to the WAS thickening project. Start design in 2005. Screw pumps and aerated grit chamber odor sources will be replaced as part of the new or modified Headworks building. - Ventilate new Headworks facility to minimum of 12 to 20 air changes per hour (ACH), and treat with new single-stage chemical scrubber that is polished by the carbon scrubber or biofilter (Stage 4).
Screw Pumps	None recommended	<ul style="list-style-type: none"> - Install liquid-phase treatment that will reduce the hydrogen sulfide loads for the odor control and provide better odor and corrosion control in the collection system. 	<ul style="list-style-type: none"> - Will be replaced as part of the new or modified Headworks Building
Primary Clarifiers	<ul style="list-style-type: none"> - Consider flooding launders and removing sludge blankets quickly. 	<ul style="list-style-type: none"> - If odor complaints persist, consider odor neutralizer for primary clarifiers on days when strong odor/H₂S is observed (\$10,000 + up to \$8,000 annual chemical costs) 	<ul style="list-style-type: none"> - After completion of improvements listed above and if odor complaints persist, cover primary clarifiers, splitter box, influent junction boxes, and effluent junction box and ventilate to new odor control equipment (Stage 6).
Flare	<ul style="list-style-type: none"> - Maintain burner ignition system - Increase preventative maintenance programs and focus during odor compliant season 	None recommended	<ul style="list-style-type: none"> - After completion of improvements listed above and odor complaints persist install enclosed flare system
Aeration Basins	None recommended	<ul style="list-style-type: none"> - Resample aeration basins to ensure they are not a significant source of remaining off-site odor impacts 	<ul style="list-style-type: none"> - After completion of improvements listed above and if odor complaints persist, odor control would be to cover and treat similar to primary clarifiers (Stage 7).

TABLE 17
Summary of Recommendations for Loveland WWTP Odor Sources

Odor Source	Immediate Recommendations	Short-Term Recommendations	Long-Term Recommendations
Digesters	<ul style="list-style-type: none"> - Routine maintenance and cleaning - Removal of all foam from the cover immediately - Conduct routine maintenance to prevent foaming and upset conditions 	None recommended	None currently recommended. If odor complaints persist after the above recommendations are implemented, consider retrofitting digesters to have fixed roofs. Fixed roof digesters would eliminate fugitive leaks from the circumference of the digester (Stage 7)
Biosolids Truck Loading	None recommended	None recommended	None recommended. Odor control would be an enclosed truck loading area with odor control provided.

TABLE 18
Cost Summary for Long-Term Recommendations

Odor Control Stage	Long Term Recommendations	Air Flow Rate (cfm)	Capital Cost*	Annual Cost	Timing
1	Discontinue use of trickling filters	NA	\$10,000	\$0	2004
2	Rearrange digester boiler vent HVAC system	NA	\$200,000	\$0	2005
LPT	Conduct a pilot test of Bioxide™ or equivalent chemical	NA	\$37,000	NA	2005
	Implement a liquid phase treatment program	NA	\$35,000	\$68,000	2005
3	Cover aerated grit chamber and vent to a carbon scrubber	250	\$68,000	\$6,000	2005
4	Provide odor control for modified Headworks processes, including screw pumps and influent collection well, within existing Headworks building. Vent air from Headworks building a new chemical scrubber polished with bioscrubber or carbon to achieve 99% removal efficiency.	13,000	\$892,000	\$87,000	2006 / 2009
5	Vent air from DAFT in a new carbon scrubber.	800	\$84,000	\$18,000	2008
6	Cover primary clarifiers and vent to new chemical scrubbers	3,800	\$1,614,000	TBD	TBD
7	Cover aeration basins and vent to new chemical scrubbers. Replace digester covers with fixed roof covers	8,600	\$3,353,000	TBD	TBD

*Total capital costs include construction and engineering costs. Construction costs include 30% contingency; engineering costs are estimated at 25% of construction cost

cfm = cubic feet per minute

The average annual costs are also estimated in Table 18. For future operations at the Loveland WWTP with full scale odor control, the annual operating costs for odor control could be as high as 5 to 15 percent of the annual operating budget. This is what a typical WWTP spends on odor control.

