

Complaints Task Group Final Report



Prepared by the
Complaints Task Group
for the
Odour Management Team

May 2015

Important Notice.....	iii
Acknowledgements	iii
List of Acronyms.....	iii
Complaints Task Group Members.....	iv

EXECUTIVE SUMMARY V

1. INTRODUCTION.....	6
1.1 Vision and Intended Audience	7
2. OVERVIEW OF TASKS.....	7
3. METHODOLOGY.....	9
3.1 Step One: Background Report.....	9
3.2 Step Two: Cross-jurisdictional Review	10
3.3 Step Three: Develop Tools.....	10
3.3.1 Determination of Appropriate Tools	10
3.3.2 Guidance Booklet Development.....	12
3.4 Pilot Testing	12
4. ADVICE ON EDUCATION/COMMUNICATION/AWARENESS.....	13
5. ADVICE ON CONTINUOUS IMPROVEMENT.....	14
6. LINKS TO OTHER TASK GROUPS.....	14
7. LESSONS LEARNED/ADVICE	15
8. RECOMMENDATIONS.....	15
9. APPENDIX I: ALBERTA ODOUR COMPLAINTS OVERVIEW
10. APPENDIX II: ODOUR COMPLAINTS IN YOUR AREA: A GUIDE FOR DEVELOPING AN ODOUR COMPLAINT PROCESS.....
11. APPENDIX III: ODOUR COMPLAINT REFERRAL PROCESS.....

Important Notice

The content contained in this report is being provided to the Odour Management Team (OMT) for their consideration as they develop the ‘Good Practice Guide’ as well as their Final Report. The task group recognizes that the content may or may not be fully included in the final versions of these documents which will be submitted to the CASA Board of Directors for their approval.

Acknowledgements

The Complaints Task Group would like to thank all current and past members for their hard work and dedication over the life of the group.

List of Acronyms

AAC	Alberta Airshed Council
AAMDC	Alberta Association of Municipal Districts and Counties
AER	Alberta Energy Regulator
AESRD	Alberta Environment and Sustainable Resource Development
AHS	Alberta Health Services
AUMA	Alberta Urban Municipalities Association
CASA	Clean Air Strategic Alliance
CIC	Coordination and Information Center
CNRL	Canadian Natural Resources Limited
DNCG	Diluted Non-Condensable Gas
EPH	Environmental Public Health
EWMC	Edmonton Waste Management Center
FOIP	Freedom of Information and Protection of Privacy
GPG	Good Practice Guide
H ₂ S	Hydrogen sulphide
LICA	Lakeland Industry and Community Association
LVHC	Low Volume High Concentration
NCG	Non-Condensable Gas
NRCB	Natural Resources Conservation Board
OIPC	Office of the Information and Privacy Commissioner
OMT	Odour Management Team
PIPA	Personal Information Protection Act
RFP	Request for Proposal

Complaints Task Group Members

Name	Organization
Ron Axelson	Intensive Livestock Working Group
Ann Baran	Southern Alberta Group for the Environment
Michael Bisaga	Lakeland Industry and Community Association (LICA)
Roxane Bretzlaff	Canadian Natural Resources Ltd.
Keith Denman	Alberta Environment and Sustainable Resource Development
Francisco Echegaray	Natural Resources Conservation Board
Jennifer Fowler	Hinton Pulp a Division of West Fraser Mills Ltd.
Zaher Hashisho	Alberta Health
Joseph Hnatiuk	Canadian Society of Environmental Biologists
Carolyn Kolebaba	Alberta Association of Municipal Districts & Counties
Jim Lapp	City of Edmonton/Solid Waste Association of North America
Dalene Meier	Alberta Energy Regulator
Tanya Moskal-Hébert	Alberta Agriculture and Rural Development
Ludmilla Rodriguez	Alberta Health Services
Merry Turtiak	Alberta Health
Amanda Stuparyk	Clean Air Strategic Alliance (CASA)

Former Members

Name	Organization
Sandi Jones	Alberta Agriculture and Rural Development
Celeste Dempster	Clean Air Strategic Alliance (CASA)

Executive Summary

The Complaints Task Group was formed in November 2013 to carry out the work listed under “Complaints” in the Odour Management Team (OMT) Project Charter (March 2013).

The Charter outlines two objectives for the ‘Complaints’ work:

1. *To effectively manage odour complaints.*
2. *To monitor long-term trends in odour complaints.*

The task group focused its time and effort on developing deliverables that would provide non-experts that receive odour complaints (such as employees at municipalities and industry) with appropriate tools to manage the complaints or refer callers to applicable agencies to address their complaint.

The task group agreed they would first develop an understanding of the current mechanism(s) in place to manage odour complaints by inviting multiple agencies to present their complaints management processes. They contracted an editor to compile the process information that formed a backgrounder report on odour complaint management in Alberta titled: *Alberta Odour Complaints Overview*.

The task group mutually agreed they would not have the time or resources to pursue the monitoring of long term trends in odour complaints (objective #2) and would provide advice to the OMT in regard to this piece for future work. Ultimately the group focused their remaining time on developing guidance for a comprehensive complaints management process, including information on communications and information exchange.

The group worked with a consultant to develop a complaints management process guidance document including sample tools an organization can use and customize to individual processes. This guidance document titled: *Odour Complaints in Your Area: A Guide for Developing an Odour Complaint Process*, includes a referral Reference Guide, Decision Tree, Call Log, a Complaints Form, and a Public Handout. The referral decision tree was piloted with a number of agencies but due to limited time available and lack of calls during the pilot period, feedback was limited.

The final work for the group was to develop their task group final report (*this report*) to outline their work and deliverables, discuss areas of advice for the distribution of the group’s deliverables, and provide advice for future work in odour complaints.

The task group met their timelines and came in under their allocated budget through contract management with the consultant and in-kind work from all members on the deliverables.

1. Introduction

In January 2013, the Odour Management Team (OMT) was formed to design a process that would assist various stakeholders to engage in a focused discussion directed at advancing odour management in Alberta. The work of this team was divided into seven cross-cutting topics as outlined in the Odour Management Project Charter (March 2013): Complaints, Odour Assessment, Prevention/Mitigation, Enforcement/Role of Regulation, Health, Education/Communication/Awareness, and Continuous Improvement. The OMT prioritized three areas to begin work: complaints, odour assessment, and health.

The Project Charter outlines two objective for the ‘Complaints’ work:

1. *To effectively manage odour complaints.*
2. *To monitor long-term trends in odour complaints.*

The OMT agreed that the work should apply to all sectors, that no individual sector is meant to be singled out, and that while some best practices could be sector specific, the task groups should focus on creating processes that provide a consistent approach for managing odour in Alberta. It was recognized that in some instances, all reasonable efforts can be made to manage a source of odour, but complete elimination may not be possible.

The Complaints Task Group was formed in November 2013 to carry out the work listed under “Complaints” in the Project Charter. The task group established ground rules for how they would work together. Their basic rules of procedure and behaviour included coming to meetings prepared and setting specific objectives; keeping discussions focused on the set goals and outcomes; being considerate of time and honouring commitments; respecting the interests of others; expressing concerns; and contributing to an environment where members can be creative and take risks. Each deliverable of the Complaints Task Group was achieved through consensus agreement of the whole group.

To meet their objectives the Complaints task group:

- Met 18 times,
- Spent over 1150 hours in and between meetings developing and reviewing deliverables, and,
- Came in under their allocated budget from the OMT.

This final report outlines the work of the task group, describes their deliverables, and provides advice to the OMT for consideration and inclusion into the Good Practice Guide (GPG).

Reflecting on their work, the task group recognized that general issues of odour management and, in particular complaints, were addressed at a high level in order to develop guidance and processes for a variety of users. All members recognized that the complaints management process can be part of larger, more complex issues, including non-point sources and cumulative effects, but that these issues could not be addressed by this task group due to limited time and resources.

1.1 Vision and Intended Audience

The vision for the Complaints task group states that: *“Alberta regulatory agencies, facility operators and municipalities all may receive complaints related to odour concerns, and a great deal of time and resources are expended by Alberta’s regulatory agencies in addressing odour-related concerns. When odour issues are not satisfactorily addressed, it may result in more protracted issues where complainants and proponents are more polarized and entrenched.”*

The group considered their main audience for the work and decided that the focus of the deliverables would be to provide non-experts that handle odour complaints, such as employees at municipalities and industries, with the tools they need to handle the complaints themselves or to refer the caller to the appropriate agency. The intended audience for the complaints process background report was internal to the task group and OMT.

2. Overview of tasks

The Project Charter outlines two objectives for the ‘Complaints’ task group:

1. *To effectively manage odour complaints.*
 - Understand the current mechanism(s) in place to manage odour complaints (for example: where are complaints coming from, who received the complaint, what information was recorded, how the information was recorded, how the complaint was resolved, what mechanisms for feedback to complainant were used).
 - Clarify roles and responsibilities for responding to odour complaints.
 - Develop a predictable, consistent, timely, step-wise, comprehensive process to document, investigate and address odour complaints. The process will incorporate the interests of all parties, be applicable to any odour incidence and include a clear process flow and guidance for decision-making.
 - Develop a mechanism for the complainant and the complaint manager to communicate throughout the process including information exchange at first contact and communicating results at the end of the process.
 - Make information available about the response to odour complaints.
 - Consider the role of odour assessment in responding to complaints.
2. *To monitor long-term trends in odour complaints.*

The Project Charter outlines potential outcomes or deliverables for the task group that included the following:

- A process to document, investigate and address odour complaints that incorporates the interests of all parties and which incorporates measurement and assessment tools.
- A graphic representation(s) that clearly outlines the process (examples include decision tree, process map, flow charts).
- Guidance for telephone operators/respondents responding to complaints.
- Guidance for regulators and complainants including roles and responsibilities and coordination of the various aspects of the complaints management system.

The table 1 below outlines the task groups’ main deliverables that were developed to meet the groups’ objectives.

Task Group Deliverables	Completion Status and Details
Understand the current mechanism(s) in place to manage odour complaints.	Complete. <ul style="list-style-type: none"> – The task group received presentations and discussions from various agencies utilizing a complaints process in Alberta and developed an informational report reviewing odour complaint management. See Appendix I for the backgrounder report titled: <i>Alberta Odour Complaints Overview</i>.
Develop a complaints management process including information on communications and information exchange and roles and responsibilities for responding to odour complaints.	Complete. <ul style="list-style-type: none"> – The task group worked with a consultant to develop a complaints management process guidance document that includes a variety of customizable tools for organizations to use to develop a complaints process. See Appendix II for the guide titled: <i>Odour Complaints in Your Area: A Guide for Developing an Odour Complaint Process</i>. – The task group also provided a presentation to the OMT summarizing their work.
Monitor long term trends in odour complaints.	Not complete. <ul style="list-style-type: none"> – This is a potentially valuable piece of work but the task group agreed that they did not have time or resources to complete it and have provided advice to the OMT for future work.

Table 1: Complaints Task Group Workplan Deliverables.

The Task Group has completed the main objectives required for its deliverables, but did make two modifications from their original workplan (steps are outlined in Section 3). The task group made a decision not to proceed with a thorough cross jurisdictional review that was considered at the start of the process, as they felt that information gathered from a third-party consultant review and the Alberta organizations fulfilled their informational requirements. Based on the information gathered by the task group, they worked with a consultant to prepare an overview of existing practices in Alberta, and gathered information on specific topics such as repeat callers to inform the rest of their work.

The group did not pursue a province-wide tracking system to monitor long term trends in odour complaints. There is currently some data available for calls that enter through the regulatory system but there is no system in place to capture the information for calls that are made to other organizations, including municipalities and industry. It was recognized that there could be value in this information, but the collection and review of data would be time-consuming and the group were unable to commit resources for that piece. The task group members agreed to provide this advice to the OMT for future work.

3. Methodology

The Complaints Task Group workplan outlined steps for the progression of work and associated deliverables which are discussed in the next three sections.

3.1 Step One: Background Report

The first step was for the task group to develop a background report that described the current odour complaints and response landscape in Alberta. This information gathering focused on agencies that previously or currently receive and respond to complaints. This information could also be used to identify gaps/strengths in the current landscape. The group discussed including input from complainants on the effectiveness of complaints response to make use of any work that has already been done in this area.

The task group brainstormed and requested presentations from various agencies within Alberta that have existing processes for handling odour complaints. The group developed 12 questions for the agencies to address in their presentations (see Appendix I of the backgrounder for a listing of questions). They held a full-day workshop and additional meetings to hear presentations and compile information that formed their background information document.

The Complaints Task Group would like to acknowledge and thank the following agencies that presented information on their complaints management processes from their respective organizations:

1. Alberta Airsheds Council (AAC)
2. Alberta Association of Municipal Districts and Counties (AAMDC)
3. Alberta Energy Regulator (AER)
4. Alberta Environment and Sustainable Resource Development (AESRD)
5. Edmonton Waste Management Centre (EWMC)
6. Alberta Health Services (Environmental Public Health (EPH))
7. Hinton Pulp a Division of West Fraser Mills Ltd.
8. Natural Resources Conservation Board (NRCB)
9. Oil and Gas (CNRL)
10. Transportation (Altex Energy)

The task group then compiled all the information in order to compare the different complaints processes, identify strengths and weaknesses, and understand how the processes overlap and interact with each other.

They created an outline that formed their background information report to focus on three areas of investigation:

1. A general understanding of the odour complaint process including where different complaint calls are received, number and type of complaints, and current roles and responsibilities.
2. A complaints response overview including how complaints are currently handled by different agencies, (for example: Is a script used? Is there a link to odour assessment? What information is recorded?), what mechanisms are used to keep complainants informed after making a complaint, feedback mechanisms to evaluate responses, and the effectiveness of complaint responses.

3. Tracking mechanisms used, to track complaints and how agencies share information.

The group contracted an editor to compile the background document from the information received and outline created by the group. Once the background report was finalized, the group analyzed the information to identify strengths and gaps in the current odour complaint landscape, including common themes and unique approaches. This discussion was used to inform step 3 of the workplan (i.e. what tools should be developed).

3.2 Step Two: Cross-jurisdictional Review

Step two required the task group to conduct a cross-jurisdictional review of best practices outside Alberta related to complaint response and tracking mechanisms. They were directed to take advantage of existing research as much as possible and consider application in the Alberta context, rather than conduct original research.

The task group located and reviewed an existing report developed by a third party consultant and used this as a basis for a cross-jurisdictional review as it contained information from several other jurisdictions (*Odour Management in British Columbia: Review and Recommendations Final Report*, March 2005, RWDI AIR Inc.). The information was comprehensive and included processes from various jurisdictions. The report Section 2.8 - Complaint Criteria, cites complaints processes that were reviewed and used in the United States (Idaho, Minnesota, North and South Carolina, Texas, Colorado, Missouri), New South Wales, New Zealand, Northern Ireland, and the United Kingdom.

The task group made a consensus decision to utilize all the information that was gathered to that point as their basis to create useable tools in their final step. The task group focused their remaining time on creating tools for organizations to develop or enhance their complaints management processes.

3.3 Step Three: Develop Tools

In their final step, the task group used their work from steps 1 and 2 to develop usable tools, including recommendations relating to ownership and implementation. The group began by categorizing themes and breaking those down into a prioritization matrix that allowed them to classify areas of primary (short-term, high consequence) and secondary work (long-term, high/low consequence), as shown in Table 2 below.

3.3.1 Determination of Appropriate Tools

The task group focused their remaining work on their listing of primary areas to create products (such as tools, advice, and guidance), and in the secondary areas of work around discussing recommendations (such as advice for future work) that would be included within OMT deliverables.

Primary Areas of Work	Secondary Areas of Work
<ul style="list-style-type: none"> – Caller experience – Training/attitude of telephone operators 	<ul style="list-style-type: none"> – Data analysis – Awareness of complex issues

<ul style="list-style-type: none"> - Who are you going to call - Initial response time - Data collection - Common language - Investigation response - Repeat callers 	<ul style="list-style-type: none"> - Sharing information between agencies - Area specific information (“hot spots”) - Contact options
--	--

Table 2: Complaints Task Group prioritization matrix.

The task group began their discussion by reviewing the recommendations from their workplan that included the following 4 targeted areas:

1. Tools for handling complaint response that will assist responders.
2. Tools to support the follow-up process after a complaint is received including response and closure procedures, tracking and communications, and unique situations including repeat callers.
3. Tools that focus on tracking mechanisms including a focus on long-term provincial scale tracking of trends.
4. Tools that easily illustrate how complaints are received, documented and responded to in Alberta that highlight and share good processes and strengths.
 - o Examples of potential tools include: scripts, decision tree, a dedicated telephone line, clarification of role of person who receives complaint, sharing odour information from respondent to complainant, graphics or infographics, flow charts.

