Responses to feedback on the draft total reduced sulphur (TRS) guideline and the protocol for electronic reporting of values above the TRS guideline

Alberta

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Total reduced sulphur is a gaseous mixture of compounds that contain one or more sulphur atoms, in its reduced state, and are generally characterized by strong odours at relatively low concentrations.

The Clean Air Strategic Alliance (CASA) Ambient Air Quality Objective Project Team reached consensus in the following areas:

1. The current one-hour objective for H_2S is not adequate to address odour.
2. The current 24-hour objective for H_2S protects health but is not adequate to address odour.
3. Odour issues are a concern in Alberta, and there is a gap in the management tools available, specifically with respect to current ambient air quality objectives. A TRS guideline helps bridge this gap.
4. A 30-minute TRS Ambient Air Quality Guideline of 5 ppb is a useful odour management tool.

Consensus was not reached by the CASA Ambient Air Quality Objective Project Team on application of the guideline. Alberta Environment and Protected Areas (EPA) posted the draft guideline for public comment in 2019 and considered the feedback received.

To address comments on reporting burden, EPA provided a draft electronic reporting protocol for automated reporting of values above the TRS guideline and collected public feedback in May 2021. The resulting reporting protocol document is titled *Protocol for Electronic Reporting of Values Above the Total Reduced Sulphur (TRS) Guideline*.

The following tables summarize comments received from stakeholders from the guideline comment period (Table 1) and the reporting protocol document (Table 2) and provide EPA responses. Where attribution is made in Table 1 and Table 2, names of specific commenters were changed to categories such as industrial association, company or airshed to maintain anonymity.

TABLE 1 RESPONSES TO THE COMMENTS ON THE DRAFT TOTAL REDUCED SULPHUR (TRS) GUIDELINE

	Comments	Response
1	What are the desired policy outcomes of the TRS guideline?	Odour is most frequent air quality complaint received by the department. Immediate reporting of values above the TRS guideline will allow regulatory staff to use the data in their investigations of odour complaints. This is not just data gathering for future assessment, timeliness is part of the desired outcome. The purpose of the TRS guideline is to act as an indicator of potential odour issues in the province. Reported data on TRS values above the guideline provides EPA with a mechanism to track and respond to potential odour events, with the overarching goal of odour management (starting with placed-based, as it is currently managed, and eventually working towards a provincial odour management framework).
2	A number of comments were received stating that: • The guideline should only be used to assess odour impacts for residential and recreational areas and not for use in assessing industrial compliance at a facility level. • Industry stakeholders are concerned the guideline will be inappropriately applied and create a burden on industry, including potentially increased reporting, modelling and mitigation costs, even in the absence of true odour issues. • The low concentration required for odour detection is justification for an ambitious target; however, due to the challenge of attributing a wide variety of sources of any TRS exceedance, it is not appropriate to link exceedances with regulatory compliance.	The guideline is to be used for odour management. This is reiterated in the Alberta Ambient Air Quality Objectives and Guidelines document. This document has been updated to provide more clarity on how guidelines are used. The guideline can be used during investigation of odour issues/complaints and to direct management actions in areas where odour is a concern. Management actions to reduce odour may be implemented in areas where there are monitored values above the guideline and/or there have been a number of complaints. Required management actions would be determined by the circumstances (e.g. number and magnitude of values above the guideline and number of complaints). Reference to “non-compliance” and “exceedance” have been removed from the Protocol for Electronic Reporting of Values above the Total Reduced Sulphur (TRS) guideline (herein referred to as the: electronic reporting protocol). While a facility that is required to monitor ambient TRS is required to report on results, values above the TRS guideline do not constitute non-compliance on their own. Interim guidance on application of the TRS guideline has been developed and will be provided to regulatory staff. When the Using ambient air quality objectives in industrial dispersion modelling and individual industrial site monitoring guideline document is updated the interim guidance on application of the TRS guideline use will be rescinded.
3	There were suggestions for changing the wording in the Ambient Air Quality Objectives and Guidelines Summary document with respect to the use of guidelines.	The Ambient Air Quality Objectives and Guidelines summary document has been revised to describe and outline the use of objectives and guidelines, and a separate, new table for odour-based guidelines has been added.
4	Industrial Association: If a guideline is established, a monitored exceedance should not be stigmatized as being unlawful by way of triggering a compliance response: sources can vary, and regional expectations of odourless air can vary dramatically. Instead, the guideline should be used as a regional trigger for consultation, analysis and action.	Monitored values above the guideline will be used to compare to odour complaints and to track trends. Values above the guideline indicate there could be a problem. As indicated in response number one above, management actions would be determined by the circumstances. Reference to the terms “exceedance” and “non-compliance” have been removed from the electronic reporting protocol.