References

Diosey, Phyllis G., Maureen E. Hess, and Lorraine Farrell, *Evaluation of Alternative Dispersion Models for Use in Odor Management*, WEFTEC 2002 75th Annual Technical Exhibition and Conference, Conference Proceedings, WEF, Alexandria, VA.

Odor Control in Wastewater Treatment Plants, WEF Manual of Practice No. 22, Water Environment Federation, 1999, pg. 8.

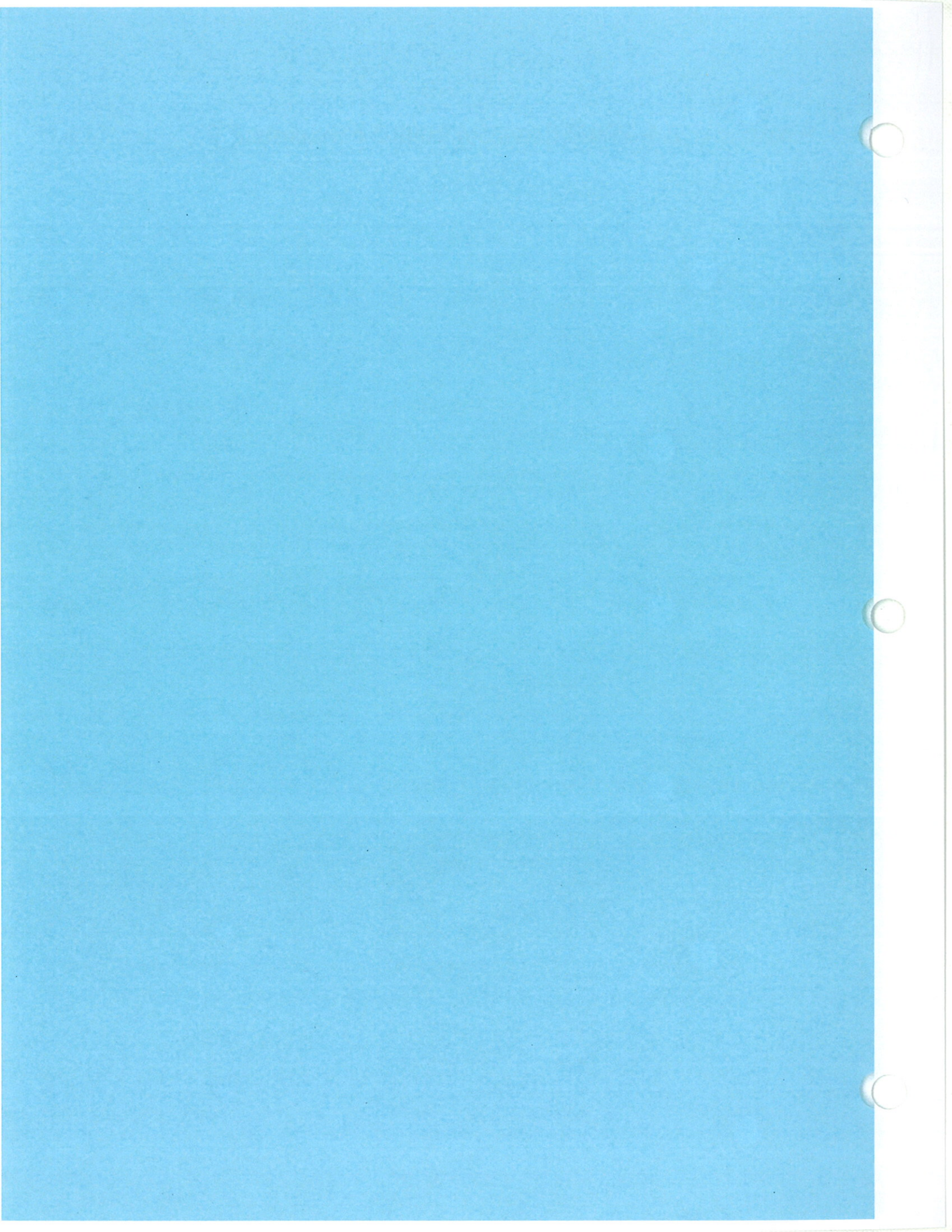
Porter, R.C.; W.G. Hoydysh; and E.T. Barfield. 1994. Odors: Demonstrating Compliance at Publicly Owned Treatment Works. WEF Specialty Conference Proceedings, Jacksonville, FL, *Odor and Volatile Organic Compound Emission Control for Municipal and Industrial Wastewater Treatment Facilities*, Water Environment Federation, pp. 11-35 to 11-51.