The group wanted to ensure the most important target areas were being addressed by their work. As they progressed through the above noted recommendations, the scope of the task group changed to focus on developing comprehensive guidance for developing a complaints process. Therefore, recommendations 3 and 4 were not completely addressed by the group’s final deliverables.

The first tool the task group developed was a detailed 1-page decision tree (plus any explanatory information) directed at government and industry, with a simplified version of the tree that can be shared by government and industry with the public. The decision tree is generic, so industry can customize it for their particular location.

The decision tree allows operators to quickly triage calls and direct callers to the most appropriate agency using a standardized approach. This will help decrease the number of times a caller is shuffled around to multiple agencies in order to lodge a complaint. This will also help to reduce caller frustration. The goal of this approach is to increase caller satisfaction with the process of registering a complaint.

The task group also developed a comprehensive complaints process guidance booklet including minimum requirements and good practices around data collection, investigation response, and initial response times. It was agreed that the booklet should have usable, customizable form(s) and handouts.

The task group created an overall vision for the 'Booklet shown in Table 3 below.

Content	Style
<ul style="list-style-type: none"> – Is about a process, not resolution of an odour issue (managing expectations) – Focuses on the front-end process rather than solving odour issues – Information could be used to design a user/industry specific process – All information is in one place – Focus on what to do (vs what not to do) – Helping to fill 'gaps' – Combination of “quick sheets” (simple – for those with minimal experience) and contextual information (additional information for those who already have some experience) 	<ul style="list-style-type: none"> – Readable, useful, customizable – Written for non-experts – Uses written material and diagrams – Information should be quick and easy

Table 3: Complaints Task Group guidance booklet design.

3.3.2 Guidance Booklet Development

The task group created a comprehensive RFP that outlined the main requirements for their work and contracted an editor/communications specialist utilizing the task group’s vision and guidance to develop a guide and set of tools that would assist with organizations’ complaints processes.

Ultimately, the task group created a customizable suite of tools that can be used to effectively manage odour complaints. The guidance booklet contains a decision tree and call log that will assist call operators to refer callers to appropriate agencies with a reference guide, a comprehensive ‘data collection’ form, and a public handout for organizations to customize for their own processes.

3.4 Pilot Testing

During early development of the decision tree tool, the task group knew the best way to test its usability was to conduct a pilot test. This would ensure the tool met their objectives, which were to provide telephone operators an easy to follow method to direct a caller to the most appropriate agency/group as efficiently as possible, and to provide guidance to elicit appropriate information from callers that will allow the operator to effectively re-direct the call (i.e. to help a non-expert in odour speak to another non-expert in odour about a technical subject).

The task group wanted to test the decision tree with actual telephone operators and use any feedback to make adjustments. They identified operators from different groups based on their network of contacts and requested that the consultant conduct the testing.

The pilot test was designed to target two types of organizations:

1. Organizations that refer callers. These organizations were asked to: (a) Customize the decision tree, and (b) Use their customized decision tree. Feedback was requested on the customization process and their experience using the decision tree.

2. Organizations to whom callers are referred. These organizations were asked to review the decision tree and provide feedback on: (a) Whether the process outlined in the decision tree would direct callers to the correct organization, (b) Whether the decision tree asks the right questions to help direct callers and, (c) Any additional feedback based on their experience handling odour complaint calls.

Overall, responses to the guide and tools were positive, although limited. The short length of time (less than one month) to conduct the pilot testing as well as the time of year (low odour complaints = no calls to test on) was likely a contributing factor to the lack of response. The nature of some of the feedback suggested that the intended use of the decision tree and call log was not completely clear, i.e. as a referral process, opposed to an investigative process. Feedback was used to clarify the intent of the tools. The task group concluded that a more thorough pilot testing phase of the guidance document and tools would assist in the continuous improvement for their deliverables.

A document highlighting the pilot testing results can be found in Appendix III: *Odour Complaint Referral Process*.

4. Advice on Education/Communication/Awareness

The Project Charter outlines objectives for the Education/Communication/Awareness work area for the odour project: *to increase awareness and clarify expectations about odour and odour management in Alberta and describe its importance in air quality management and protection. And to increase the capacity of relevant multi-stakeholder groups (eg. industry associations, synergy groups, airshed zones, etc.) to engage in the management of odours in Alberta.*

The Complaints Task Group discussed areas of advice to the OMT as it would relate to the distribution of the groups' deliverables. The following areas were identified for the OMT to consider as they develop a communications and roll-out plan for the Good Practice Guide (GPG).

1. The task group has identified key audiences for the distribution of their guidance document and tools. The document was developed to provide non-experts that handle odour complaints, such as employees at municipalities and industries, with the tools they need to handle the complaints themselves or to refer the caller to the appropriate agency. The group highlights that the Public Handout (*Reporting Odours in Your Community*) should be broadly distributed – a likely target would be municipalities and applicable branches of government (AUMA, AAMDC) and other umbrella organizations (Synergy Alberta).
2. The task group has identified advice related to communications/education and outreach of the task groups' guidance document and tools.
 - The OMT should pursue umbrella organizations to communicate and assist in the distribution of the task groups' work.
 - The task group notes the importance of the roll-out plan in focusing on 'hot spots' for odour complaints.
3. The task group highlights that the OMT should pursue increasing the awareness of central contact telephone numbers for odour complaints like the CIC, as they do not have the

resources to do a large campaign. This may be initiated and contingent on an internal conversation with ESRD.

5. Advice on Continuous Improvement

The Project Charter outlines objectives for the Continuous Improvement area of the odour project including: *evaluating the implementation of a CASA best practices guide, fostering the continuous improvement of a CASA best practices guide, and encouraging continuous improvement at odour generating facilities.*

The Complaints Task Group discussed the following areas of advice to the OMT about future work for complaints and the groups' deliverables.

1. A province wide complaints framework review should occur within a 5-year timeframe to discuss the complaints process in Alberta and further areas of work.
 - Continuous improvement of the tools (decision tree/call log/complaint form) should be reviewed. The task group recommends the umbrella agencies that are provided their deliverables agree to an audit or review of the usage of the tools to allow for continuous improvement and updates.
2. The task group recommends further work be conducted on the advice, revised processes and tools for 'hot spots' in the province. Those are identified as areas where there are multiple calls and/or repeat callers. Organizations could further refine or provide additional overall guidance and tools for the complex nature of repeat callers to implement policies or protocols. The group notes they have provided helpful references within their guidance document on repeat callers (Appendix II of the guide).
 - The task group notes that the CIC would have information that is specific to areas throughout the province, but there should be a more formal process for distribution of these data.
3. The task group recommends future work include a province-wide information gathering system for odour complaints that allows for analysis and trending based on the information collected from the call logs and complaint forms from the organizations using the tool(s). There is value in the information to identify trends/major areas of concern and should be ongoing and on a long term basis. There is a need to have someone agree to house and conduct the work.
4. The task group acknowledges there should be continuous sharing of complaint-related information between groups/organizations. Part of the process of implementing a complaints system should be the sharing of information with other similar industries or with government.

6. Links to other task groups

In addition to the overall integrated nature of the seven topics of work, the Complaints Task Group identified linkages between their information and tools to support the complaints response process and the Health and Odour Assessment task groups.

The group considered the link that often a complainant will also report a health concern or issue when reporting an odour. They discussed with the Health task group how medical professionals could be included in the complaints process. It was concluded complainants should be referred to their doctor, public health or emergency (911); at no time should the personnel taking the complaint call make health related recommendations. This recommendation is reflected in the guidance document but the group recognizes the tools may be linked.

The use of common language to describe odour was identified as a gap, as well as what data needs to be collected and how it should be interpreted. The Complaints task group had discussions with the Assessment task group to see if any of their work would contribute to defining common language and how the data collected from the complainant during the initial contact contributes to the overall data collected as part of an odour investigation.

Early on in the project the Complaints task group identified a possible requirement for public consultation and engagement. The Odour Management Team discussed the feedback that was requested by the Complaints task group regarding input from complainants about their experiences and whether this type of input would be useful for other task groups and/or the broader work of the team. The group did not pursue public consultation as part of their deliverables.

7. Lessons learned/Advice

The task group discussed lessons learned for the OMT to consider in regard to their work on this topic, their task group final report, and their deliverables.

- The task group recommends their deliverables receive some graphic design. The task group notes their consultant was not asked to do graphic design on the deliverables as this could be addressed at a higher level for the GPG.
- Further pilot testing should be conducted on the tools and referral process. The testing should ensure there is sufficient time and an adequate number of participants. Since there is seasonality in odour complaints this should factor into the planning process for pilot testing.
- Future work could occur on odour management and complaints and could consider cumulative effects, both of odours and of facilities producing odours, and the associated complaints processes and information sharing.
- Future work should be undertaken to improve training for staff that take odour complaints. There could be consideration for information training sessions that discuss soft skills training.

8. Recommendations

The Complaints task group has the following recommendations for acceptance by the OMT.

Recommendation 1: Accept the Task Group's Guidance Document and Tools.

The task group recommends the OMT accept the complaints guidance document and associated tools for inclusion in the Good Practice Guide as a complete document.

Recommendation 2: Accept the Task Group's final report.

The task group recommends the OMT accept their final report with the advice and recommendations for consideration as the OMT develops their deliverables.

Recommendation 3: Disband the Complaints Task Group, after review of the GPG.

The task group recommends they have an opportunity to review their applicable sections within the Good Practice Guide, after which the group may be disbanded as their workplan will be complete.

Recommendation 4: Increase the profile of the Coordination and Information Centre (CIC).

The task group recommends the OMT establish a plan/resources to increase the awareness and profile of the CIC 1-800 contact number specifically around odour and odour complaints.

Appendix I: Alberta Odour Complaints Overview

Alberta Odour Complaints Overview

**prepared for
Clean Air Strategic Alliance
by Scott Rollans**

March 31, 2014

Table of Contents

Introduction	2
Section 1: Information overview, by question	4
Section 2: Information overview, by presenter	27
Section 3: Appendix—Forms and policies, by presenter	45

Introduction

Over the past few months, the Complaints Task Group (a subgroup of CASA's Odour Management Team) solicited presentations from regulatory agencies, facility operators, and municipalities that deal with odour complaints in Alberta.

The goal of this survey is to create a concise overview of the current mechanisms in place to manage odour complaints in our province. Where do odour complaints come from? Who receives the complaint, and what information do they collect? How do groups assess complaints, what steps do they take to resolve them, and how do they follow up with complainants?

Invitees were asked to organize their presentations around twelve questions from the working group:

1. How many odour complaints do you receive (weekly, monthly, annually) including the most frequent times of day, night and season?
2. How do you receive complaints? (e.g., by phone, via Twitter)
3. Who has the initial contact with the complainant and what are their qualifications? (e.g., who answers the telephone)
4. What information do you collect from the complainant?
 - What descriptors do you use to help categorize odours?
5. How do you determine the appropriate response to a complaint?
6. What tools are used to investigate complaints?
 - How do you assess odours (e.g., rotten eggs) during an investigation?
7. How do you document your process, including:
 - a. Information recorded from the complainant
 - b. Complaint investigation
 - c. Response to investigation and follow-up with complainant
8. Do you track complaint data? If so, how? (e.g., by number of complaints, source)
 - Do you conduct any analysis of complaint data? If so, who does the analysis?
9. Does your process require that you share complaint information with other agencies/partners? If so:
 - a. Which agencies/partners and what type of information?
 - b. How is this information shared?

CASA Odour Complaints Report

- c. Is FOIP an issue with respect to release of information and confidentiality?
10. What are the timelines associated with your process (from a complaint being received to final follow-up with complainant)?
 11. What lessons learned can you share about your process?
 12. Do you have any tools/policies/forms related to your process that you can share?

Report structure

This report consolidates the information presented to the Complaints Task Group, and organizes it in three main sections:

Section 1: An overview of the information, organized around the working group's twelve questions to presenters. Each question is followed by summaries from only those presentations that included pertinent information in that area.

Section 2: Another overview of the information, organized according to presenter.

Section 3: An appendix of supporting documents supplied by the presenters.

Section 1:

Information overview, by question

Question 1:

How many odour complaints do you receive (weekly, monthly, annually) including the most frequent times of day, night and season?

Not all respondents keep track of the number of odour complaints they receive. Only a few analyze complaints to find the most frequent times of day, or of year.

Alberta Airsheds Council (AAC) reported that airsheds have a relatively informal process for handling odour complaints. They reported that their members (nine airshed zones) each receive anywhere from 0–60 odour complaints per year.

Alberta Association of Municipal Districts and Counties (AAMDC) distributed a brief survey to its members, and 36 of 69 municipal districts and counties responded. Most AAMDC members rarely receive odour complaints—they cite numbers ranging from 20 per year to one odour complaint in the previous 12 years.

Alberta Energy Regulator (AER) received 373 odour complaints in 2010, 386 in 2011, 489 in 2012, and 388 in 2013. They do not break down their data by time of day or season.

Alberta Environment and Sustainable Resource Development (AESRD) received about 10,000 calls at its Coordination of Information Centre (CIC) in 2013, of which 519 were related to odour. In addition to the Natural Resources Conservation Board (NRCB) and the Alberta Energy Regulator (AER), which made their own presentations to CASA's odour working group, the CIC services the Alberta Environment Support and Emergency Response Team, Alberta Environment and Sustainable Resource Development, and Alberta Transportation.

Edmonton Waste Management Centre (EWMC) reported 783 odour complaints received citywide through the City of Edmonton's 311 service. Not all of these complaints relate to the EWMC or Goldbar Wastewater Plant. 46 percent of odour calls are in July and August, with 51 percent between 6 and 10 p.m.

Environmental Public Health (EPH) does not track the specific number of odour complaints (the term it uses is "service requests") it receives. Service requests include situations involving both indoor and outdoor air quality.

Hinton Pulp received 58 odour complaints in 2013, 96 in 2012, 58 in 2011, and 28 in 2010. Most complaints occur during the summer, when people are more likely to be outdoors and to have their windows open. They also occur mostly during normal waking hours.

Natural Resources Conservation Board (NRCB) reported receiving "hundreds of complaints each year." (They presented a bar graph indicating numbers between 200 and

CASA Odour Complaints Report

350 annually over the past five years.) NRCB receives its highest number of complaints in the spring and fall. Most complaints relate to odours from barns and lagoons, or from manure spreading.

Oil and gas sector — Conventional operations receive few odour complaints directly. Most complaints go directly to the Alberta Energy Regulator (AER; see above).

Transportation sector — Altex Energy occasionally receives one or two odour-related complaints, usually during loading; however, there's no regular pattern to their frequency. Some facilities receive daily complaints, while others have never received a complaint. The company also sometimes receives complaints when the facility is not operating.

Question 2:

How do you receive complaints? (e.g., by phone, via Twitter)

Phone calls remain by far the most common way odour complaints are received in Alberta. None of the presenters currently solicit complaints via Twitter. One organization has developed a web app, accessible by mobile devices, which enables users to report odours.

Alberta Airsheds Council (AAC) — Airshed zones receive complaints through a number of different methods:

- Website/email
- Hard copy/observation card reporting
- WBEA's Fort McMurray Odour Project web app (odoview.com/wbea/)
- Telephone
- Walk-ins

Alberta Association of Municipal Districts and Counties (AAMDC) did not specify how their members generally receive complaints.

Alberta Energy Regulator (AER) receives complaints via the Energy and Environmental 24-hour Response Line: 1-800-222-6514. This number connects callers to Alberta Transportation's **Co-ordination and Information Centre (CIC)**.

Alberta Environment and Sustainable Resource Development (AESRD) receives the vast majority of its complaints via the CIC's 1-800-222-6514 response line, but do receive about 15 emails per year from industry who are self-reporting. The same procedures apply to both calls and emails.

Edmonton Waste Management Centre (EWMC) — The City of Edmonton has a 311 hotline where residents can call to report odour complaints (along with any other concerns relating to the city, from potholes to the arena decision). The EWMC also receives some complaints by email, regular mail, and in person.

Environmental Public Health (EPH) receives some calls forwarded from Health Link Alberta. The EPH also receives direct calls, emails, and walk-ins, as well as referrals from other agencies and municipalities.

Hinton Pulp receives its odour complaints (which it calls "public inquiries") via its Main Gate phone number, which is staffed 24/7. It regularly advertises the number in both local papers.

Natural Resources Conservation Board (NRCB) — NRCB's 24-hour complaints line connects to a dedicated line in ESRD's **Co-ordination and Information Centre (CIC)**. Callers also sometimes contact an office or an inspector directly.

CASA Odour Complaints Report

Oil and gas sector — Odour complaints made directly to operators typically arrive by phone. Complaints may also be relayed to companies via AESRD.