	Comments	Response
5	The agriculture industry recognizes that section 116(2) of the *Environmental Protection and Enhancement Act* exempts agricultural operations following generally accepted practices from environmental protection orders regarding odour. However, this exemption from regulatory action provides no protection for the industry from the public trust issues that would arise from agricultural operations being out of compliance with a TRS guideline. We strongly believe that agricultural operations following generally accepted practices should be in compliance with objectives and guidelines. We will not support a guideline where the application of the guideline could put agricultural operations following generally accepted practice out of compliance. This would have an unacceptable impact on the social license of our industry.	As the comment indicates, agricultural operations are exempt under *Environmental Protection and Enhancement Act* (EPEA) for odour issues. Values above the TRS guideline have also been clarified to not constitute non-compliance; rather values reported over the guideline may indicate an odour problem and can be used to compare with complaints received. If there is TRS ambient monitoring in the vicinity of agricultural operations, this guideline should support current odour management practices. The agriculture industry has plans and guidance they use for controlling odour and working with their neighbours. (e.g. Odour Management Plan for Alberta Livestock Producers and the Clean Air Strategic Alliance (CASA) Good Practices Guide for Odour Management in Alberta). The TRS guideline is intended as a management tool that can be used to help manage odour where there are issues. This guideline can be used by airsheds and industries to indicate when there may be an issue and they can look at their processes, pollution control etc. and work with the government and the public to arrive at an acceptable outcome. A reference to agricultural practices and the *Agricultural Operation Practices Act* was added to the Ambient Air Quality Objectives and Guidelines summary document.
6	How does EPA intend to implement the above TRS objective? We understand that it is meant as an odour monitoring tool. Are we to take from the standard that odour complaints/concerns that cannot be corroborated by a reading greater than 5 ppb(v) TRS are to be considered invalid? Do odour complaints/concerns registered at readings of 5 ppb(v) or less no longer require a facility response?	This is a guideline not an objective. Interim guidance for regulatory staff on application of the TRS guideline has been developed and will be distributed with the guideline. Because of the nature of the mixture and perception of odour by individuals, some people may still perceive odours at lower levels than the proposed guideline. All odour complaints should be taken seriously and addressed, whether the measured value is above the guideline or not. However, odour complaints received may not be related to TRS or to a facility's operation.
7	Is the proposed TRS objectives to be based on 30-min clock-hour averages or a 30-min rolling average	The TRS guideline is based on 30-minute clock averages. i.e. 0-29 min, 30-59 min through the day, not a rolling average.
8	For facilities and stations that monitor only H_2S (i.e. not TRS) will they be subject to the proposed 5 ppb(v) TRS objective?	This is a TRS guideline not an objective. It applies to only TRS monitored data. The H_2S objective applies to H_2S monitoring. The only way the TRS guideline would apply to H_2S is if an agreement/requirement specifies it (i.e., in an EPEA approval).
9	How does EPA expect readings greater than 5 ppb(v) TRS to be reported? Is there an expectation that 30-min TRS values greater than 5 ppb (v) be reported immediately? Neither industry nor the airsheds have the resources to check their TRS monitors constantly or even on a 30-minute cycle? It is impractical.	Ambient air data are reported in accordance with the Air Monitoring Directive (AMD), including monthly reporting of quality assured data to the air data warehouse. To minimize the reporting burden, EPA has developed an electronic reporting protocol. Automated reporting would replace manual reporting of TRS values above the guideline. Data acquisition and monitoring software will be set up to provide automated email reports when values above the guideline are recorded.
10	EPA appears to rely heavily on a document published by the State of Nebraska – Technical Basis for a Total Reduced Sulfur Ambient Air Quality Standard (May 1997). That document does not provide any technical basis for AEP's proposed 30-min TRS 5 ppb(v) standard. Nebraska regulations (Title 129) have an ambient TRS 30-min rolling average air quality standard, but it is set at 100 ppb(v). Furthermore, there are qualifiers to this standard, e.g. Nebraska's 30-min TRS standard does not apply to situations where there is no human exposure.	EPA did not use the Nebraska report to derive the value. The table where the Nebraska number is listed is just a list of TRS objectives and guidelines currently in place in other jurisdictions for comparison. Alberta used the World Health Organization (2000) odour guideline for hydrogen sulphide of 7 µg m^{-3}, 30 minute averaging period, by converting it to 5 ppb H_2S as the surrogate for this TRS guideline, as stated in the draft guideline document.