TNRCC, Air Permit Technical Guidance For Chemical Sources: Flares and Vapor Oxidizers, October 2000.

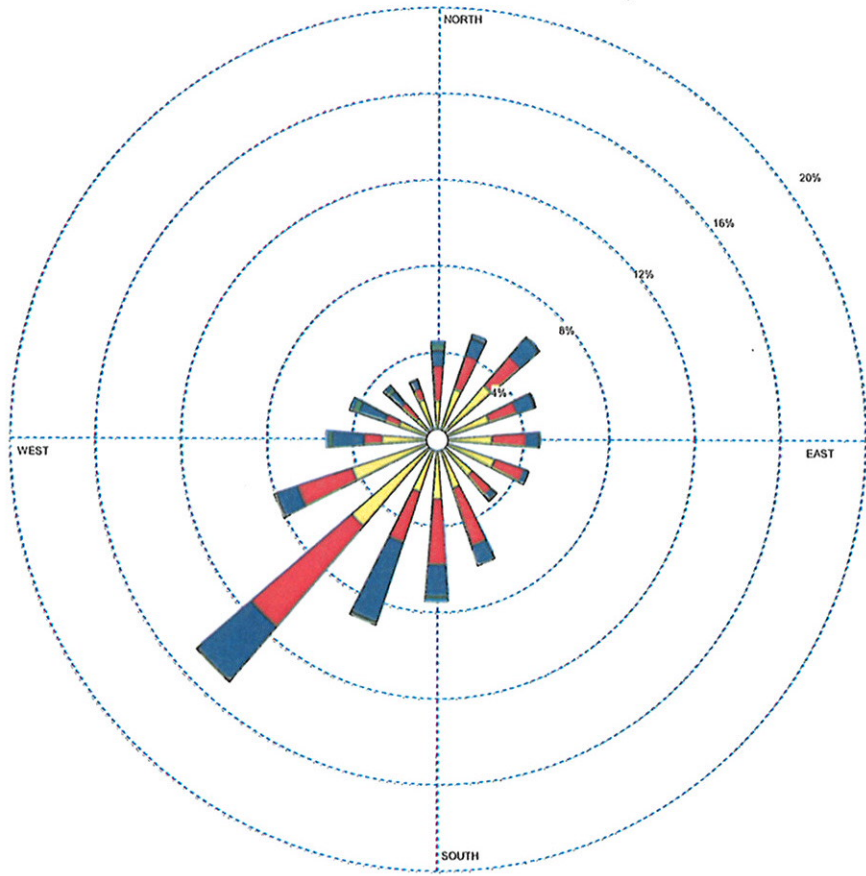
CH2M HILL, Odor Control Investigation and Odor Response Manual for the South Treatment Plant, July 2003.

CH2M HILL, Spokane Advanced Wastewater Treatment Plant PMO Odor Management Plan, December 2003.