Transportation sector (Altex Energy) — Altex has no formal complaint process. It receives complaints by phone and deals with them on a case-by-case basis.

Question 3:

Who has the initial contact with the complainant and what are their qualifications? (e.g., who answers the telephone)?

With well-educated, specially trained and experienced Compliance Officers, CIC (run by Alberta Transportation) services Alberta Environment Support and Emergency Response Team, the Natural Resources Conservation Board, the Alberta Energy Regulator, Alberta Environment and Sustainable Resource Development as well as Alberta Transportation. It is the province's most qualified call centre when it comes to handling odour complaints. Although some of the other presenters don't require specific qualifications for the people who receive complaints, most recognize the importance of training.

Alberta Airsheds Council (AAC) — The initial contact varies from zone to zone. A program manager, executive director, or somebody else in the administration may take a complaint. Board members or technical working group members may also provide informal responses.

Alberta Energy Regulator (AER) — A team of ten Compliance Officers, working in shifts, operates the CIC 24 hours a day. Compliance Officers are required to have a Bachelor of Science (preferably in chemistry or environment science) plus at least two years of related experience (or equivalent). They also receive about 18 months of on-the-job training.

Alberta Environment and Sustainable Resource Development (AESRD) operates the CIC (see AER response, above).

Edmonton Waste Management Centre (EWMC) — The initial contact is a general 311 operator. If an odour complaint relates to the EWMC, it is forwarded to assigned staff/consultants at the drainage branch, the EWMC, and Goldbar.

Environmental Public Health (EPH) — Calls received at Health Link Alberta are answered by trained nurses. At the EPH, receptionists are trained to collect basic information from callers before assigning the request to the appropriate PHI. PHIs also field direct calls.

Hinton Pulp — odour complaints are received by phone at the main gate. The employee who takes the call fills out a public inquiry form (see appendix) before redirecting the call elsewhere in the company for investigation and response.

Natural Resources Conservation Board (NRCB) — NRCB's calls are answered at the CIC (see above). Once the call sheet has been passed on to NRCB, the assigned inspector becomes the primary contact for the complaint.

Oil and gas sector — If an odour complaint does come in directly, the process is very informal. An administrator may take the call, or it could go through to a field staff

CASA Odour Complaints Report

member. If the call goes to an administrator, the information is recorded in a log book; otherwise, the complaint is simply dealt with as part of regular operations.

Some odour complaints go through the AESRD hotline at the CIC. Companies may also call the AESRD hotline proactively if they anticipate potential odour problems; for example, because of an emergency upset or a planned process.

Companies sometimes also call the AESRD hotline proactively if they anticipate potential odour problems; for example, because of an emergency upset or a planned process.

Transportation sector (Altex Energy) — The initial contact is the facility manager, who has 20 years in the transportation industry.

Question 4:

What information do you collect from the complainant?

- **What descriptors do you use to help categorize odours?**

All of the presenters collect basic information—names (if provided), location of the problem, description of the odour and its strength. Some presenters specifically categorize odours to help with complaint triage and troubleshooting.

Alberta Airsheds Council (AAC) — Most Airshed Zones have an informal documentation process ... a ‘conversation’ takes place between the airshed responder and the complainant.

Those airsheds with a formal process record the following information:

- the caller’s current physical state (healthy or sick)
- meteorological conditions at the time (cloudy, rainy etc.)
- wind conditions (windy, calm etc.)
- type of odour perceived (e.g., asphalt, rotten egg, natural gas, etc.).
- intensity of odour perceived (high, weak, etc.).
- characterization of the perceived odour (pleasant, unpleasant etc.)
- location where odour was encountered.

Alberta Energy Regulator (AER) — CIC Compliance Officers obtain as much information as they can from a complainant. The CIC procedure guide outlines the minimum information needed:

- Caller’s name (unless they wish to remain anonymous).
- Mailing address (if the caller is a member of the public).
- Phone number (immediate contact number if it is an emergency; otherwise daytime number).
- The subject matter of the call (as much detail as possible; try to record in the caller’s words).
- Location of the event (address, legal subdivision, nearest community or description of location).

Odour complaints broken down by chemical: H₂S (“rotten egg” smell), THC (petroleum smell, tar or oily smelling), SO₂ (burnt matches or industrial smelling) and “other.”

AER staff have the option of using a field surveillance inspection system (FIS) form to assist with entering the complaint into the database.

Alberta Environment and Sustainable Resource Development (AESRD) — While there is not a specific ESRD form for odour complaints, callers are asked to identify the

CASA Odour Complaints Report

source of the odour if they can (e.g., sour gas), rate the odour from 1–10, and to provide the time of day they noticed the odour.

Edmonton Waste Management Centre (EWMC) — Callers to 311 are asked for their contact information (for callback and investigation), and are asked to describe the odour and its strength (usually described as very high).

EWMC uses an “odour wheel” (see appendix) to help describe and classify odours.

Environmental Public Health (EPH) — Callers are asked for their personal contact information, the origin or location of the odour, and the odour’s description, frequency, and intensity.

Hinton Pulp — When a complaint call is received, the employee fills out an “environmental public inquiry form” (see appendix). Hinton Pulp uses the following descriptors for troubleshooting:

- Really bad smell (skunk)
- Rotten egg smell
- Rotten vegetable
- Rotten cabbage

Natural Resources Conservation Board (NRCB) — The CIC records details of each complaint in its complaint response log,” with odour complaints also requiring completion of the “Odour Report Form.” The form is faxed to NRCB’s Red Deer office within 15 minutes, with hard copies sent by GoA courier the next working day.

Oil and gas sector — If a company administrator takes the complaint call, the log entry will include the date and time of the call, contact information for the complainant, the location of the odour, and any additional comments (e.g., description of the odour, weather conditions).

Transportation sector (Altex Energy) — The Altex facility manager collects the following:

- name
- phone number
- description of the odour
- location odour was detected

Question 5:

How do you determine the appropriate response to a complaint?

The CIC (and the agencies that rely on it) have a specific protocol to rate the urgency of each call, from 1–3, with specific responses laid out for each level. Some presenters have their own systems for complaint triage, while others evaluate complaints case by case.

Alberta Airsheds Council (AAC) — There is no overall formal policy. Airshed zones often refer complainants to the CIC’s 1-800 number.

Alberta Association of Municipal Districts and Counties (AAMDC) — Municipalities examine complaints as they are submitted and determine how they should be addressed.

Alberta Energy Regulator (AER) — The Compliance Officer uses the complaint details (such as the source, adverse effect, and time sensitivity) to triage the complaint (on a scale from 1–3) and determine an appropriate response. The officer then transfers the complaint directly to an AER representative to handle (via e-mail or phone transfer), or forwards the details to an AER staff member for response during business hours. All complaints determined to be within the jurisdiction of the AER are inspected/investigated.

Alberta Environment and Sustainable Resource Development (AESRD) — Not every odour call that comes in gets an investigation. They all get a callback, but a formal investigation depends on the ability to determine what the odour is, where it’s coming from, etc.

The Compliance Officer uses information collected from the caller to help triage the complaint. This can sometimes prove difficult because “offensive” is subjective (“it stinks” does not constitute an offense. An Environmental Protection Order can be issued due to odour, but this step must be based on evidence. Urgent complaints (e.g., gas leaks) are referred to the Emergency Response Team. If the complaint is not an emergency, the officer emails the local AESRD office or to the on-call Regional Compliance Manager. If the complaint was referred to the on-call Compliance Manager, he or she must contact the CIC by phone within 15 minutes to confirm receiving the email.

Edmonton Waste Management Centre (EWMC) — A community or on-site odour survey can be triggered by two or more 311 calls relating to EWMC or Goldbar in a six-hour period, by one call from ESRD, or at the discretion of an Edmonton odour representative (for example, a proactive survey if a planned activity may cause odour concerns).

Environmental Public Health (EPH) — In the case of odour complaints, EPH’s response protocol is currently rather informal. An inspector will generally call the complainant for more details of the problem.

CASA Odour Complaints Report

Hinton Pulp responds to every odour complaint according to its defined “Public Inquiry Process” (see appendix).

Natural Resources Conservation Board (NRCB) investigates each odour complaint. Some issues can be resolved by calling operators to check what types of activities are going on. At other times, an NRCB investigator visits operations and checks for permit compliance.

Oil and gas sector — When a complaint arrives directly at a company, it is passed on to a responder who follows up by checking to see if an odour can be detected—and, if so, records the location, the odour’s description and intensity, and the weather conditions. The operator checks facilities to identify issues, and reports on any corrective actions taken.

If the CIC receives an odour complaint for the Wood Buffalo area, the compliance officer assesses it to decide whether or not to initiate the WBEA odour protocol. The officer checks the meteorological and live air-monitoring data from the WBEA, and initiates the protocol if the data indicate that odour may be a problem. The protocol is also initiated if the CIC receives two or more odour complaints about the same issue.

If the situation warrants, the AESRD identifies the zone (or zones) in which the protocol will be activated, and calls industry members in those zones to have them activate their protocols.

Each industry member checks its facilities to determine if it could be the source of the odour. Within one hour, it reports back to the CIC with its facility status, and whether any recent events may have caused the odour problem. As long as the protocol remains activated, industry members must report any changes in the status of their facilities.

If those initial reports fail to identify a source for the odour, industry representatives continue their efforts.

Transportation sector (Altex Energy) — Altex determines its response case-by-case.

Question 6:

What tools are used to investigate complaints?

- **How do you assess odours (e.g., rotten eggs) during an investigation?**

Many of the presenters have high-tech air monitoring equipment to help them detect and quantify specific pollutants, while for others the inspector's nose remains the primary diagnostic tool. EWMC uses a specially designed "odour wheel" to help people describe odours more precisely.

Alberta Airsheds Council (AAC) — Airshed zones don't currently conduct formal investigations for odour complaints.

Alberta Association of Municipal Districts and Counties (AAMDC) — Many rural municipalities do not have municipal bylaws in place to address odour issues specifically, but instead handle complaints on an issue-by-issue basis or deal with them under another municipal bylaw (e.g., nuisance, land-use).

If a municipal bylaw is in place, a peace officer or bylaw enforcement officer handles the issue. Some AAMDC members also indicated that the chief administrative officer responds to complaint issues if there is no enforceable bylaw in place.

Municipal fire departments investigate complaints regarding natural gas and refer to the appropriate agencies as required. If the odour is from an unknown source, the Government of Alberta might become involved.

Depending on the nature of the complaint, investigation or enforcement may be referred to an external party. For example, if the complaint applies directly to a confined feeding operation, the municipality redirects the complaint to the NRCB as the regulatory body. Complaints relating to energy development are directed to the AER.

Alberta Energy Regulator (AER) investigates complaints with the following tools:

- Inspector training and knowledge
- Industry operators
- Ambient air-monitoring station data
- Mobile air-monitoring unit
- FLIR Camera: Infra-red detection principle
- Photoionization Detector (PID)
- Portable ambient air analyzer (GASMET DX4040 FTIR)

AER staff attempt to verify a source and determine a responsible party. They conduct an inspection to determine a possible source (or sources). AER applies enforcement if a noncompliance is verified.

CASA Odour Complaints Report

Alberta Environment and Sustainable Resource Development (AESRD) — The AESRD investigates odour complaints using air monitoring trailers, air canisters, and its mobile air-monitoring laboratory. It specifically analyzes samples for priority pollutants: NO_x, H₂S, NH₃, O₂, THC, TRS, and BETX.

Edmonton Waste Management Centre (EWMC) — In addition to “staff with trained noses” and its specially designed “odour wheel” (see appendix), EWMC uses an array of electronic tools including Odowatch e-noses.

Environmental Public Health (EPH) — The problem may be evaluated simply by nose, because EPH has limited monitoring equipment. In some cases, an inspector will request assistance from AESRD and its mobile air-monitoring laboratory.

Hinton Pulp uses the description of the odour to help pinpoint possible causes. The shift engineer and mill co-ordinator then implement the “Odour Complaints Checks” list to troubleshoot and resolve the problem.

Natural Resources Conservation Board (NRCB) — The NRCB uses a response matrix (see appendix) to guide its investigations.

Oil and gas sector — If the WBEA odour protocol is activated, and companies in the affected zones cannot determine the source of the odour, AESRD may ask WBEA to send out its mobile monitoring laboratory. AESRD might also initiate other investigations of the odour source during the event.

Transportation sector (Altex Energy) — Altex checks local airshed information for wind speed and direction, as well as the facility operations schedule. If necessary, the facility manager checks for leaks onsite using detector tubes, etc.

Question 7:

How do you document your process, including:

- a. Information recorded from the complainant
- b. Complaint investigation
- c. Response to investigation and follow-up with complainant

Most presenters recognize the importance of documenting complaints from start to finish. Again, the CIC has the most sophisticated documentation system.

Alberta Airsheds Council (AAC) — Airshed zones often use a simple complaints log to document the process. In cases where an airshed zone acts as a conduit between a complainant and another agency or operator, it conducts a bilateral follow-up.

Alberta Energy Regulator (AER) — Findings of any investigation or inspection are entered into the field inspection system form (FIS), with the data linked to the complaint. If multiple sites are investigated after an incident, their data is linked.

The AER advises complainants (unless they're anonymous) of the investigation results. The investigator documents this follow-up conversation in the comment section of the FIS. At one time, the AER conducted a monthly random callback survey to track satisfaction with its complaint response.

Alberta Environment and Sustainable Resource Development (AESRD) — The CIC refers complaints to the appropriate agencies for investigation. As the inspectors collect information, they enter it into the CIC's online form, in order to keep all information in one place.

Edmonton Waste Management Centre (EWMC) — Community liaisons can record data using an online record-keeping tool. Most complainants receive a follow-up phone call, particularly if they specifically request one.

Environmental Public Health (EPH) — The Public Health Inspector logs every action on the request, and inputs the information into a data management system.

Hinton Pulp — Once the investigation is complete, the paperwork is distributed and filed. A copy is sent to the Technical Department, where a staff member provides a follow-up call to the inquirer.

Natural Resources Conservation Board (NRCB) — Data from the Odour Report Form is entered into an NRCB database and the case is assigned an inspector. NRCB also documents in its database all actions relating to each investigation. Anyone at NRCB can access this data. NRCB is not able to issue fines. The NRCB sometimes has to seek a court order if an operator refuses access to the site in question. Prosecution is used only as a last resort; it is costly and lengthy.

CASA Odour Complaints Report

Oil and gas sector — If the investigation has gone through the WBEA, the AESRD deactivates the Wood Buffalo odour protocol once the issue has been resolved. All of the industry members in the activated zones submit a seven-day report to AESRD and WBEA. The reports are reviewed at the WBEA quarterly meetings, to discuss any lessons learned.

Transportation sector (Altex Energy) —No formal procedures or documentation is in place.

Question 8:

Do you track complaint data? If so, how? (e.g., by number of complaints, source)?

- **Do you conduct any analysis of complaint data? If so, who does the analysis**

Most presenters collect and track data, although few agencies perform detailed analysis of that data.

Alberta Airsheds Council (AAC) — Airshed zones generally track odour complaints on a one-off basis. They do collect requests to monitor air quality, but do not yet have any formal tracking system. They track odour complaints by date, time, and location, using an Excel spreadsheet. The Wood Buffalo Environmental Association's odour project does involve some temporal/spatial analysis.

Alberta Energy Regulator (AER) conducts some analysis of its complaint data. Its annual report, available to all stakeholders, looks for trends from the previous year. Some data is reflected in monthly internal reports, which are reviewed by AER management and forwarded to the Minister of Energy. Additional analysis and in-depth studies are conducted as needed.

Alberta Environment and Sustainable Resource Development (AESRD) tracks its data through its online form. This data can be sorted in various ways, but data is not otherwise routinely analyzed. CIC staff informally track clusters of calls on a whiteboard.

Edmonton Waste Management Centre (EWMC) tracks the total number of odour calls per year, dating back to about 1999. It also breaks down the number of complaints by month, by days of the week, and by hours of the day.

Environmental Public Health (EPH) — Every service request is tracked in data management systems. AHS is working towards having one data system for all its zones.

Hinton Pulp reviewed its public inquiry data back to January 2010, in conjunction with Stantec. The analysis looked for patterns related to time of year, time of day, and wind and weather conditions.

Natural Resources Conservation Board (NRCB) tracks the number of odour complaints received each year, alongside the number of operations. The CIC stores the data entered in electronic call sheets in an active SharePoint site for one month, and then automatically relocates the call sheets to an archive site. Paper call sheets are stored for two years (the statute of limitation for environmental charges). On several occasions, odour complaints have been analyzed for specific purposes by NRCB or Agriculture and Rural Development.

CASA Odour Complaints Report

Transportation sector (Altex Energy) — No formal procedures or documentation is in place. Altex plans to eventually develop policies and forms to help them track data.