	Comments	Response
11	It is not appropriate to apply the same odour-based target for TRS province-wide as that would place a burden on industry and the Alberta Airsheds Council (airsheds), which does not relate to odour concerns.	Objectives and guidelines are applied province wide, including odour-based objectives like H_2S, to ensure a base-level of air quality protection province wide. Additional reporting is only necessary if there are monitored values above the guideline. If there is a large number of these values, this indicates that there may be an odour issue that should be investigated. The electronic reporting protocol is meant to reduce reporting burden.
12	The new ambient air quality guideline for TRS as a positive step in terms of advancing odour management in the province by providing an odour-based ambient air quality measurement and reporting system. The previous reliance on the 1-hr H2S objective as an odour management tool was inadequate and inappropriate as the following Table indicates. While the new guideline is a positive step in terms of odour management, the guideline level may need to be re-evaluated (i.e. lowered) once experience on its relation to actual odour events/complaints is gained.	Thank you. We agree that the TRS guideline will be a first step in addressing odour management. The TRS guideline could be reviewed in the future as part of the Ambient Air Quality Objectives and Guidelines setting process.
13	A company does not support the TRS draft guideline and requests that additional consultation is conducted to address concerns which are outlined below: • Reduction in the one-hour averaging period to a 30-minute averaging period will become a reporting burden. • Meaningful consultation by the Alberta Government was inadequate. • Draft TRS guidelines conflict with policy. The Alberta Ambient Air Quality Objectives and Guidelines Summary (January 2019) states that air quality objectives are generally established for one-hour, 24-hour, and annual averaging periods. Occasionally, the underlying information or ambient monitoring method requires that other averaging periods be used. The development of a 30-minute averaging period, without the appropriate scientific support, conflicts with AEP's own policy. • The assumption that all H_2S is TRS is incorrect. The use of the World Health Organization (WHO, 2000) odour guideline for Hydrogen sulphide converted to 5 ppb H_2S does not consider the fact that not all TRS is H_2S. • Monitoring guidance is still required. It is important to ensure that meaningful testing with respect to Alberta Objectives and Guidelines is being conducted. The location of the current airshed ambient station needs to be re-evaluated, especially when creating a significant reporting burden as highlighted in comment #1 above. Monitoring of TRS should be situated in proximity to more populated areas.	• This is a new guideline. There has been no change to an existing objective or guideline. Additional reporting will only be necessary if there are values above the guideline. To minimize the reporting burden, EPA has developed an electronic reporting protocol. Electronic reporting would replace manual reporting of TRS values above the guideline. Data acquisition and monitoring software will be set up to provide automated email reports when values above the guideline are recorded. • A CASA Project Team, which consisted of a wide variety of stakeholders, was used for developing this guideline. Stakeholders provided written perspectives on the proposed guideline to the CASA Board. There was a 60-day online comment period in 2021, which provided the opportunity for further stakeholder comments. Stakeholders meetings were also held in 2022 to better understand concerns. • The shorter time period is being used because odour is perceived quickly. This is widely supported in the scientific literature. (WHO, Air Quality Guidelines for Europe, 2000; AIHA, Odor Thresholds for Chemicals with Established Occupational Health Standards, 2013). The Ambient Air Quality Objectives and Guidelines document has been updated to include information on odour-based guidelines. • As stated in the guideline document, the WHO H_2S number was used as a surrogate for this TRS guideline. We understand the amount of H_2S in the mixture will vary depending on the emission source; however, the proposed number is for the total mixture. The analyzer will measure the TRS compounds no matter their proportion. • The location of ambient monitoring sites is based on the monitoring objective and providing the best monitoring results to meet the needs of the monitoring program. It is up to airsheds and industry along with EPA and Alberta Energy Regulator, when necessary, to evaluate the siting of their monitoring stations following requirements in the AMD. TRS analyzers are already in place across the province where there are sulphur-based emissions.