Appendix A – Windroses for 2003 by Season



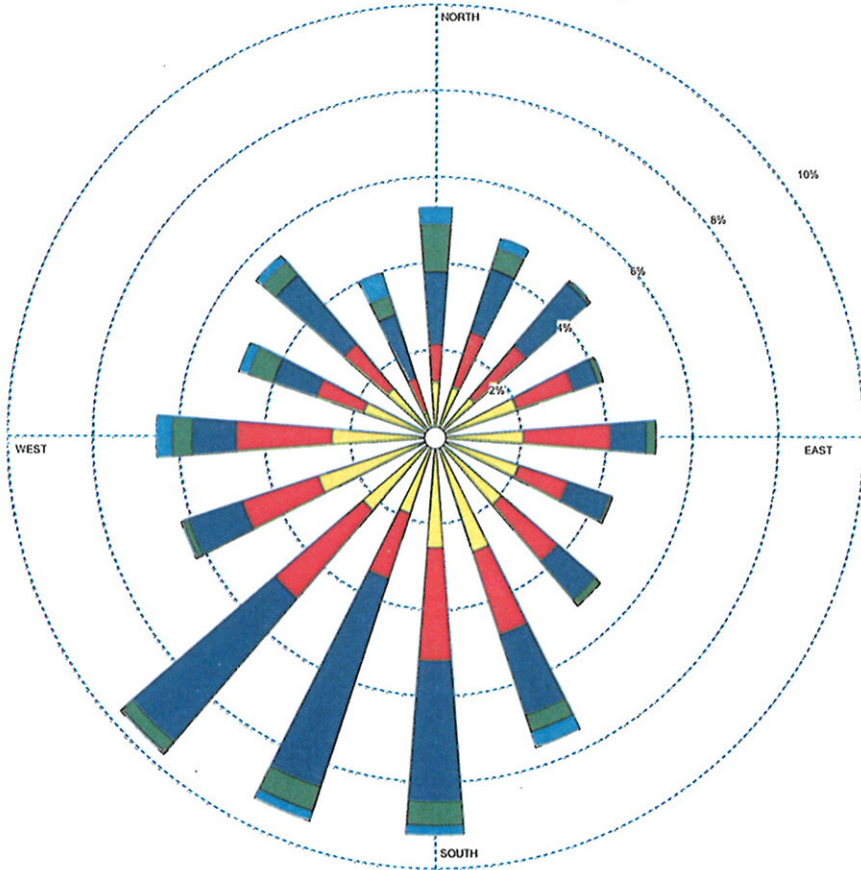
WIND ROSE PLOT
 Station #25650 - ,



Wind Speed (m/s) 	MODELER 	DATE 12/1/2004	COMPANY NAME
	DISPLAY Wind Speed	UNT m/s	COMMENTS
	AVG. WIND SPEED 4.11 m/s	CALM WINDS 4.85%	
	ORIENTATION Direction (blowing from)	PLOT YEAR-DATE-TIME 2003 Sep 1 - Nov 30 Midnight - 11 PM	PROJECT/PLOT NO.

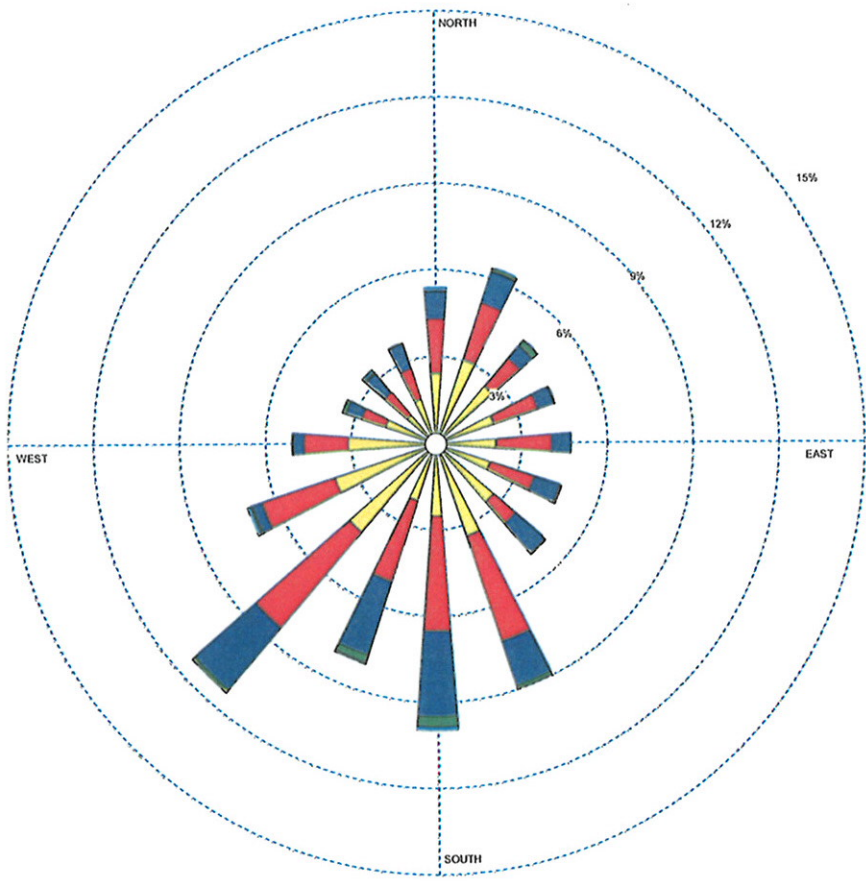
WRPLOT View 3.5 by Lakes Environmental Software - www.lakes-environmental.com