Question 9:

Does your process require that you share complaint information with other agencies/partners? If so:

- a. Which agencies/partners and what type of information?**
- b. How is this information shared?**
- c. Is FOIP an issue with respect to release of information and confidentiality?**

Most agencies give complainants the option to remain anonymous, and none share the identities of their callers without their permission. A few agencies have agreements to share information with partner organizations under certain specific circumstances.

Alberta Airsheds Council (AAC) — Policies vary from zone to zone. Complaints are mentioned at Technical Working Group meetings, but no investigations are conducted. Names are not revealed at committee meetings. Some zones include a “release of name” checkbox in their documentation process.

Alberta Energy Regulator (AER) has no process to openly share complaint information with other agencies.

Under the Freedom of Information and Protection of Privacy Act (FOIPPA), the AER cannot release any personal information. Other agencies can submit FOIP requests with the AER FOIP Coordinator for information about compliance. AER incident information can also be purchased through Environment Information Sales.

Alberta Environment and Sustainable Resource Development (AESRD) has an agreement with Environment Canada that they will be contacted under certain circumstances (in terms of odours, the only one that might apply is “Release of contaminant to the air or water which may cross Alberta border”). Environment Canada links to other federal agencies as necessary.

Edmonton Waste Management Centre (EWMC) responds to any direct calls from ESRD. It also participates with a community liaison committee that meets every two months or so. The EWMC and Goldbar Wastewater Plant coordinate odour complaints because of some linkages between operations, and also because they share contracts with third-party odour consultants.

Environmental Public Health (EPH) — If the EPH determines that another agency has jurisdiction, or would be better able to respond, the complainant is directed to that agency. For example, a caller complaining about dust or odours from a feedlot would be referred to NRCB.

Caller identity is not shared with other agencies unless the caller gives permission.

CASA Odour Complaints Report

Hinton Pulp shares its numbers of public inquiries for odour with its own staff, through the monthly Environmental Summary, with the public advisory committee at bimonthly meetings, with Alberta Environment in a monthly air emissions report (in addition to the initial notification made within 24 hours of each complaint), and with the Town of Hinton upon request. The mill manager is also available for media inquiries.

Natural Resources Conservation Board (NRCB) — The NRCB keeps the identity of all complainants confidential. If the complaint is a multi-jurisdictional issue, NRCB shares information with the appropriate agencies.

Transportation sector (Altex Energy) — The industry is currently unregulated, so Altex is not required to report or share data. They have at times shared data with the Peace Airshed Zone Association (PAZA).

Question 10:

What are the timelines associated with your process (from a complaint being received to final follow-up with complainant)?

Every presenter recognizes the importance of responding as quickly as possible. Most try to follow up within 24 hours.

Alberta Airsheds Council (AAC) — Zones do their utmost to provide quick, meaningful and appropriate responses to odour complaints—generally within 24 hours. What constitutes a “final follow-up” varies widely from organization to organization.

Alberta Association of Municipal Districts and Counties (AAMDC) did not specify.

Alberta Energy Regulator (AER) response time varies based on triage, and based on the complexity of the investigation. Most complainants receive follow-up with investigation results within 24 hours.

Alberta Environment and Sustainable Resource Development (AESRD) has a protocol to get back to complainants within 24 hours. Often, they can provide immediate response.

Environmental Public Health (EPH) — A Public Health Inspector contacts each caller within 48 hours of the initial request (an urgent complaint can trigger a faster response).

Depending on the situation, a complaint is considered closed once the issue has been resolved to the best of everyone’s abilities. The time this takes can vary widely

Hinton Pulp did not specify, but its policies and procedures stress prompt action.

Natural Resources Conservation Board (NRCB) — Most investigations are completed in a few days, with a goal of no more than ten days. Very few go beyond 90 days.

Transportation sector (Altex Energy) — Altex tries to follow up complaints immediately.

Question 11:

What lessons learned can you share about your process?

Many presenters expressed a desire to build better awareness and engagement with their communities.

Alberta Airsheds Council (AAC) — A quick response is very important.

Members of the public often approach airshed zone organizations because they are concerned and motivated to find solutions.

The AAC would find it helpful to have a protocol developed, if only to help them properly direct complaints and decide what information they can openly share. The council would also benefit from a set of tools to help inform decisions around air quality and odour complaints.

Alberta Association of Municipal Districts and Counties (AAMDC) — It is important that municipalities engage with stakeholders, residents, regulatory bodies and neighbouring municipalities for land-use planning and positive development.

Agriculture is a key industry in rural areas, and agricultural odours come with the territory. By educating residents about what they can expect, and what they should be prepared to occasionally tolerate, municipalities can help curb odour complaints.

Residents should be educated about any odour management bylaws that are in place, and about when they should direct their complaints to regulatory bodies such as the NRCB. This will help establish better communication.

Edmonton Waste Management Centre (EWMC) provided the following list:

- It is important to practice due diligence in managing odours at the source.
- When odours occur, take appropriate action to correct them (within technical reality and practicality).
- Fixing odour problems doesn't happen instantly (sometimes we need engineered solutions).
- Put an odour plan in place, with actions to take when odour complaints occur, and when weather conditions (e.g., inversions) may cause odour problems.
- Have a plan to maintain good communications with the community
- Failure to properly address odour issues increases public angst.

Hinton Pulp has some frustration with calls that don't come directly to the company. Callers sometimes contact the Town of Hinton or Alberta Environment, and this can cause delays in the investigation and follow-up. Also, information passed through ESRD might be incomplete, or unhelpful (for example, stressing the intensity of an odour rather than its description, which would be more useful for troubleshooting).

CASA Odour Complaints Report

Natural Resources Conservation Board (NRCB) would like to increase awareness of their telephone number both with the public and within the GoA. They do not currently have the resources to perform educational outreach. They hope to further streamline their investigations to make the most of limited resources. They plan to develop an odour matrix, so that needn't rush out to investigate when an operation they know is doing a generally accepted practice (e.g., spreading, agitating a lagoon).

Transportation sector (Altex Energy) — Altex would like to build more engagement with the surrounding community.

Question 12:

Do you have any tools/policies/forms related to your process that you can share?

See appendix for a collection of forms, policies and tools shared by presenters.

Section 2:

Information overview, by presenter

Alberta Airsheds Council (AAC)

The AAC reported that most Alberta airshed zones have a relatively informal process for handling odour complaints. They often refer complainants to the correct agency (e.g., ESRD, industry). Airshed zones do not investigate complaints. In some cases, they may supply complainants with canisters for them to conduct sampling. Many people are satisfied with this outcome and subsequently don't feel the need to register a formal complaint with the regulator.

Alberta's airshed zones receive from 0–60 odour complaints or issues each per year. Some zones report a “high complaints frequency” season—typically the winter in most parts of Alberta for industrial odours and spring/fall for agricultural odours.

Zones receive complaints through a number of different methods:

- Website/email
- Hard copy/observation card reporting
- WBEA's Fort McMurray Odour Project web app (odoview.com/wbea/)
- Telephone
- Walk-ins

The initial contact varies from zone to zone. A program manager, executive director, or somebody else in the administration may take a complaint. Board members or technical working group members may also provide informal responses.

Most Airshed Zones have an informal documentation process ... a ‘conversation’ takes place between the airshed responder and the complainant.

Many airshed zones record odour complaints in a simple complaints log. Zones with a formal process record the following information:

- the caller's current physical state (healthy or sick)
- meteorological conditions at the time (cloudy, rainy, etc.)
- wind conditions (windy, calm, etc.)
- type of odour perceived (e.g., asphalt, rotten egg, natural gas, etc.).
- intensity of odour perceived (high, weak, etc.).
- characterization of the perceived odour (pleasant, unpleasant, etc.)
- location where odour was encountered.

When airsheds receive odour complaints, they respond in various ways:

- They often refer complainants to the CIC, because airshed zones do not investigate incidents or enforce regulations.
- They direct complainants to the AER, their MLAs, or their municipalities.
- They offer to act as a conduit between the two parties (the complainant and the operator).

CASA Odour Complaints Report

Airshed zones don't currently conduct formal investigations for odour complaints. In cases where an airshed zone acts as a conduit between a complainant and another agency or operator, it conducts a bilateral follow-up.

Some airshed zones track basic details of odour complaints in an Excel spreadsheet, but most simply track each complaint on a one-off basis.

AAC stresses the importance of quick, meaningful and appropriate responses to odour complaints. Complainants generally receive a response within 24 hours; however, what constitutes "final follow-up" varies widely from organization to organization

Fort McMurray Community Odour Monitoring Project

Fort McMurray's Wood Buffalo Environmental Association has a highly developed system for tracking odours relative to Alberta's other airshed zones.

WBEA's Fort McMurray Community Odour Panel is a group of individuals, recruited from the city's various districts, who monitor and report odour occurrences throughout their regular day-to-day activities. They are trained to recognize and quantify the specific odour types they may encounter, and to report these observations via the WBEA website, through a web app on their smartphones, or using prepaid response observation cards. The data is collected and sent for further analysis.

More information at <http://www.odoview.com/Wbea/>.

Alberta Association of Municipal Districts and Counties (AAMDC)

After a request from CASA, the Alberta Association of Municipal Districts and Counties (AAMDC) sent a brief survey to its 69 members. Thirty-six districts and counties responded.

According to the survey, many AAMDC members rarely receive odour complaints—they cite numbers ranging from 20 per year to one odour complaint in the previous 12 years. That said, municipalities with industrial growth anticipate increased complaints in the future.

Many rural municipalities do not have municipal bylaws in place to address odour issues specifically, but instead handle complaints on an issue-by-issue basis or deal with them under another municipal bylaw (e.g., nuisance, land-use).

If a municipal bylaw is in place, the Peace Officer or Bylaw Enforcement Officer handles the issue. Some AAMDC members also indicated that the chief administrative officer responds to complaint issues if there is no enforceable bylaw in place.

Municipal fire departments investigate complaints regarding natural gas and refer to the appropriate agencies as required. If the odour is from an unknown source, the Government of Alberta might become involved.

Depending on the nature of the complaint, investigation or enforcement may be referred to an external party. For example, if the complaint applies directly to a confined feeding operation, the municipality redirects the complaint to the NRCB as the regulatory body. Complaints relating to energy development are directed to the AER.

Alberta Energy Regulator (AER)

The AER receives public complaints relating to energy industry activity. Complainants phone the Energy and Environmental 24-hour Response Line: 1-800-222-6514. This number connects them to the Government of Alberta's Co-ordination and Information Centre (CIC).

A team of ten Compliance Officers, working in shifts, operates the CIC 24 hours a day. Compliance Officers are required to have a Bachelor of Science (preferably in chemistry or environment science) plus at least two years of related experience (or equivalent).

The AER does not currently break down its odour complaint statistics by season, or time of day.

To report an energy or environmental complaint, stakeholders call the Energy and Environmental 24-hour Response Line: 1-800-222-6514. The AER and AESRD use this number for all complaints and emergencies related to the environment and energy development in Alberta.

The compliance officers who answer the 24-hour response line notify the appropriate agency and, if the situation warrants, dispatch emergency responders.

Compliance Officers break down odour complaints by chemical: H₂S ("rotten egg" smell), THC (petroleum smell, tar or oily smelling), SO₂ (burnt matches or industrial smelling) and "other."

Complaints are rated on a scale from 1–3 according to the amount of information, whether or not the source is identified, and whether there is an insignificant, minor, or significant potential adverse effect. They then take the following action:

Level 1 and 2 Complaints:

Call sheet is e-mailed to the Field Centre, on-call inspector, and Field Incident Response Support Team (FIRST) Duty Officer (DO). The AER representative returns call to stakeholder (unless anonymous) within prescribed time and gathers information.

Level 3 Complaints:

Caller is given the option to be directly transferred to the responsible AER representative or wait for a callback in approximately 15 minutes. CIC call sheet is e-mailed to Field Centre, On-Call Inspector, and FIRST DO. AER representative gathers information from the complainant.

The AER receives call transfer (or e-mail) from CIC, and gathers the following information from the complainant:

CASA Odour Complaints Report

- Complainant phone number/location (unless anonymous).
- Does complainant want to be anonymous and if no can we release their name?
- List and description of concerns. Does the complainant know the source of the odour?
- Has the complainant contacted the licensee? If yes, what information was provided?

AER staff attempt to verify a source and determine a responsible party. Then, if necessary, they conduct an onsite inspection to pinpoint the possible source (or sources).

AER representatives use a variety of tools to investigate complaints:

- Inspector training and knowledge
- Industry operators
- Ambient air-monitoring station data
- Mobile air-monitoring unit
- FLIR Camera: Infra-red detection principle
 - Hydrocarbons absorb infra-red
 - Camera shows absorption as smoke
- Photoionization Detector (PID)
 - Rapid Volatile Organic Compound detection
 - Total VOCs, 0.1 ppm to 10,000 ppm
 - Benzene, 0.1 ppm – 40ppm
- Portable ambient air analyzer (GASMET DX4040 FTIR)
 - Simultaneous analysis of up to 25 gas compounds from a library of 5000

Findings of any investigation or inspection are entered into the field inspection system form (FIS), with the data linked to the complaint. If multiple sites are investigated after an incident, their data is linked.

If a licensee is found to be in noncompliance, the AER proceeds with enforcement.

The AER advises complainants (unless they're anonymous) of the investigation results. The investigator documents this follow-up conversation in the comment section of the FIS. At one time, the AER conducted a monthly random callback survey to track satisfaction with its complaint response.

The AER conducts some analysis of its complaint data. Its annual report, available to all stakeholders, looks for trends from the previous year. Some data is reflected in monthly internal reports, which are reviewed by AER management and forwarded to the Minister of Energy. Additional analysis and in-depth studies are conducted as needed.

The AER has no process to openly share complaint information with other agencies.

Under the Freedom of Information and Protection of Privacy Act (FOIPPA), the AER cannot release any personal information. Other agencies can submit FOIP requests with

CASA Odour Complaints Report

the AER FOIP Coordinator for information about compliance. AER incident information can also be purchased through Environment Information Sales.

Alberta Environment and Sustainable Resource Development (AESRD)

AESRD received about 10,000 calls at its 24-hour Coordination of Information Centre (CIC) in 2013, of which 519 were related to odour. The CIC's response line is 1-800-222-6514.

In addition to the Natural Resources Conservation Board (NRCB) and the Alberta Energy Regulator (AER), which made their own presentations to CASA's odour working group, the CIC services the Alberta Environment Support and Emergency Response Team, Alberta Environment and Sustainable Resource Development, and Alberta Transportation.

The CIC is staffed by 10 Compliance Officers (although they are currently short-staffed at 7) with a Bachelor of Science (preferably in the fields of Chemistry or Environmental Science), plus at least 2 years of related experience (or equivalent). It takes about 18 months for a CIC Compliance Officer to be fully trained.

In 2013 the CIC received about 10,000 calls of which 519 were related to odour. AESRD also receives about 15 emails per year from industry members who are self-reporting. The same procedures apply to both calls and emails.

Compliance Officers have lights on their telephone to indicate who the incoming call is for (e.g., AESRD). While taking a call for AESRD, the Officer pulls up an online form and fills it out, gathering as much detail about the complaint as possible. Callers are asked if they wish to be anonymous and if they would like a callback. (If a caller chooses to remain anonymous they will not receive a callback.)

While AESRD does not have a specific form for odour complaints, callers are asked to identify the source of the odour if they can (e.g., sour gas), rate the odour from 1–10, and to provide the time of day they noticed the odour. The Compliance Officer uses information collected from the caller to help triage the complaint.

This can sometimes prove difficult because “offensive” is subjective (“it stinks” does not constitute an offense). An Environmental Protection Order can be issued due to odour, but this step must be based on evidence.

Not every odour call that comes in gets an investigation. Every caller gets a callback, but a formal investigation depends on the ability to determine what the odour is, where it's coming from, etc.

Urgent complaints (e.g., gas leaks) are referred to the Emergency Response Team. If the complaint is not an emergency, the officer emails the local AESRD office or to the on-call Regional Compliance Manager. If the complaint was referred to the on-call Compliance Manager, he or she must contact the CIC by phone within 15 minutes to confirm receiving the email.

CASA Odour Complaints Report

The CIC is not an investigative body – rather they collect information and pass it on to the appropriate people.

AESRD Compliance Officers in the field investigate odour complaints using air monitoring trailers, air canisters, and AESRD's mobile air monitoring laboratory. It specifically analyzes samples for priority pollutants: NO_x, H₂S, NH₃, O₂, THC, TRS, and BETX.

As complaints are investigated and the inspectors collect information, they enter it into the online form so that all the information about the complaint is in one place.