	Comments	Response
14	Two industrial associations recommend that the definitions in the Air Monitoring Directive be updated to clearly distinguish the difference between an Ambient Air Quality Objective and an Ambient Air Quality Guideline. EPA should recognize that an objective for H_2S already exists and is already appropriate for odour management for this substance. The Industrial Association therefore recommends that H_2S be specifically excluded from the suite of reduced sulphur compounds in the proposed TRS guideline.	Differentiating between objectives and guidelines has been noted as a beneficial update to the AMD. Chapter 9 Reporting of the AMD is currently under review and will be posted for comment when a draft is ready. When reviewing the H_2S objective, the CASA Project Team came to the consensus agreement that the current H_2S objectives were not adequate to address odour, so the TRS guideline was developed. It is not practical to exclude H_2S from TRS for the purpose of a new guidelines as it would greatly increase the cost and work to industry and airsheds. TRS monitors include H_2S, so to remove of H_2S would require co-located monitoring of TRS and H_2S, then the difference between the readings calculated to determine a TRS without H_2S concentration.
15	Industrial association: We are further concerned that, in the absence of clear language to the contrary, the creation of a TRS guideline that is inadequately distinguished from an objective will cause modelled TRS to become a standard approval condition for EPEA approved facilities.	Guidelines are not automatically required to be modelled for an approval, as is the case for objectives. The need to model guidelines as part of an approval application is determined by the director on a case-by-case basis. When there is the potential for an issue to arise for a pollutant with a guideline the director may require additional information regarding the pollutant. The Ambient Air Quality Objectives and Guidelines document was updated to provide more information on how objectives and guidelines are used.
16	Is the primary purpose of the proposed 5 ppb(v) TRS objective to apply it in air quality models as a standard to be achieved? This would be inappropriate for a number of reasons. Air quality models, as a general rule, over-predict. AEP modelling rules generally exacerbate the propensity for models to over-predict by mandating modelling at maximum emissions from all site sources, i.e. low-probability events. Furthermore, AEP's modelling policy effectively eliminates the ability of approval writers to apply best professional judgement and critical thinking skills to readings above the objective. This is inappropriate for a subjective parameter like odour.	This is a guideline not an objective. The purpose of the TRS guidelines is provide a quantitative measure or indicator to compare against odour complaints received, determine if an odour issue might exist and determine if management is warranted. Modelling against the TRS guideline may be needed if required by the director as part of an approval application or renewal. The guidance document for modelling interpretation Using ambient air quality objectives in industrial dispersion modelling and individual industrial site monitoring is being updated based on stakeholder input. This will include guidance on interpreting modelling for odour-based guidelines. Interim guidance on application of the TRS guideline has been developed and will be provided to regulatory staff to ensure consistent application.

	Comments	Response
17	• Will airsheds be expected to submit 30-minute averaged data to the air data warehouse? Currently, airsheds submit one-hour data to the Air Data Warehouse. The airshed is assuming EPA will require airsheds to submit the 30-minute data to the Warehouse and requires EPA to confirm this assumption. This will require the creation of new XML files to submit 30-minute averaged data to the air data warehouse. • Does the Alberta Ambient Air Quality Objective for H_2S apply to TRS? The airshed made the conservative decision to install TRS analyzers at all community stations, rather than H_2S analyzers, and report the TRS concentrations against the objective for H_2S, as no objective exists for TRS. There are also two industry compliance stations in the airshed that have TRS monitoring as a requirement of their EPEA approval. If the proposed guideline for TRS is adopted, will the airshed be expected to continue to apply the H_2S Objective to TRS or only apply the TRS guideline? • How will EPA communicate the proposed TRS guideline with respect to Air Quality Health Index (AQHI) risk values? There is a risk of confusion and loss of confidence from stakeholders and community members when an exceedance of the proposed TRS guideline occurs and the AQHI risk values remain low, since the AQHI is not calculated using ambient concentrations of TRS. How will EPA communicate the proposed TRS guideline to stakeholders and community members? Is community-based messaging going to be used each time the proposed TRS guideline is exceeded?	• Airsheds and industry would have to submit 30-minute averaged data for TRS to the Air Data Warehouse (XML file submission). There is no need to submit 30-minute averages for other parameters. • The TRS guideline will be used for TRS monitoring, while the H_2S objective is used for H_2S monitoring. The H_2S objective does not apply to TRS unless there is a specific requirement or agreement in place (e.g., through an EPEA approval). With respect to the industry compliance stations, the requirements in their approval would have to be adhered to and any questions on these stations would have to be addressed by the approvals coordinator. • The AQHI currently uses the H_2S objective of 10 ppb as an odour and visibility cut-point for both TRS and H_2S. This triggers an odour and visibility message only and does not modify the AQHI value or risk level in any way. The AQHI could be updated in the future to take into account the TRS guideline for the odour messaging. Currently, the TRS guideline will not be used as part of AQHI reporting in Alberta.
18	Given the very conservative assumptions and predictive nature of air models, a company notes that exceedances of this new TRS guideline will likely be predicted in modelling of the company's emissions at the 'fenceline'. the company notes that a prediction in the model does not necessarily mean the company's actual TRS emission would exceed site-specific approval limits or would result in an impact on the environment (including having an impact on adjacent residents or members of the public). The facility must be viewed in context when EPA reviews hypothetical modelling data that is very conservative and errs on the side of identifying potential exceedances of a guideline. These models do not account for factors such as the company's remote location and extremely rare occurrences of odour complaints from the public.	Air quality models are designed to be conservative to provide a regulatory safeguard on environmental impacts. However, a modelled exceedance within an approval application does not automatically lead to a failed application but rather provides information to the approval director that will be taken into consideration as part of their assessment of the application. The guidance document for modelling interpretation, Using ambient air quality objectives in industrial dispersion modelling and individual industrial site monitoring ,is being updated based on stakeholder input. This will include guidance on interpreting modelling for odour-based guidelines. Interim guidance on application of the TRS guideline has been developed and will be provided to regulatory staff to support consistent application.