WIND ROSE PLOT
Station #25650 - ,

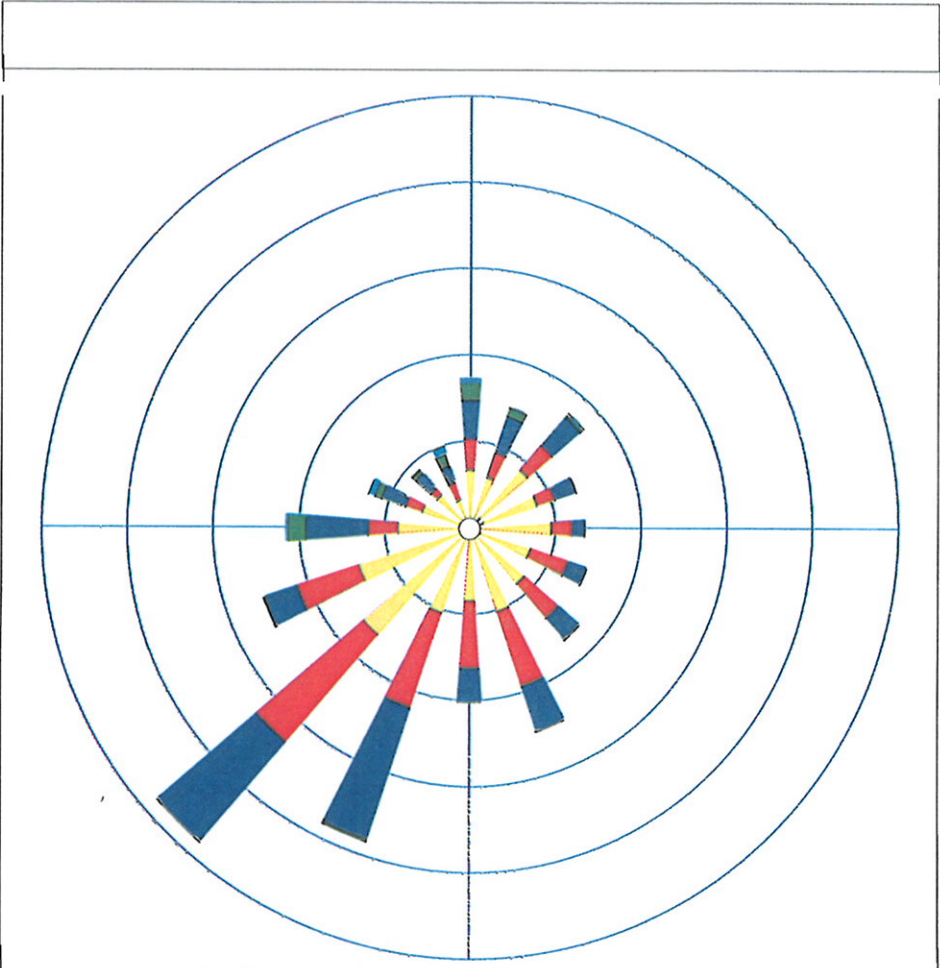


<p>Wind Speed (m/s)</p> <ul style="list-style-type: none"> > 11.06 8.49 - 11.06 5.40 - 8.49 3.34 - 5.40 1.60 - 3.34 0.51 - 1.60 	<p>MODELER</p>	<p>DATE</p> <p>12/1/2004</p>	<p>COMPANY NAME</p>
	<p>DISPLAY</p> <p>Wind Speed</p>	<p>UNIT</p> <p>m/s</p>	<p>COMMENTS</p>
	<p>AVG. WIND SPEED</p> <p>5.04 m/s</p>	<p>CALM WINDS</p> <p>3.40%</p>	
	<p>ORIENTATION</p> <p>Direction (blowing from)</p>	<p>PLOT YEAR-DATE-TIME</p> <p>2003 Mar 1 - May 31 Midnight - 11 PM</p>	<p>PROJECT/PLOT NO.</p>