AESRD tracks its data through its online form. This data can be sorted in various ways, but data is not otherwise routinely analyzed. CIC staff informally track clusters of calls on a whiteboard.

The CIC has an agreement with Environment Canada that they will be contacted under certain circumstances (in terms of odours, the only one that might apply is “Release of contaminant to the air or water which may cross Alberta border”). Environment Canada links to other federal agencies as necessary.

The CIC often receives calls not related to the agencies they service. The CIC tries to refer those calls to the correct agency, to minimize people getting bounced around.

The CIC would like to increase awareness of their telephone number both with the public and within the GoA. They do not currently have the resources to have staff engage in educational outreach.

Edmonton Waste Management Centre (EWMC)

The City of Edmonton has a 311 hotline where residents can call to report odour complaints (along with any other concerns relating to the city, from potholes to the arena decision). Many of the odour calls to 311 do not relate to the EWMC or Goldbar Wastewater Plant. The city's drainage department, for example, follows up on calls related to the sewage and stormwater systems in the City, Epcor follows up on calls regarding the Goldbar Wastewater Plant. Gas companies are contacted for a 'natural gas' odour complaint. In other words, there are many other players in the City of Edmonton's odour call system.

If a call is related to the EWMC, it is forwarded to assigned staff/consultants at the drainage branch, the EWMC, and Goldbar.

Citywide, 46 percent of odour calls are in July and August, with 51 percent between 6 and 10 p.m.

Callers to 311 are asked for their contact information (for callback and investigation), and are asked to describe the odour and its strength (usually described as very high).

The EWMC and Goldbar Wastewater Plant coordinate odour complaints because of some linkages between operations, and also because they share contracts with third-party odour consultants.

In addition to "staff with trained noses" and its specially designed "odour wheel" (to help categorize odours), EWMC uses an array of electronic tools including Odowatch e-noses.

If a callback is requested during the initial 311 interaction, EWMC will do so.

A community or on-site odour survey can be triggered by two or more 311 calls relating to EWMC or Goldbar in a six-hour period, by one call from ESRD, or at the discretion of an Edmonton odour representative (for example, a proactive survey if a planned activity may cause odour concerns).

EWMC provided a list of lessons learned:

- It is important to practice due diligence in managing odours at the source.
- When odours occur, take appropriate action to correct them (within technical reality and practicality).
- Fixing odour problems doesn't happen instantly (sometimes we need engineered solutions).
- Put an odour plan in place, with actions to take when odour complaints occur, and when weather conditions (e.g., inversions) may cause odour problems.
- Have a plan to maintain good communications with the community
- Failure to properly address odour issues increases public angst.

Environmental Public Health (EPH)

Environmental Public Health enforces the Public Health Act (PHA) of Alberta. The act allows public health inspectors and environmental health officers to investigate issues related to public health.

The PHA includes a nuisance and general sanitation regulation—this is the area that generally applies in odour complaints. Nuisance is defined as “a condition that is or that might become injurious or dangerous to the public health, or that might hinder in any manner the prevention or suppression of disease.” The regulation also addresses public toilets.

EPH does not track the specific number of odour complaints (the term it uses is “service requests”) it receives. Service requests include situations involving both indoor and outdoor air quality.

EPH is obligated to look into every complaint it receives.

Odour complaints are reported to EPH in different ways. Some are forwarded from Health Link Alberta. The EPH also receives direct calls, emails, and walk-ins, as well as referrals from other agencies and municipalities.

When an odour complaint arrives at Health Link Alberta, the trained nurses who field AHL calls go through a specific template, logging information that is passed along to EPH.

At the EPH, receptionists are trained to collect basic information from callers before assigning the request to the appropriate PHI. PHIs also field direct calls. Callers are asked for their personal contact information, the origin or location of the odour, and the odour’s description, frequency, and intensity.

If a complaint relates to a specific location, it is passed on to the field officer for that region. If the field inspector is not available, the complaint is referred to the Edmonton office.

In the case of odour complaints, EPH’s response protocol is currently rather informal. An inspector will generally call the complainant for more details of the problem. The inspector will conduct an inspection. The problem may be evaluated simply by nose, because EPH has limited monitoring equipment. In some cases, an inspector will request assistance from AESRD and its mobile air-monitoring laboratory.

If the inspector determines there is an odour problem, the person or business responsible for the odour is required to make a plan of action. If they fail to correct the situation, EPH can issue written notice. After that, an executive order may be issued, followed by charges.

CASA Odour Complaints Report

If the EPH determines that another agency has jurisdiction, or would be better able to respond, the complainant is directed to that agency. For example, a caller complaining about dust or odours from a feedlot would be referred to NRCB.

Caller identity is not shared with other agencies unless the caller gives permission.

A Public Health Inspector contacts each caller within 48 hours of the initial request (an urgent complaint can trigger a faster response). The Public Health Inspector logs every action on the request, and inputs the information into a data management system.

Every service request is tracked in data management systems. AHS is working towards having one data system for all its zones.

Depending on the situation, a complaint is considered closed once the issue has been resolved to the best of everyone's abilities. The time this takes can vary widely.

Hinton Pulp

At Hinton Pulp, complaints are referred to as public inquiries. The company receives odour complaints via its Main Gate phone number, which is staffed 24/7. It regularly advertises the number in both local papers.

Odour complaints tend to occur more frequently in the summer months due to maintenance on effluent ponds. Most odour complaints are related to the effluent treatment system rather than the pulp mill.

Hinton Pulp received 58 odour complaints in 2013, 96 in 2012, 58 in 2011, and 28 in 2010. Most complaints occur during the summer, when people are more likely to be outdoors and to have their windows open. They also occur mostly during normal waking hours.

Hinton Pulp has a formal process for handling complaints that is outlined in a flow chart and two procedural documents. All odour complaints are reported to ESRD within 24 hours.

The employee who takes the call fills out a public inquiry form (see appendix) before redirecting the call elsewhere in the company for investigation and response.

Hinton Pulp uses the following descriptors for troubleshooting:

- Really bad smell (skunk)
- Rotten egg smell
- Rotten vegetable
- Rotten cabbage

The description of the odour helps pinpoint possible causes. The shift engineer and mill co-ordinator then implement the “Odour Complaints Checks” list to troubleshoot and resolve the problem.

Once the investigation is complete, the paperwork is distributed and filed. A copy is sent to the Technical Department, where a staff member provides a follow-up call to the inquirer.

Hinton Pulp reviewed its public inquiry data back to January 2010, in conjunction with Stantec. The analysis looked for patterns related to time of year, time of day, and wind and weather conditions.

Hinton Pulp has a variety of tools in place to help manage odour and investigate complaints (e.g., ambient monitoring station downwind of the mill operated by the West Central Airshed, stack monitors, community advisory council).

The company shares its numbers of public inquiries for odour with its own staff, through the monthly Environmental Summary, with the public advisory committee at bimonthly

CASA Odour Complaints Report

meetings, with Alberta Environment in a monthly air emissions report (in addition to the initial notification made within 24 hours of each complaint), and with the Town of Hinton upon request. The mill manager is also available for media inquiries.

Natural Resources Conservation Board (NRCB)

NRCB receives hundreds of complaints each year. (They presented a bar graph indicating numbers between 200 and 350 annually over the past five years.) NRCB receives its highest number of complaints in the spring and fall. Most complaints relate to odours from barns and lagoons, or from manure spreading.

NRCB's 24-hour complaints line connects to a dedicated line in ESRD's CIC. A team of ten Compliance Officers, working in shifts, operates the CIC 24 hours a day. Compliance Officers are required to have a Bachelor of Science (preferably in chemistry or environment science) plus at least two years of related experience (or equivalent).

The CIC records details of each complaint in its complaint response log," with odour complaints also requiring completion of the "Odour Report Form." The form is faxed to NRCB's Red Deer office within 15 minutes, with hard copies sent by GoA courier the next working day.

The NRCB investigates each odour complaint. Some issues can be resolved by calling operators to check what types of activities are going on. At other times, an NRCB investigator visits an operation and checks for permit compliance. The NRCB uses a response matrix (see appendix) to guide its investigations.

Data from the Odour Report Form is entered into an NRCB database and the case is assigned an inspector. Anyone at NRCB can access this data. NRCB is not able to issue fines, other than some very small administrative fines. The NRCB sometimes has to seek a court order if an operator refuses access to the site in question. Prosecution is used only as a last resort; it is costly and lengthy.

The NRCB tracks the number of odour complaints received each year, alongside the number of operations. The CIC stores the data entered in electronic call sheets in an active SharePoint site for one month, and then automatically relocates the call sheets to an archive site. Paper call sheets are stored for two years (the statute of limitation for environmental charges). The NRCB keeps the identity of all complainants confidential.

Oil and Gas sector (CNRL)

Roxanne Bretzlaff of Canadian Natural Resources Ltd. made a presentation as a representative example for the oil and gas sector.

She split her presentation into two parts: odour complaints received by conventional oil and gas operations, and those received via the Wood Buffalo Environmental Association (WBEA).

Conventional operations receive few odour complaints directly. Most complaints go directly to the Alberta Energy Regulator (AER; see above).

If an odour complaint does come in directly, the process is very informal. An administrator may take the call, or it could go through to a field staff member. If the call goes to an administrator, the information is recorded in a log book; otherwise, the complaint is simply dealt with as part of regular operations. A log entry will include the date and time of the call, contact information for the complainant, the location of the odour, and any additional comments (e.g., description of the odour, weather conditions).

The complaint is passed on to a responder, who follows up by checking to see if an odour can be detected—and, if so, records the location, the odour's description and intensity, and the weather conditions. The operator checks facilities to identify issues, and reports on any corrective actions taken.

Finally, all the information is communicated back to the original complainant.

The WBEA has a more formal process. Some odour complaints arrive at the WBEA directly, while others go through the AESRD hotline at the CIC. Companies sometimes also call the AESRD hotline proactively if they anticipate potential odour problems; for example, because of an emergency upset or a planned process.

If the CIC receives an odour complaint for the Wood Buffalo area, the compliance officer assesses it to decide whether or not to initiate the WBEA odour protocol. The officer checks the meteorological and live air-monitoring data from the WBEA, and initiates the protocol if the data indicate that odour may be a problem. The protocol is also initiated if the CIC receives two or more odour complaints about the same issue.

If the situation warrants, the AESRD identifies the zone (or zones) in which the protocol will be activated, and calls industry members in those zones to have them activate their protocols.

Each industry member checks its facilities to determine if it could be the source of the odour. Within one hour, it reports back to the CIC with its facility status, and whether any recent events may have caused the odour problem. As long as the protocol remains activated, industry members must report any changes in the status of their facilities.

CASA Odour Complaints Report

If those initial reports fail to identify a source for the odour, industry representatives continue their efforts. If necessary, AESRD will ask WBEA to send out its mobile monitoring laboratory. AESRD might also initiate other investigations of the odour source during the event.

If the investigation has gone through the WBEA, the AESRD deactivates the Wood Buffalo odour protocol once the issue has been resolved. All of the industry members in the activated zones submit a seven-day report to AESRD and WBEA. The reports are reviewed at the WBEA quarterly meetings, to discuss any lessons learned.

Transportation sector (Altex Energy)

Altex Energy occasionally receives one or two odour-related complaints, usually during loading; however, there's no regular pattern to their frequency. Some facilities receive daily complaints, while others have never received a complaint. The company also sometimes receives complaints when the facility is not operating.

Altex has no formal complaint process. It receives complaints by phone and deals with them on a case-by-case basis.

The initial contact is the facility manager, who has 20 years in the transportation industry. He collects the following:

- name
- phone number
- description of the odour
- location odour was detected

Altex checks local airshed information for wind speed and direction, as well as the facility operations schedule. If necessary, the facility manager checks for leaks onsite using detector tubes, etc.

Altex tries to follow up complaints immediately, although this is not a formal policy. Altex determines its response case-by-case.

No formal procedures or documentation is in place. Altex plans to eventually develop policies and forms to help them track data.

The industry is currently unregulated, so Altex is not required to report or share data. They have shared data with the Peace Airshed Zone Association (PAZA).

Altex would like to build more engagement with the surrounding community.

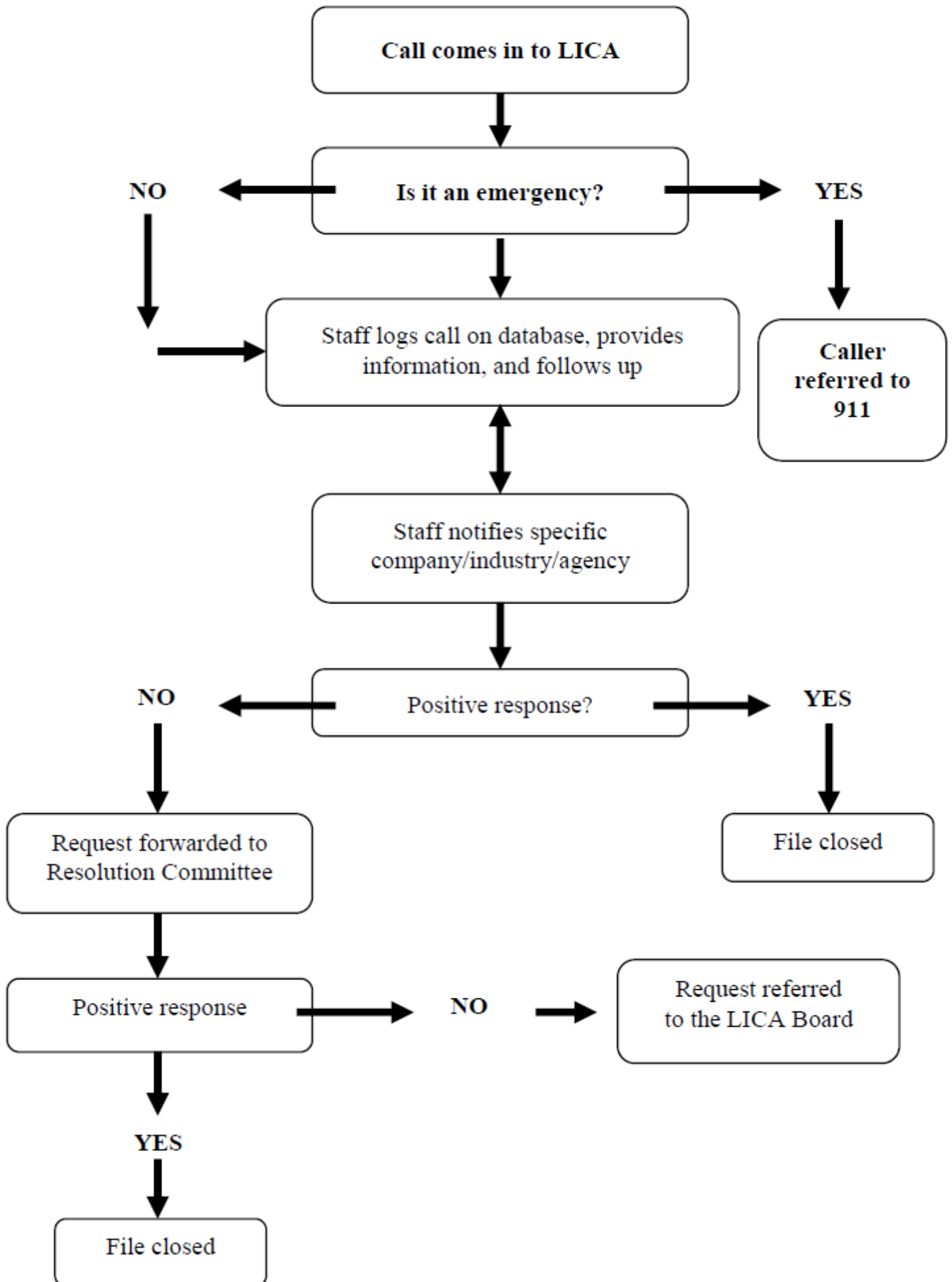
Section 3:

Appendix

Forms and policies, by presenter

Alberta Airsheds Council (AAC)

LICA'S ISSUE-RESOLUTION PROCESS





Box 8237
 5107W – 50th Street
 Bonnyville, AB T9N 2J5
 Phone: (780) 812-2182
 Fax: (780) 812-2186
 Toll Free: 1-877-797-2182
 E-Mail: lica2@lica.ca
 Website: http://www.lica.ca

Unusual Occurrence Data Collection Sheet

As part of ongoing monitoring programs, LICA needs information on unusual occurrences, which may include an unexplained noise, vibration, traffic, etc. Your observations can make us aware of these occurrences and help us identify and/or resolve the causes. The information may be shared with other organizations and agencies. **When you note an unusual occurrence, please fill out the form below as fully as possible and forward to the LICA office (contact information above). Thank you for your assistance!**