NOTE:

An electronic reporting protocol for values above the TRS guideline was initiated to address concerns about the additional reporting burden that the new guideline would incur for some airsheds/facilities.

This electronic reporting protocol applies only to submission of electronic reports for values above the TRS guideline, not any other objective or guideline.

All other procedures or requirements for reporting of exceedances and releases have not changed.

For the purposes of this response document "reporter" is used for the person(s) reporting the values above the TRS guideline.

TABLE 2 RESPONSES TO THE FEEDBACK ON THE PROTOCOL FOR ELECTRONIC REPORTING OF VALUES ABOVE THE TOTAL REDUCED SULPHUR (TRS) GUIDELINE

	Comments	Response
1	Accountability for reporting the TRS Ambient Air Quality Guideline exceedances should be with the airshed.	If the airshed conducts the monitoring, they would put this electronic reporting protocol into place unless another arrangement is agreed to between airshed-facility.
2	There were questions regarding requesting waiver of the 7-day letter: • When/what frequency does it have to be requested? • How is confirmation of the waiver provided? • Who has the responsibility for the request? There may not be enough info to decide to request a waiver.	The electronic reporting protocol has been amended to remove reference to 7-day letters and states rather that reporting under the electronic reporting protocol cannot fulfill any release reporting requirements. Release reporting is required in accordance with section 110 of EPEA and/or under an approval. Section 111 of EPEA applies in those circumstances to require a 7-day written report.
3	Suggested that requirement for 7-day written report be removed.	See Comment 2 and the response.
4	Wind speed and direction only collected hourly – can they report hourly ws and wd for the hour of the exceedance?	Options have been provided for reporting 30 minute or 1-hour wind speed. Refer to the electronic reporting protocol document for details.
5	Concerns re distinction between objectives and guidelines in the Air Monitoring Directive (AMD) not being clear. If both objectives and guidelines trigger immediate reporting, it is unclear to the regulated community how these two differ.	The AMD treats objectives and guidelines the same for the requirements in the AMD. This will be amended when AMD Chapter 9 is revised. The AMD does not speak to the use of objectives and guidelines, rather it outlines monitoring and reporting requirements. The Ambient Air Quality Objectives and Guidelines summary document has been updated to provide more information how objectives and guidelines are used. Immediate reporting provides information that may be required for investigations into complaints, etc.
6	Immediate reporting of exceedances is warranted only if the exceedance is correlated with identified odour impacts/odour complaints.	Immediate reporting of exceedances is an AMD requirement. Correlations of values above the guideline with odour complaints can only be made if the data is available when the odour complaints are made. The highest number of air quality complaints received in by the department are for odour. The public expects their concerns to be investigated and addressed. Having immediate access to the reports helps expedite any investigations made as a result of the received complaint(s).
7	In most cases, exceedances of the guideline will not correlate with odour complaints. What is meant by management actions?	If this is the case, odour management actions may not be required. Management action, when warranted, would be based on the frequency and duration of odour events and could include a management plan developed with relevant stakeholders.
8	How will the data be shared?	Automated reports will be emailed from the data acquisition system to an EPA mailbox that will only be accessible by staff. The information is not entered into the EDGE/compliance system. As per the AMD, the 30-minute TRS data will be submitted to the Alberta Air Data Warehouse.