WIND ROSE PLOT
 Station #25650 -

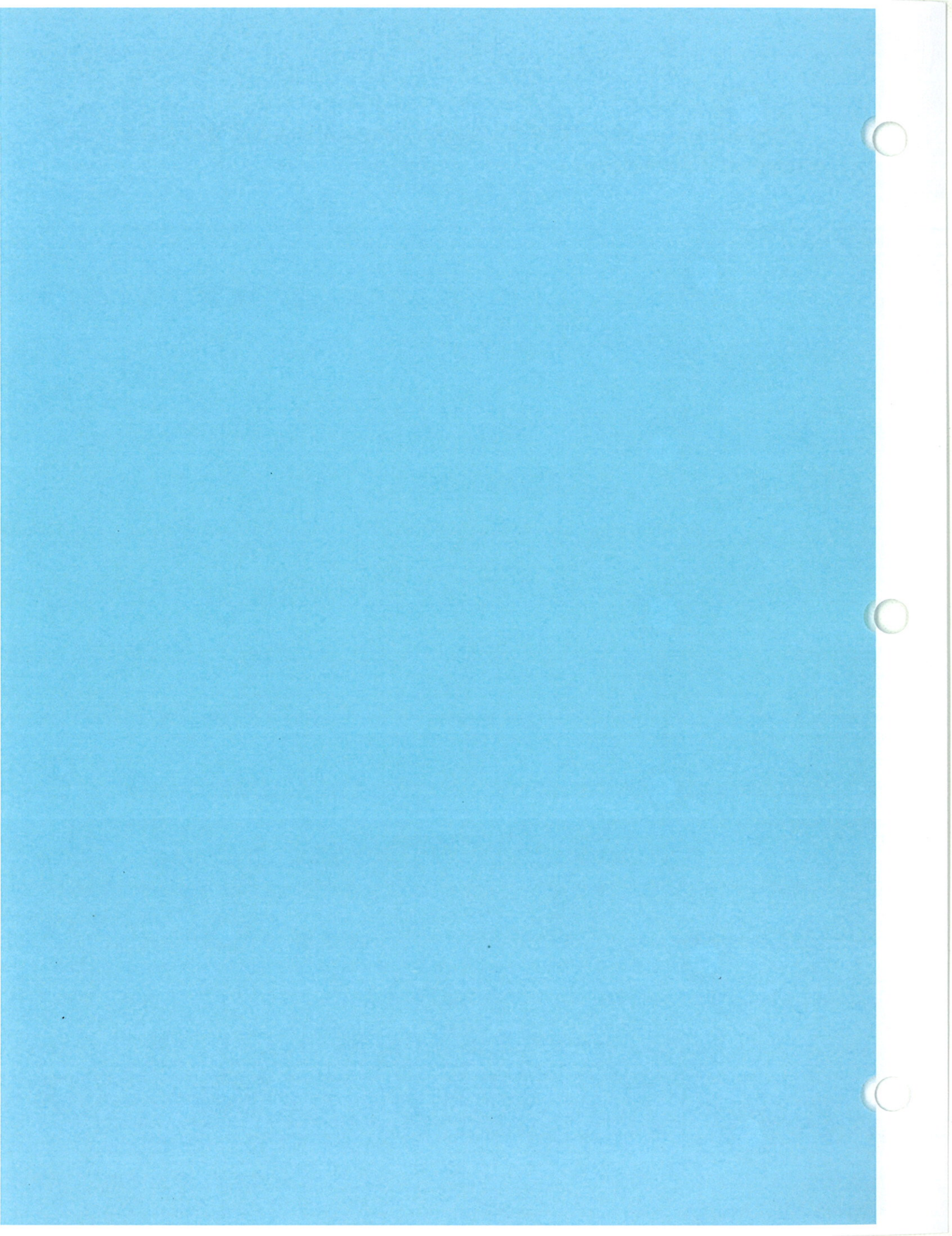


Wind Speed (m/s) 	MODELER 	DATE 12/1/2004	COMPANY NAME
	DISPLAY Wind Speed	UNIT m/s	COMMENTS
	AVG. WIND SPEED 4.10 m/s	CALM WINDS 3.61%	
	ORIENTATION Direction (blowing from)	PLOT YEAR-DATE-TIME 2003 Jun 1 - Aug 31 Midnight - 11 PM	



	MODELER	DATE	COMPANY NAME
	DISPLAY	UNIT	COMMENTS
	AVG. WIND SPEED	CALM WINDS	
	ORIENTATION	PLOT YEAR-DATE-TIME	PROJECT/PLOT NO.
	Wind Speed	m/s	
	4.29 m/s	4.80%	
	Direction (blowing from)	2003 Dec 1 - Feb 28 Midnight - 11 PM	

**Appendix B – State of Colorado Regulation 2, Part A –
General Provisions**



REGULATION NO. 2
Odor Emission Regulations
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Regulation History

Adopted: March 11, 1971
Effective: April 20, 1971

Revised: February 19, 1999
Effective: March 30, 1999

PART A GENERAL PROVISIONS

Pursuant to Section 25-7-109(2)(d), C.R.S., the following Emission Regulations are issued:

- I. No person, wherever located, shall cause or allow the emission of odorous air contaminants from any single source such as to result in detectable odors which are measured in excess of the following limits:
 - I.A. For areas used predominantly for residential or commercial purposes it is a violation if odors are detected after the odorous air has been diluted with seven (7) or more volumes of odor free air.
 - I.B. In all other land use areas, it is a violation if odors are detected after the odorous air has been diluted with fifteen (15) or more volumes of odor free air.
 - I.C.
 - I.C.1. When the source is a manufacturing process or agricultural operation, no violation of Sections I.A. and I.B., Part A, of this Regulation No. 2 shall be cited by the Division, provided that the best practical treatment, maintenance, and control currently available shall be utilized in order to maintain the lowest possible