G E N E R A L I N F O R M A T I O N	Today's Date: _____		
	Name: _____	Phone#: (____) _____ - _____	
	Address: _____	E-Mail: _____	
	Legal Land Description (Rural): _____		
T Y P E O F O C C U R R E N C E	Date, Time, and Location of Occurrence: _____		
	Duration of Occurrence: _____ hour(s) _____ minute(s) _____ second(s)		
	What were the weather conditions at the time of the incident? _____		
	Wind: <input type="checkbox"/> Breeze <input type="checkbox"/> Moderate <input type="checkbox"/> Strong Direction from: <input type="checkbox"/> North <input type="checkbox"/> East <input type="checkbox"/> South <input type="checkbox"/> West		
	Outside Temperature: _____ °C or _____ °F		
	Permission to Release Name <input type="checkbox"/> Yes <input type="checkbox"/> No		
	O D O U R	Was there an odour? <input type="checkbox"/> Yes <input type="checkbox"/> No Was the odour: <input type="checkbox"/> Mild <input type="checkbox"/> Moderate <input type="checkbox"/> Strong	
		What did the odour smell like? <input type="checkbox"/> Rotten Egg <input type="checkbox"/> Chemical <input type="checkbox"/> Sweet <input type="checkbox"/> Sour <input type="checkbox"/> Hydrocarbons <input type="checkbox"/> Ammonia <input type="checkbox"/> Bleach	
	N O I S E	Was there a noise? <input type="checkbox"/> Yes <input type="checkbox"/> No	
		Was the noise: <input type="checkbox"/> Faint <input type="checkbox"/> Conversation Level <input type="checkbox"/> Like A loud TV <input type="checkbox"/> Had to cover ears	
T R A F F I C	Has the traffic changed in the last: <input type="checkbox"/> 3 months <input type="checkbox"/> 6 months <input type="checkbox"/> 1 year		
	Average daily increase in traffic (from previous number of vehicles to current number of vehicles):		
	From: <input type="checkbox"/> 10 vehicles or less <input type="checkbox"/> 11-20 vehicles	To: <input type="checkbox"/> 11-20 vehicles <input type="checkbox"/> 21-30 vehicles	
	<input type="checkbox"/> 21-30 vehicles <input type="checkbox"/> 31-40 vehicles	<input type="checkbox"/> 31-40 vehicles <input type="checkbox"/> 41-50 vehicles <input type="checkbox"/> More than 50 vehicles	
D U S T	When does the increase in traffic occur? <input type="checkbox"/> 6a.m. to 12p.m. <input type="checkbox"/> 12p.m. to 6p.m. <input type="checkbox"/> 6p.m. to 12a.m. <input type="checkbox"/> 12a.m. to 6a.m.		
	Has the road been surfaced for dust control? <input type="checkbox"/> Yes <input type="checkbox"/> No Does it need repairing? <input type="checkbox"/> Yes <input type="checkbox"/> No		
	Are there trees in the area for dust control? <input type="checkbox"/> Yes <input type="checkbox"/> No		
O T H E R I N F O R M A T I O N	What time of the day is the dust most evident? _____		
	Describe the Occurrence (attach additional sheet if required): _____ _____		

	Possible Source: _____ _____		

Alberta Energy Regulator (AER)

Close

Powered by:

Government of Alberta

Environment

Call Information

Reference #	Call Date:	Call Time:	Call Taken by:
	01/07/14	09:52	nancy welsh

Caller Information

Anonymous Caller's First Name: _____
 Caller's Last Name: _____

Organization/Facility: _____ Address: _____ Municipality: _____ Postal Code: _____

Primary Phone Number: _____ Type: _____ Ext: _____
 Secondary Phone Number: _____ Type: _____

Text

Incident Information

Incident Details/
 Complaint Statement: _____

Reported Source: _____ Approval # _____

Legal Description: LS S T R W M

Location Description: _____

Substance: _____

Quantity/Volume: _____

UN Number: _____ Class: _____

Incident Date(M/D/Y): _____ Incident Time: _____

Notifications

Notified After Hours EPO/Inspector Name: _____

Call Type: _____ Incident

Call Back Requested: No Public Complaint Rating: _____

Report Required: _____ AENV District: _____

Assigned To: _____ ASERT Notified By: _____

Agency Lead: _____ EC Notified By: _____

AER Notified? AER Field Centre

Compliance

Station Date	Start Time	End Time	Value	Units	Contaminant	Limit	Winds Degrees Km/hr
_____	_____	_____	_____	_____	_____	_____	_____

* Click on insert row to add more items

Insert Row

Release Criteria	
Release to Air?	Highly Visible? <input type="checkbox"/>
Comments:	<input type="text"/>
Release to Land?	
Comments:	<input type="text"/>
Release to Water?	Which Water body? <input type="text"/>
Comments:	<input type="text"/>
Potential for off lease/off site impact?	<input type="text"/>
Road Closures?	
Comments:	<input type="text"/>
Injuries/Fatalities?	
Comments:	<input type="text"/>
Is Media on scene?	
Details:	<input type="text"/>
Has an ERP/ERAP been Activated?	
Comments:	<input type="text"/>

Dangerous Goods Incident Criteria	
Carrier:	<input type="text"/> DG District: <input type="text"/>
Consignor:	<input type="text"/> Consignee: <input type="text"/>
TDG Severity:	Regulated: <input type="text"/>
Transport Mode:	Activity: <input type="text"/>

Email Notification			
	Needed?	Primary Contact	Secondary Contact
ASERT	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Region	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Environment Canada	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
DGRS	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>

** Enter names in GOA\firstname.lastname format and email address for Environment Canada and Secondary Contacts*

Get Reference No.

Submit & Close

Close

CIC Call Sheet E-mail (Example)

Please be advised that the CIC has received the following information.

Reference Number: 27600

Call Date & Time: 07/12/2013 5:25:08 AM

Call Taken By: Mike Smith

Caller's First Name: John

Caller's Last Name: Doe

Organization/Facility: public

Municipality: Edmonton

Primary Phone Number: (780)555-5555

Primary Phone Number Type: Home

Callback Requested: Yes

Incident Details/Complaint Statement: Very strong H2S and petroleum smell. No wind. Level 5 in a scale of 1-10. AER lead, Level 3 complaint.

Reported Source: CNRL

Legal Description: LS S T R W M

Location Description: 137 Maple Court, Edmonton

Substance: N/A

Quantity/Volume: N/A

Incident Time: 05:00:00

Incident Date: 07/10/2013

Agency Lead: AER Field

FIS Incidents - Complaint

Add search criteria

Licence Type _____
Licence Number _____
 Incident Source (circle one) F W
Pipeline Damage Type (circle one) L R H
 Licence Name _____
 Field Centre _____
 Facility Type _____
 Incident From Date _____
 Incident To Date _____
 NW Corner Location _____
 SE Corner Location _____
AER Contact: _____
 Data complete (circle one) Yes No
 Release Assessed (circle one) Yes No

General

Incident Date/Time _____
Notification Date/Time _____
 Operator Name _____
 Complete Date _____
 AER Contact _____

Contact Info

Last Name _____
First Name _____
 Phone Number _____
 Permission Received to Release Name
 (circle one) Yes No
 Anonymous Complainant (circle one) Yes No
Nearest town to complainant

Incident Number: _____

Contact Info continued

ERG Contacted (circle one) Yes No
 Referred Information
 Referred by: _____
 Referred to: _____
 Agencies Notified _____

Investigation

Complainant Contacted Operator (circle one) Yes No
 Complaint Source in Compliance (circle one) Yes No
 Associated Release Incident Number _____
 Date Complainant Advised of Finding _____
 Complainant Requested Visit (circle one) Yes No
 Date Visited _____ Mediation Required? Yes No
 Site Evaluation
 Inspection Required (circle one) Yes No
 Inspector _____
 Inspection Date _____ Insp. Result _____
 Air Monitoring Requested by _____ Date _____
 Air Monitoring Result _____
 Noise Monitoring Required _____ Local _____ Detailed
 Noise Monitoring Date _____
 Noise Monitoring Result _____ dBa

Complaint Detail

Importance	Category	Type	Global Concern
1	_____	_____	Yes No
2	_____	_____	Yes No
3	_____	_____	Yes No
4	_____	_____	Yes No
5	_____	_____	Yes No

Comments

Comment Category _____
 Comment Type _____
 Comment Date _____
 Author Name _____

Comments:

Comment Category _____
Comment Type _____
Comment Date _____
Author Name _____

Comments:

Comment Category _____
Comment Type _____
Comment Date _____
Author Name _____

Comments:

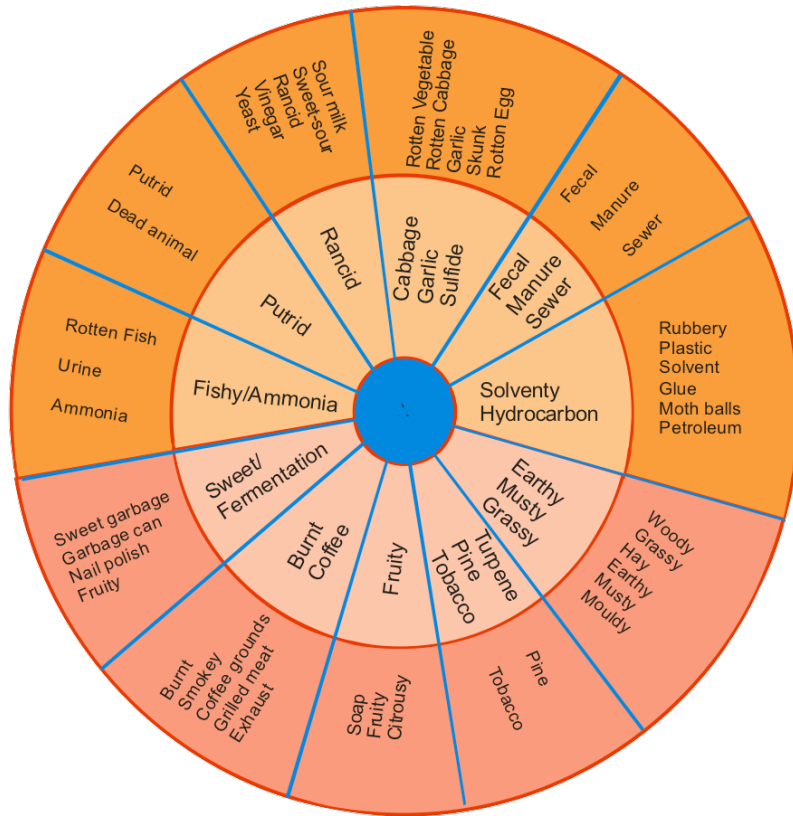
Comment Category _____
Comment Type _____
Comment Date _____
Author Name _____

Comments:

Comment Category _____
Comment Type _____
Comment Date _____
Author Name _____

Comments:

Edmonton Waste Management Centre (EWMC)



EWMC Odour Wheel

Adopted from:
Suffet, I.H. And Rosenfeld, P.E.

Hinton Pulp

ENVIRONMENTAL PUBLIC INQUIRY FORM

Technical Inquiry # _____

FILLED IN BY LPO OR SWITCHBOARD OPERATOR:

RECEIVED BY: _____

CALLER: (may remain anonymous):

NAME: _____

DATE OF INQUIRY: _____

ADDRESS: _____

TIME OF CALL: _____

PHONE # _____

CALL FORWARDED TO: _____

TIME FORWARDED: _____

NATURE OF INQUIRY: ODOUR (type _____) NOISE DUST
OTHER POLICY REQUEST

DESCRIPTION _____

TIME _____

LOCATION _____

FILLED IN BY SHIFT SUPERVISOR:

INVESTIGATED BY: _____

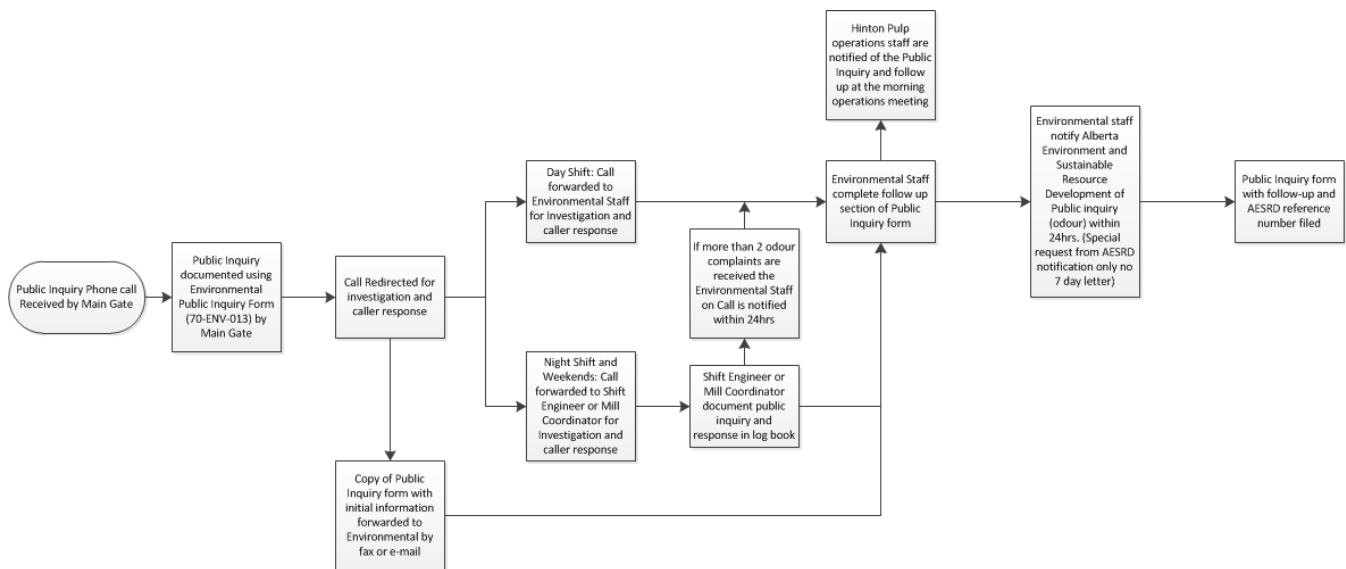
VERBAL RESPONSE _____ TIME _____

TO INQUIRER: _____

FOLLOW-UP REQUIRED? YES NO

NOTES FROM FOLLOW-UP _____

Public Inquiry Process



**Natural Resources Conservation Board
(NRCB)**



ODOUR REPORT FORM

TIME AND DATE REPORT RECEIVED:	DATE AND TIME OFFENDING ODOUR WAS NOTED:
--------------------------------	--

NAME AND ADDRESS OF PERSON FILING REPORT:	TELEPHONE (H):
E-MAIL ADDRESS (if e-mail communication is preferred):	TELEPHONE (W):

During the NRCB processing and response to this report, can you be identified as the source of the report? Yes No

Please provide as much of the information requested below for the odour you are reporting. This information will help the NRCB to identify the source of the odour and assist in developing an appropriate response.

LOCATION OF THE ODOUR:	HAVE YOU COMPLAINED ABOUT AN ODOUR COMING FROM THIS LOCATION BEFORE:
YOUR LOCATION IN RELATION TO THE ODOUR:	Yes <input type="checkbox"/> No <input type="checkbox"/> (If yes, when):

ACTIVITY CAUSING THE ODOUR (if known):

WEATHER CONDITIONS: What were the weather conditions when you noticed the odour?

GENERAL CONDITIONS:	CLOUD COVER:	WIND SPEED:	WIND DIRECTION:
<input type="checkbox"/> dry	<input type="checkbox"/> clear	<input type="checkbox"/> light	
<input type="checkbox"/> rainy	<input type="checkbox"/> light clouds	<input type="checkbox"/> steady	
<input type="checkbox"/> foggy	<input type="checkbox"/> scattered clouds	<input type="checkbox"/> strong	
<input type="checkbox"/> snowy	<input type="checkbox"/> dense clouds/ overcast	<input type="checkbox"/> gusting	

EXTENT OF THE ODOUR: How widespread was the odour? (Check one only)

<input type="checkbox"/> Localized (only noticed odour within the sight of the suspected source)	<input type="checkbox"/> Widespread (noticed odour more than 500 metres away from the suspected source)
<input type="checkbox"/> Limited Off-site Impact (noticed odour up to 500 metres from the suspected source but no further)	<input type="checkbox"/> don't know

FREQUENCY: How often have you noticed this odour in the past twelve months? (Check one only)

<input type="checkbox"/> more than once a week for several months	<input type="checkbox"/> two or three times in the past year
<input type="checkbox"/> once or twice per month	<input type="checkbox"/> once or less in the past year
	<input type="checkbox"/> don't know

INTENSITY: How strong is this odour? (Check one only)

<input type="checkbox"/> Faint (barely detectable, need to stand still and inhale facing into the wind to notice it)	<input type="checkbox"/> Strong (odour is pervasive and can be easily detected at all times)
<input type="checkbox"/> Moderate (odour is easily detected while walking and breathing normally, but is not overpowering)	<input type="checkbox"/> Very Strong (odour can be detected at all times and is causing physical symptoms such as nausea, headaches, burning sensation in eyes and nose, etc.)
	<input type="checkbox"/> don't know

DURATION: How long has this odour lasted?

