

ODOR CONTROL PLAN

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Date: 10/10/2023

1. Approach

Purpose of this Plan is Develop a Comprehensive Odor Control Strategy for the Montville Gateway Site.

2. Tier 1: Prevention

Monitor and Manage Material in Onsite Bins to Cover Odorous Materials with less Odorous Materials to the extent Practicable.

3. Tier 2: Mitigation

A. Cover Dredged Material Piles:

- Use heavy-duty, UV-resistant, and impermeable tarps designed for odor control.
- Secure covers using durable fastening methods (ratchet straps, bungee cords).
- Schedule regular inspections:

C. Inspect covers for tears, gaps, or damage

D. Ensure proper anchoring and sealing

E. Repair or replace covers as needed

B. Apply Odor Control Foam:

- Use biodegradable and environmentally safe foam products
- Apply foam evenly to the entire surface of stockpiles
- Adjust foam application rates as necessary
- Maintain records of foam application, including location, date, and quantity used

4. Monitoring

Investigate Unusual Odor Occurrences and Conduct root cause analysis for any unexpected odor events. Implement corrective actions, such as increased foam application or enhanced cover measures. Monitor weather conditions and windspeed / direction with an onsite mounted windsock.

5. Reporting

- A. Document any odor exceedances or unusual incidents in the onsite field logbook.
- B. Maintain a detailed log of all odor-related incidents, responses, and corrective actions taken
- C. Develop a standardized format for incident reporting and record-keeping

6. Evaluation and Adjustments

A. Conduct periodic reviews of odor control effectiveness:

- Analyze data to assess trends and potential improvements
- Perform quarterly performance assessments

B. Modify control measures as necessary to ensure compliance and minimize community impact:

- Adjust foam application rates
- Modify tarp coverings
- Update action thresholds

C. Periodically engage an independent third party to conduct audits and provide recommendations for improvements.

8. Training

A. Provide comprehensive training to all personnel involved in odor control:

- Proper operation and maintenance of monitoring equipment
 - Full understanding of regulatory requirements
 - Proficiency in emergency response protocols
 - Detailed record-keeping procedures
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