emission of odorous gases and, where applicable, provided there is compliance with Item 4r of the Colorado Department of Health Pasteurized Fluid Milk and Milk Products Regulation adopted April 18, 1967. In determining the best practical control methods, the Division shall not require any method which would result in an arbitrary and unreasonable taking of property or in the practical closing of any lawful business or activity, if such would be without corresponding public benefit.
 - I.C.2. For all areas it is a violation when odors are detected after the odorous air has been diluted with one hundred twenty seven (127) or more volumes of odor free air in which case provisions of Section I.C.1., Part A, of this Regulation No. 2 shall not be applicable.
- II. For the purposes of this Part A of Regulation No. 2, two odor measurements shall be made within a period of one hour, these measurements being separated by at least fifteen (15) minutes. These measurements shall be made outside the property line of the property from which the emission originates.
- III. For the purposes of this Part A of Regulation No. 2, personnel for evaluating odors shall be selected using an "intensity rating test" as outline in "Selection and Training of Judges for Sensory Evaluation of the Intensity and Character of Diesel Exhaust Odors." USPHS Pub. #999-AP-32.
- IV. The Barnebey-Chaney Scentometer, suitable calibrated, or any other instrument, device, or technique designated by the Colorado Air Pollution Control Division, may be used in the determination of the intensity of an odor and may be used as a guide in the enforcement of this Part A of Regulation No. 2.
- V. The provisions of this Part A of Regulation No. 2 shall apply throughout the State of Colorado. Except that this Part A of Regulation No. 2 shall not apply to housed commercial swine feeding operations.