DATE/TIME ODOUR BEGAN:	DATE/TIME ODOUR ENDED:
------------------------	------------------------

OFFENSIVENESS: How unpleasant is the odour? (Check one only)

<input type="checkbox"/> slightly unpleasant	<input type="checkbox"/> unpleasant
<input type="checkbox"/> moderately unpleasant	<input type="checkbox"/> highly unpleasant and causing physical discomfort
	<input type="checkbox"/> don't know

DESCRIPTION OF THE ODOUR: (Check all the words that describe the odour)

<input type="checkbox"/> acidic	<input type="checkbox"/> ammonia	<input type="checkbox"/> ashes	<input type="checkbox"/> bitter	<input type="checkbox"/> burnt
<input type="checkbox"/> chemicals	<input type="checkbox"/> corn chips	<input type="checkbox"/> decayed matter	<input type="checkbox"/> feathers	<input type="checkbox"/> fishy
<input type="checkbox"/> fresh cow manure	<input type="checkbox"/> garbage	<input type="checkbox"/> grain	<input type="checkbox"/> hay	<input type="checkbox"/> leaves
<input type="checkbox"/> manure	<input type="checkbox"/> mildew/ mold	<input type="checkbox"/> moth balls	<input type="checkbox"/> pig manure	<input type="checkbox"/> rancid
<input type="checkbox"/> rotten cabbage	<input type="checkbox"/> rotten eggs	<input type="checkbox"/> rotten leaves	<input type="checkbox"/> rotting meat	<input type="checkbox"/> sewage
<input type="checkbox"/> skunk	<input type="checkbox"/> smoke	<input type="checkbox"/> sulfur	<input type="checkbox"/> sweet	<input type="checkbox"/> urine
<input type="checkbox"/> vinegar				
<input type="checkbox"/> Other (please describe):				

ADDITIONAL COMMENTS/ OTHER RELEVANT INFORMATION:

The person providing this information acknowledges that the information was provided under the authority of the *Agricultural Operation Practices Act*, and is subject to the provisions of the *Freedom of Information and Protection of Privacy Act*, and that disclosure in accordance with the provisions of these Acts may be required.

Date of Acknowledgement	Signature (if filing paper copy of report)	Print Name
-------------------------	--	------------

Would you like to receive a follow-up call or progress report? Yes No (If yes, please ensure you have provided contact information).

Analysis of Odour Complaints for an Operation

June-Aug

Weather Conditions		Cloud Cover		Wind Speed	
Dry:	316	Clear:	239	Light:	303
Rainy:	17	Light Clouds:	59	Steady:	5
Foggy:	2	Scattered Clouds:	18	Strong:	1
Snowy:	0	Dense Clouds / Overcast:	14	Gusting:	1
Frequency Of Odour		Offensiveness Of Odour		Description Of Odour	
> once per week for several months:	317	Slightly Unpleasant:	2	Manure:	1
1-2 per month:	10	Moderately Unpleasant:	10	Pig Manure:	331
2-3 per year:	1	Unpleasant:	95		
1 or less in past year:	1	Highly Unpleasant:	223		
Not Sure:	3	Not Sure:	0		
Intensity Of Odour		Extent Of Odour			
Faint:	0	Localized:	1		
Moderate:	9	Limited Off-site Impact:	4		
Strong / Pervasive:	132	Widespread:	322		
Very Strong:	193	Don't Know:	9		
Unknown:	1				

INSPECTOR'S REVIEW
Inspector reviews NRCB files to identify permit conditions and confirm whether there have been previous complaints

OPERATOR CONTACTED
Inspector calls operator to determine if there are circumstances that could explain the odour

INSPECTION REQUIRED ?
History of complaints, operator's compliance history, odour information reviewed and decision on need for inspection made

FILE CLOSED
Inspector updates odour report in the CFO Database to indicate that no inspection undertaken & no enforcement action is required. File closed & complainant notified

ODOUR SOURCE IDENTIFIED
Obvious steps can be taken to reduce odour emissions

FILE CLOSED
Inspector updates odour report in the CFO Database to indicate that no inspection undertaken & no enforcement action is required. File closed & complainant notified

ODOUR RESULTING FROM NON-COMPLIANCE
Inspector determines that odour is result of non-compliance with permit conditions

ODOUR IS FROM GENERALLY ACCEPTED PRACTICE (Nuisance)

ODOUR IS AN INAPPROPRIATE DISTURBANCE
Odour's FIDO is sufficient to constitute an inappropriate disturbance

FILE CLOSED
Inspector updates odour report in CFO database to indicate that no enforcement action is required. File closed & complainant notified



Appendix II: Odour Complaints in Your Area: A Guide for Developing an Odour Complaint Process

Odour Complaints in Your Area:

A Guide for Developing an Odour Complaint Process

Table of Contents

About This Guide	1
Preparing for Odour Complaints.....	1
Public communication.....	1
Training.....	1
Legislation.....	2
Coordinating with local agencies/organizations	2
Handling an Odour Complaint Call.....	2
Communicating with callers.....	2
Emergency or health concerns.....	3
Referring the caller to another organization	3
Customizing the Odour Complaint Form	3
Completing the Odour Complaint Form.....	4
Ending the call	7
Triaging the complaint	7
Multiple complaints.....	8
Initial Response to Odour Complaints	8
Develop a framework for handling the initial response	8
Investigation Response to Odour Complaints	9
Updating the complainant.....	9
Safety concerns.....	9
Alternative data sources.....	9
Records management	10
Conclusion	10
References.....	11
Appendix A – Sample Odour Complaint Form	12
Appendix B – Odour Complaint Referral Process	14
Odour Complaint Decision Tree	14
Odour Complaint Call Log	15
Reference Guide	16
Reporting Odours in Your Community	21

About This Guide

The Clean Air Strategic Alliance wanted to provide guidance and advice related to a good odour complaint management process for organizations that may not have background or a lot of experience in this area. This guide outlines the factors you should consider in developing processes for handling the complaints, managing the relationship with the caller and gathering necessary information for an investigation. Please note, this guide is not a field manual for odour investigations.

Preparing for Odour Complaints

Even before your organization receives an odour complaint, there is a lot you can do to begin managing the public's expectations about odours in your area.

Public communication

Giving the public information about odour management and your odour complaint process can go a long way to managing public expectations about odours and what can be done to address them.

- Provide a way for the public to access general information about odours and odour management, such as a web page or phone line.
- Explain how and where the public can report an odour.
- Be open and transparent about the complaint process.
- If there are known odour concerns, and it is appropriate to share them, consider providing current information to the public. Let them know you are aware of the issue and what steps you are taking to address it. Ensure your organization has a policy on this so employees know what they can and cannot say.
- If needed, provide the caller with the phone number to the Coordination and Information Centre (CIC) - 1-800-222-6514. One of the CIC's many roles is to serve as a contact point for spills and complaints, including odour complaints, for Alberta Environment and Sustainable Resource Development and the Alberta Energy Regulator.

Sample information is provided in Appendix B (see Reporting Odours in Your Community).

Media relations

Create a media relations strategy well before you need it. In the event of a widespread or harmful odour, you may receive media inquiries. Ensure your employees know the policy on speaking to media and who is authorized to do so.

Training

Each organization will have odour investigation processes in place that meet their needs. This may include special training for investigators and the employees receiving complaints from the public.

Training for the employees who take the initial calls from members of the public, can make a positive impact on callers with odour complaints and help manage expectations. They should know how to:

- Stay calm when faced with an upset caller.
- Be able to listen without interrupting.
- Complete the Odour Complaint Form.
- Answer questions about why they are asking for the information on the form.
- Explain the next steps in the process to the caller.
- Understand their boundaries as to what they may and may not say to a caller. It is important they not speculate about the source of an odour.
- Stay up to date with current odour concerns so they can inform callers, if that is appropriate.

Legislation

Before collecting information, review the legislation that pertains to your industry as well as legislation about the collection, use and disclosure of personal information. Put policies in place for the storage and retention of records and ensure your employees understand their responsibilities under all legislation that may apply to your organization.

Coordinating with local agencies/organizations

Responding to an odour complaint will mean different things to different organizations depending on factors such as local industries and activities and if the location is rural or urban. It may be necessary to coordinate an investigation and response with other organizations and/or provincial agencies. It is important to do some initial work to determine:

- When your organization will be responsible for investigating the complaint.
- Under what circumstances you will pass the investigation to another organization or how you will share the work involved in the investigation.
- Who will call the complainant back within the specified timelines, especially if they did not give you permission to share their contact information.

Understanding these factors will help you develop a seamless response process for callers with odour complaints.

Handling an Odour Complaint Call

Managing callers and helping them to provide useful information is an important part of the odour investigation process.

If your organization receives odour complaint calls, but is not always responsible for investigating, you may find it valuable to follow a referral process when answering these calls (See Referring the caller to another organization).

Organizations should be aware of the local industries and natural or seasonal occurrences that may affect the volume and types of complaints. Please work with your local partners to create a list along with the types of odours commonly associated with their activities. This way, when a caller makes an odour complaint you can more easily direct them.

Communicating with callers

One important aspect of dealing with odour complaints is to ensure the caller feels they are heard and are not being dismissed.

- Thank them for calling.
- Collect the relevant details.
- Listen to them without interrupting.
- Tell them what the next step is or refer them to the appropriate organization.
- Let them know when they may receive followup information, if appropriate.

In that initial conversation it is important to gather the information outlined on the Odour Complaint Form, even if the caller believes they know where the odour is coming from. It will help you determine if they are correct.

If this is one of several complaints about the same odour, collect the information anyway as it may help pinpoint the source if it is unknown. Let the caller know that you are aware of the situation and tell them the current status, if you have that information and if it is appropriate to do so.

Remember that all complaints are valid. The caller felt it was important enough to take the time to make a complaint. It may seem urgent to them even if it does not require an urgent response (see Triaging the complaint).

Repeat complainants

The same person may call repeatedly about the same odour. This may be because they do not feel the situation has been addressed:

- Ask as to whether the odour is the same intensity as previously reported or if it is worse.
- Let them know the current status of the investigation (if the information is available and it is appropriate to do so).
- Assure them that the information was passed on to the appropriate people.
- Let them know that some odour complaints take time to investigate.
- Ask if they would like a followup call when more information is available.

It is possible that repeat callers may be frustrated and use abusive or inappropriate language on the call. Organizations should develop a policy on managing abusive callers and ensure employees know how to manage these calls.

Your organization may receive multiple calls from different people about the same odour. This may influence the investigation of the complaint (see Multiple complaints).

Emergency or health concerns

If at any point during your conversation the caller indicates the odour is causing health problems, advise them to call:

- Their family doctor.
- Health Link Alberta (1-866-408-5465).
- 911 (for emergencies only).

If it is an emergency, have them hang up and seek medical attention. They can call you back at a more convenient time.

You may suspect the caller's health is being impacted even if they have not specifically said so. For example, their voice, behaviour or speech may be affected. While you do not want to put yourself in the position of asking health questions, you may wish to suggest they contact their doctor if they are feeling unwell.

If at any point during your conversation you suspect natural gas may be the problem (rotten egg odour), advise the caller to leave the immediate area and to call 911.

Referring the caller to another organization

Your organization may not be responsible for investigating particular types of odour complaints. In these cases, referring the caller to the appropriate organization or agency right away may help reduce the caller's frustration by reducing the number of times they need to repeat information.

The Odour Complaint Decision Tree and corresponding call log (See Appendix B) are tools to help determine if the caller is reporting the odour to the correct organization and, if not, to redirect them appropriately. This is a high-level process that should be customized, as appropriate.

Customizing the Odour Complaint Form

The Odour Complaint Form captures information most commonly needed to investigate an odour complaint. Depending on your organization or industry, you may wish to customize the form to better meet your needs or record keeping requirements. In particular, ensure any legal language is specific to your organization and industry.

Completing the Odour Complaint Form

Explain to the caller that you will be asking questions necessary to look into their complaint. Gather as much information as the caller is able to provide.

If the caller is not cooperating or answering your questions, don't speculate. Simply collect as much information as possible. You may not get answers to all of your questions.

Caller information

Ask for the caller's name and phone number.

- The decision to collect an email address is up to each individual organization. It is generally not needed unless you intend to respond in writing.
- If they ask why you need the information, explain that it will be used to follow up with additional questions, if needed, as their complaint is investigated.
- They may choose to remain anonymous.
- If they choose to remain anonymous, explain that you still need to know the general location where they smelled the odour. For example, if they are in a city, what neighbourhood? If they are rural, what town or part of the county/municipality?
- If they choose to remain anonymous, they may not be able to receive followup information about their complaint.
- It is important to have a system in place to track complaints, such as reference numbers. If your organization uses reference numbers to track complaints, you have the option of providing the caller with this number so they can call in for an update.

Callers may ask why you are recording their name and number. Assure them that the collection, use and disclosure of personal information is in accordance with Alberta's privacy legislation.

Odour description

Give the caller the opportunity to describe the odour in their own words before offering a list of words for them to choose from. Phrases such as "It's kind of like..." may indicate the caller is a little unsure and it may be helpful to offer them some comparison words to help narrow down the odour.

A wide range of odours have been included on the form. Organizations may choose to customize this list based on their location or industry. For example, use bold font for the most commonly reported odours.

Script: *Please describe the odour. What does it smell like?* (Check all described by caller)

Chemical	Earthy	Fruity	Offensive	Floral
<input type="checkbox"/> Acidic <input type="checkbox"/> Bleach <input type="checkbox"/> Glue <input type="checkbox"/> Mothballs <input type="checkbox"/> Nail polish <input type="checkbox"/> Paint-like <input type="checkbox"/> Petroleum/gasoline <input type="checkbox"/> Plastic <input type="checkbox"/> Rubbery <input type="checkbox"/> Solvent <input type="checkbox"/> Tar <input type="checkbox"/> Turpentine <input type="checkbox"/> Vinegar <input type="checkbox"/> Varnish	<input type="checkbox"/> Grassy <input type="checkbox"/> Hay <input type="checkbox"/> Musty <input type="checkbox"/> Mouldy <input type="checkbox"/> Mushroom <input type="checkbox"/> Peat-like <input type="checkbox"/> Pine <input type="checkbox"/> Swampy <input type="checkbox"/> Woody <input type="checkbox"/> Yeast	<input type="checkbox"/> Citrus <input type="checkbox"/> Fermented <input type="checkbox"/> Fruity <input type="checkbox"/> Over ripened fruit	<input type="checkbox"/> Garbage <input type="checkbox"/> Garlic/onion <input type="checkbox"/> Rancid <input type="checkbox"/> Sour milk <input type="checkbox"/> Sweet & sour <input type="checkbox"/> Rotten eggs <input type="checkbox"/> Rotting meat <input type="checkbox"/> Rotting vegetables <input type="checkbox"/> Skunky <input type="checkbox"/> Urine <input type="checkbox"/> Vinegar <input type="checkbox"/> Vomit <input type="checkbox"/> Yeast	<input type="checkbox"/> Flowers <input type="checkbox"/> Fragrant <input type="checkbox"/> Herbal <input type="checkbox"/> Perfumy <input type="checkbox"/> Spicy
Smoky	Medicinal	Fecal	Putrid	Fishy
<input type="checkbox"/> Burnt plastic/rubber	<input type="checkbox"/> Alcohol <input type="checkbox"/> Ammonia	<input type="checkbox"/> Manure <input type="checkbox"/> Septic	<input type="checkbox"/> Burning carcasses	<input type="checkbox"/> Dead fish <input type="checkbox"/> Perm solution

<input type="checkbox"/> Coffee-like	<input type="checkbox"/> Menthol	<input type="checkbox"/> Sewer	<input type="checkbox"/> Dead animal
<input type="checkbox"/> Exhaust	<input type="checkbox"/> Urine		<input type="checkbox"/> Decay
<input type="checkbox"/> Grass smoke	<input type="checkbox"/> Vinegar		<input type="checkbox"/> Rotting
<input type="checkbox"/> Wood smoke			
<input type="checkbox"/> Other (describe)			

Frequency and duration

Callers may be reporting an odour upon first experiencing it or it may have been a problem for a while.

The Odour Complaint Form will collect information on:

- When they first experienced the odour.
- Whether it is constant or comes and goes.
- What time of day it is noticeable.