	Comments	Response
9	What are the significant figures for reporting?	The AMD outlines the significant figures for reporting. Please review the requirements in the AMD Chapter 9.
10	Concerns were expressed about the optics to the public of increased number of exceedances because of the short averaging period.	The term “exceedance” has been removed from the electronic reporting protocol and replaced by “values above the guideline”. Electronically reported data will not be publicly available, however ambient data is reported as per the AMD on monthly basis to the Air Data Warehouse. Industrial ambient data is not currently publicly available but will be in future.
11	Conduct a review of the Release Reporting Regulation, in consultation with industry, with a specific focus on the ongoing value of seven-day written reports and associated waivers.	Alberta policies and regulations are reviewed and updated on a regular basis. The Release Reporting Regulation was amended in June 2021. However, there were no changes to the requirement to submit a seven-day written report. This EPEA requirement ensures accountability for releases or events that have the potential to impact the environment or human health.
12	The use of a 30-minute averaging period for TRS would be inconsistent with the one-hour averaging period currently used for all monitoring parameters at the ambient station.	The averaging period was set for 30-minutes as this is a better indicator for odour than a one-hour averaging period. Some jurisdictions have 10-minute TRS objectives/guidelines. TRS is currently the only sub-hourly guideline or objective, however there could be others in the future.
13	In modelling for new project proposals or during operating approval renewals, EPA indicated that the TRS guideline may be modelled as determined by the director. EPA should specify in the Alberta Ambient Air Quality Objectives and Guidelines Summary that the modelling of guidelines is not required.	If emissions of a substance from a facility could result in adverse effects to the surrounding environment (whether air quality or odour-based, and whether there is an objective or guideline in place), the director may require that modelling be done for that substance. This is a decision of the director.
14	It would require time and resources to enact an auto email report within our system (we estimate putting this mechanism in place would take until the end of 2021)	Experts on data acquisition systems advised that setting up an auto-email from the data acquisition system is not onerous and should be possible by personnel currently in place for conducting ambient air monitoring and equipment maintenance. Once the new guideline is posted it will take effect 60 days later, then there is an additional 90 days before reporting is required. This provides five months to prepare for the electronic reporting protocol
15	The guideline is not clear on how the EPA reference number for the 7-day letter will be provided for the e-mail submissions that do not request waiver of the 7-day written reporting. Please confirm how the EPA reference number will be provided to the reporting facility.	Reference to 7-day letters have been removed from the electronic reporting protocol. There is no automatic 7-day letter associated with automated reporting of values above the TRS guideline. Original procedures for reporting releases remain, as per the Release Reporting Regulation and Guide to Release Reporting.
16	If the intent of this guideline is for odour management that is not a health concern, then the reason that the reference to sections 110 and 111 of EPEA is to clarify that the new TRS guideline does not replace the requirement for a facility to report on a release if they have to as part of conditions of the approval.	References to EPEA and 7-day letters have been removed from the electronic reporting protocol. It now states that reporting under the electronic reporting protocol cannot be used to fulfill release reporting requirements. Release reporting is required in accordance with section 110 of EPEA and/or under an approval. Section 111 of EPEA applies in those circumstances to require a 7-day written report.
17	We support the requirement that exceedances of guidelines be reported the same as objectives. For the TRS guideline, this will ensure that elevated TRS levels, i.e. levels that are likely to result in odours, are noted and that some follow-up examination is required. However, as members of an airshed organization, we also want the reporting approach to be practical and doable approach and to be an effective and useful odour management tool.	The updated Ambient Air Quality Objectives and Guidelines document provides more clarity on how guidelines and objectives are different and how they are used. A separate section and table for odour guidelines was added. The TRS guidelines will not be reported through the compliance system as objectives are. Rather an electronic reporting protocol was developed to reduce reporting burden.

	Comments	Response
18	We propose monthly reporting for one year and for EPA to collaborate with the concerned community in that time on a long-term plan to mitigate the issue based on data.	EPA believes reporting monthly (manually) into a new rolled up report will take more resources than electronic reporting directly from the data acquisition system by email. The purpose of immediate reporting is so regulatory staff can refer to and use the data in their review of odour complaints, as they come it. This cannot be done a month later. Once the data acquisition system is set up to send automated emails for values above the TRS guideline, it should be hands-off.
19	If it is found after QA/QC (e.g. baseline correction) that there was no exceedance, how is the exceedance recalled?	Additional text has been added to the electronic reporting protocol to provide the procedure for recalling reported data.