This information is important as it may help narrow down the source by matching odour occurrence to specific activities in industry or the community.

Intensity

Use the following categories to help the caller describe the intensity. Read all the options to the caller.

Script:

I'm going to give you three options to help determine the strength of the odour. Please choose the one the best describes your experience. (Check one)

- Faint: The odour is barely detectable, need to stand still and inhale while facing into the wind to notice it.
- Moderate: The odour is easily detected while walking and breathing normally but it is not overpowering.
- Strong: The odour is penetrating; you can't get away from it and it can easily be detected at all times.

Weather conditions

Weather conditions can affect odour dispersion and intensity. Knowing the conditions can help in the investigation of an odour complaint.

Ask the caller about their local weather at the time they noticed the odour (which may also be at the same time as the call).

- | | | | |
|--------------------------------|---|-------------------------------------|--|
| General conditions | Cloud cover | Wind speed | Wind direction |
| <input type="checkbox"/> Dry | <input type="checkbox"/> Clear | <input type="checkbox"/> None/light | Which direction is the wind coming from? |
| <input type="checkbox"/> Rainy | <input type="checkbox"/> Light clouds | <input type="checkbox"/> Steady | |
| <input type="checkbox"/> Foggy | <input type="checkbox"/> Scattered clouds | <input type="checkbox"/> Strong | |
| <input type="checkbox"/> Snowy | <input type="checkbox"/> Overcast | <input type="checkbox"/> Gusting | |

Alleged source of the odour

The caller may know or suspect they know where the source of the activity is. It is still important to collect the information on the Odour Complaint Form to confirm the source and determine the extent of the problem.

Inform the caller that they may also report the odour directly to the organization, and provide them with the name and contact information (if available) of the correct person or agency to call. Explain that many organizations prefer to receive this information directly so that they can act more quickly to address the situation.

Odour reported before

Ask if they have reported the odour before and if so, to whom. This may help you to coordinate with another agency who may already have started an investigation into the odour.

If they have reported the odour before, ask if they have a tracking or reference number to help you locate the previous complaint information.

Additional comments or information

Ask the caller if there is any other information they would like to add. Don't ask leading questions about any specific topic as this may create unrealistic expectations about what can or cannot be addressed. However, sometimes additional information offered by the caller may be helpful to the investigation.

Possible information to capture would include:

- **Offensiveness:** The caller may use words about how unpleasant the odour is (not to be confused with the description of the odour).
- **Extent:** How widespread is the odour? For example, is it only noticeable when near the alleged source?
- **Health concerns:** The caller may mention the odour is causing them to feel ill. Don't ask any health questions. Advise them to call their family doctor, Health Link Alberta (1-866-408-5465) or 911 (for emergencies only), as appropriate.
- **Caller's expectations:** The caller may state what their desired outcome is. Simply make note of this but do not promise any particular result.

Followup

If the caller provided their contact information:

- Ask if they would like to receive a followup call to let them know the status of their complaint or what steps were taken.
- If your organization is comfortable with providing responses in writing, you can offer them an option to follow up by email or mail. If you choose to do so, ensure there is a place on your form to collect this information.

Develop policies and procedures for handling followup with the callers. Here are some things to consider:

- Who will call the complainant back and in what timeframe?
- Will you provide followup in writing or only by phone?
- Would you prefer to provide the complainant with a reference number or phone number and they can call if they want to know the status?
- What mechanism will you use to track complaints if the complainant calls to check on the status of the investigation?
- How will you file and store complaint information so it can be accessed as needed?

Action taken

For the purposes of accountability and record keeping, it is important to record what action was taken as a result of the call.

If your organization uses reference numbers to track complaints, record the number here. If appropriate, provide this number to the caller. This may reassure the caller that their complaint has been documented, and it gives them a way to follow up on their complaint if they do not want to leave a phone number.

Sharing personal information

Organizations have a responsibility to ensure the collection, use and disclosure of personal information is in accordance with Alberta's privacy legislation.

- Ask if you can share their contact information with the person who will be investigating the complaint. If you are required to report to another agency, ask if you may pass their contact information on to investigators from another agency if it is required.
- If they do not give you permission to share their contact information, let them know you will still pass the complaint information on to the appropriate person. This may or may not affect their ability to receive a followup call if they request one.
- Be prepared to answer questions about which agency will receive their personal information.

You may customize the Odour Complaint Form to specifically name the legislation that your organization must follow (e.g., *Freedom of Information and Protection of Privacy Act*, *Personal Information Protection Act*). More information is available from the Office of the Information and Privacy Commissioner of Alberta (oipc.ab.ca).

Ending the call

Thank the caller for reporting the odour.

Let the caller know that some odour complaints take time to investigate.

Let the caller know what your next step will be, such as forwarding the information to an investigator or contacting another agency.

If they would like a followup call, let them know when they should expect to hear something about the status of their complaint. (See Initial Response to Odour Complaints).

Triaging the complaint

Once an odour complaint has been made, the person who logged the complaint must decide how it should move forward to ensure an appropriate level of response. Do you call someone in on the weekend or at 3 a.m.? Do you wait for normal business hours?

To help guide these decisions, develop a matrix or flowchart. For example, a Level 1 event might be investigated through normal workplace activity, a Level 2 event might require some additional resources or quicker action, and a Level 3 event would require immediate action.

If you were to proceed with this type of model, determine what triggers a move from a Level 1 complaint to Level 2 or Level 3. Triggers to move from one level to the next might include:

- Multiple calls about the same odour.
- Reports of health concerns.
- An unusual odour that cannot be attributed to normal local activity.
- Environmental concerns.
- Detection of odours that could signal a serious or dangerous situation.
- The time the odour was noticed. (Did it happen a week ago or is it happening now?)
- Access to the alleged source.

You should also be aware of any special protocols for certain types of odours or odours detected in specific locations.

Multiple complaints

You may receive multiple complaints about the same odour. In addition to being a factor in triaging the call, multiple complaints can provide other data that may be helpful in the investigation.

- Multiple calls from various locations can help determine the geographical extent of the problem. This may also help you determine the source.
- You can compare the data collected from the calls to identify patterns, such as the time of day the odour was noticed.

If it is allowed within your communication policies, you can collect the data and let callers know you are aware of the situation and are already investigating.

Initial Response to Odour Complaints

Initial response refers to the first contact back to the complainant after they have made an odour complaint. The initial response is not intended to provide the complainant with an answer or results of an odour investigation. It is a touch point to let them know the status of their complaint and what the next steps are.

In cases where the caller has chosen to remain anonymous or does not wish to receive a followup call, the initial response is the call when they make the complaint.

Providing an initial response helps the complainant feel they have been heard and that your organization is taking their complaint seriously.

Develop a framework for handling the initial response

It is important to develop a protocol for your organization's initial response. Here are some factors to consider.

- Within what time frames will you provide an initial response? A good practice followed by many organizations is to provide an initial response within 24 hours and no later than 48 hours.
- Who will call the complainant back? Consider situations where the complainant has not allowed their contact information to be shared with anyone but the person who took the initial call.
- What training will be provided to employees who answer calls from the public? What information do they need to provide an initial response if it is required of them?
- If employees are expected to answer questions from the public, how will you keep them updated about the progress of an investigation? What are the boundaries of the information they are allowed to share?
- What if you cannot complete or are delayed in completing investigation activities? How will you inform the complainant about this change?
- What broader communication channels are in place to address a situation where multiple complaints about the same odour are coming in?

Investigation Response to Odour Complaints

The investigation response focuses on good practices for investigating complaints. This is not a “how to” or field manual for investigating odours, but rather an overview of factors to consider in developing an investigation process.

Updating the complainant

Keeping someone updated about the status of their complaint sounds simple, but there are many factors to consider.

If the complainant has requested a followup call, ensure they get one within the timelines given during your initial response. Other questions your organization needs to ask include:

- If the investigation is long and complex, how often will you contact the complainant?
- If you're investigating with another agency or if you have passed on the information, who ensures followup is done?
- Who is authorized to speak to the complainant?
- What are the limits on the information that can be shared?

At a minimum, if a followup is requested, the complainant should be contacted at the conclusion of the investigation or if safety concerns delay the investigation or prevent it altogether. Follow up with the complainant even if you do not have any new information.

Safety concerns

The safety of your investigators is a primary consideration in your odour investigation plan. Policies and procedures related to working alone, managing confrontation, equipment and vehicle safety, and other workplace situations will enhance on-the-job safety.

A number of factors could prevent or delay an odour investigation, such as weather, wildfires, confrontational/dangerous people or animals, dangerous substances or inaccessible physical locations. Develop strategies to help your investigators mitigate these risks.

Please note, in these cases, it is also important to let the complainant know if your investigation will be delayed.

Alternative data sources

The information gathered on the Odour Complaint Form provides a place to start the investigation. However, it is possible that not all information will be provided or the complainant may be mistaken about some information. After all, most people are not trained in odour detection and investigation.

It's important to be aware of the alternative data sources in your area. Here are some of the common sources to become familiar with:

- Where is the nearest meteorological station?
- Do you have access to specialized monitoring equipment?
- What are the local industries and which of their activities can cause odour?
- How do you access historical investigative reports?
- What local or seasonal events trigger odour?

Each of these sources can provide valuable information but they are merely tools that should be combined with an investigator's experience and knowledge to reach a conclusion about the source of an odour.

Records management

Every organization should have a records management policy to guide you in what records should be kept, how they should be stored and protected, and how long they should be retained.

Certain records are subject to provincial and/or federal legislation, and this varies by industry. Your records management policy should take those legal requirements into consideration and employees should be informed about their responsibilities.

You need specific policies to protect personal information as part of your record storage and archiving system.

Keep records readily available until they are no longer needed (for example, the complaint investigation is concluded).

Consider implementing a system to collect and record complaints data for trending and analysis purposes.

Conclusion

Developing and implementing an odour complaint process can help your organization manage complaints in an efficient manner. Providing training to staff and managing calls from the public in a respectful and knowledgeable way can enhance your organization's reputation. Ensuring you are compliant with all relevant legislation can save you from encountering legal situations. If you don't have an odour complaint process, the time to develop one is now.

References

Members of the Clean Air Strategic Alliance Odour Complaints Task Group provided valuable insight into the development of this guide.

Other sources consulted:

CAN/CSA-ISO 10002:04, *Quality Management – Customer Satisfaction - Guidelines for Complaints Handling in Organizations*.

Clean Air Strategic Alliance, *Alberta Odour Complaints Overview*, by Scott Rollans, Edmonton, 2014.

Edmonton Waste Management Centre, *Odour Wheel*, (adapted from Suffet, I.H., and P. Rosenfeld, “The Anatomy of Odour Wheels for Odours of Drinking Water, Wastewater, Compost and the Urban Environment,” *Water Science and Technology*, Vol 55 No 5, pp. 335–344, 2007).

Environment and Sustainable Resource Development, *Coordination and Information Centre Call Receiving and Handling Procedure*, compiled by Nancy Welsh, Government of Alberta, 2013.

Natural Resources Conservation Board, *Odour Report Form*, Natural Resources Conservation Board.

New Zealand Ministry for the Environment, *Good Practice Guide for Assessing and Managing Odour in New Zealand*, Ministry for the Environment, 2003.

Texas Commission on Environmental Quality, *Odor Complaint Investigation Procedures*, Texas Commission on Environmental Quality, 2007.

Odor Basics, Understanding and Using Odor Testing Authored. St. Croix Sensory, Inc. Charles M. McGinley, P.E., Michael A. McGinley, MHS, and Donna L. McGinley. Presented at The 22nd Annual Hawaii Water Environment Association Conference Honolulu, Hawaii: 6-7 June 2000.

Helpful resource websites:

Australian Ombudsman, Unreasonable Complainant Conduct Report. June 2009.

http://www.ombudsman.gov.au/docs/better-practice-guides/Online_UnreasonableComplainantConductManual_CwthOmb.pdf

Commonwealth Ombudsman, Better Practice Guide to Complaint Handling. April 2009

<http://www.ombudsman.gov.au/pages/publications-and-media/better-practice-guides/complaint-handling.php>

Ian Cull, 5 Common Mistakes to Avoid When Handling IAQ Complaints. July 2008. Accessed from Buildings website.

<http://www.buildings.com/article-details/articleid/6219/title/5-common-mistakes-to-avoid-when-handling-iaq-complaints.aspx>

NSW Ombudsman, Managing unreasonable complainant conduct. 1st Edition. June 2009.

https://www.ombudsman.vic.gov.au/getmedia/83d094d7-0da9-45a6-b758-b73781afa08e/Unreasonable_Complainant_Conduct_project_report.pdf.aspx

St. Croix Sensory, Inc. Copyright 2003.

<http://www.fivesenses.com/Documents/Library/33%20%20Odor%20Basics.pdf>

Sundre Petroleum Operators Group. www.spog.ab.ca

Appendix A – Sample Odour Complaint Form

Odour Complaint Form

		Reference number:		
Call date:	Call time:	Call received by:		
Caller name: <i>(May remain anonymous)</i>			Phone number:	
Location where you experienced the odour:				
Odour description (Check all described by caller)				
Chemical	Earthy	Fruity	Offensive	Floral
<input type="checkbox"/> Acidic <input type="checkbox"/> Bleach <input type="checkbox"/> Glue <input type="checkbox"/> Mothballs <input type="checkbox"/> Nail polish <input type="checkbox"/> Paint-like <input type="checkbox"/> Petroleum/gasoline <input type="checkbox"/> Plastic <input type="checkbox"/> Rubbery <input type="checkbox"/> Solvent <input type="checkbox"/> Tar <input type="checkbox"/> Turpentine <input type="checkbox"/> Vinegar <input type="checkbox"/> Varnish	<input type="checkbox"/> Grassy <input type="checkbox"/> Hay <input type="checkbox"/> Musty <input type="checkbox"/> Mouldy <input type="checkbox"/> Mushroom <input type="checkbox"/> Peat-like <input type="checkbox"/> Pine <input type="checkbox"/> Swampy <input type="checkbox"/> Woody <input type="checkbox"/> Yeast	<input type="checkbox"/> Citrus <input type="checkbox"/> Fermented <input type="checkbox"/> Fruity <input type="checkbox"/> Over ripened fruit	<input type="checkbox"/> Garbage <input type="checkbox"/> Garlic/onion <input type="checkbox"/> Rancid <input type="checkbox"/> Sour milk <input type="checkbox"/> Sweet & sour <input type="checkbox"/> Rotten eggs <input type="checkbox"/> Rotting meat <input type="checkbox"/> Rotting vegetables <input type="checkbox"/> Skunky <input type="checkbox"/> Urine <input type="checkbox"/> Vinegar <input type="checkbox"/> Vomit <input type="checkbox"/> Yeast	<input type="checkbox"/> Flowers <input type="checkbox"/> Fragrant <input type="checkbox"/> Herbal <input type="checkbox"/> Perfumy <input type="checkbox"/> Spicy
Smoky	Medicinal	Fecal	Putrid	Fishy
<input type="checkbox"/> Burnt plastic/rubber <input type="checkbox"/> Coffee-like <input type="checkbox"/> Exhaust <input type="checkbox"/> Grass smoke <input type="checkbox"/> Wood smoke	<input type="checkbox"/> Alcohol <input type="checkbox"/> Ammonia <input type="checkbox"/> Menthol <input type="checkbox"/> Urine <input type="checkbox"/> Vinegar	<input type="checkbox"/> Manure <input type="checkbox"/> Septic <input type="checkbox"/> Sewer	<input type="checkbox"/> Burning carcasses <input type="checkbox"/> Dead animal <input type="checkbox"/> Decay <input type="checkbox"/> Rotting	<input type="checkbox"/> Dead fish <input type="checkbox"/> Perm solution
<input type="checkbox"/> Other (describe)				
Frequency and duration				
When did you first notice the odour?		Date:	Time:	<input type="checkbox"/> Don't know/No answer
How often have you noticed the odour? How long does it last?				
<input type="checkbox"/> One time	Start time:	End time:	<input type="checkbox"/> More than once a week	
<input type="checkbox"/> Continuous since	Date:	Time:	<input type="checkbox"/> Once or twice per month	
<input type="checkbox"/> Daily	Time of day:		<input type="checkbox"/> Other	
Intensity (How strong is the odour?)				
<input type="checkbox"/> Faint: Odour is barely detectable, need to stand still and inhale while facing into the wind to notice it. <input type="checkbox"/> Moderate: Odour is easily detected while walking and breathing normally but it is not overpowering. <input type="checkbox"/> Strong: Odour is penetrating; you can't get away from it and it can easily be detected at all times. <input type="checkbox"/> No answer.				

Continued on next page ...

Odour Complaint Form

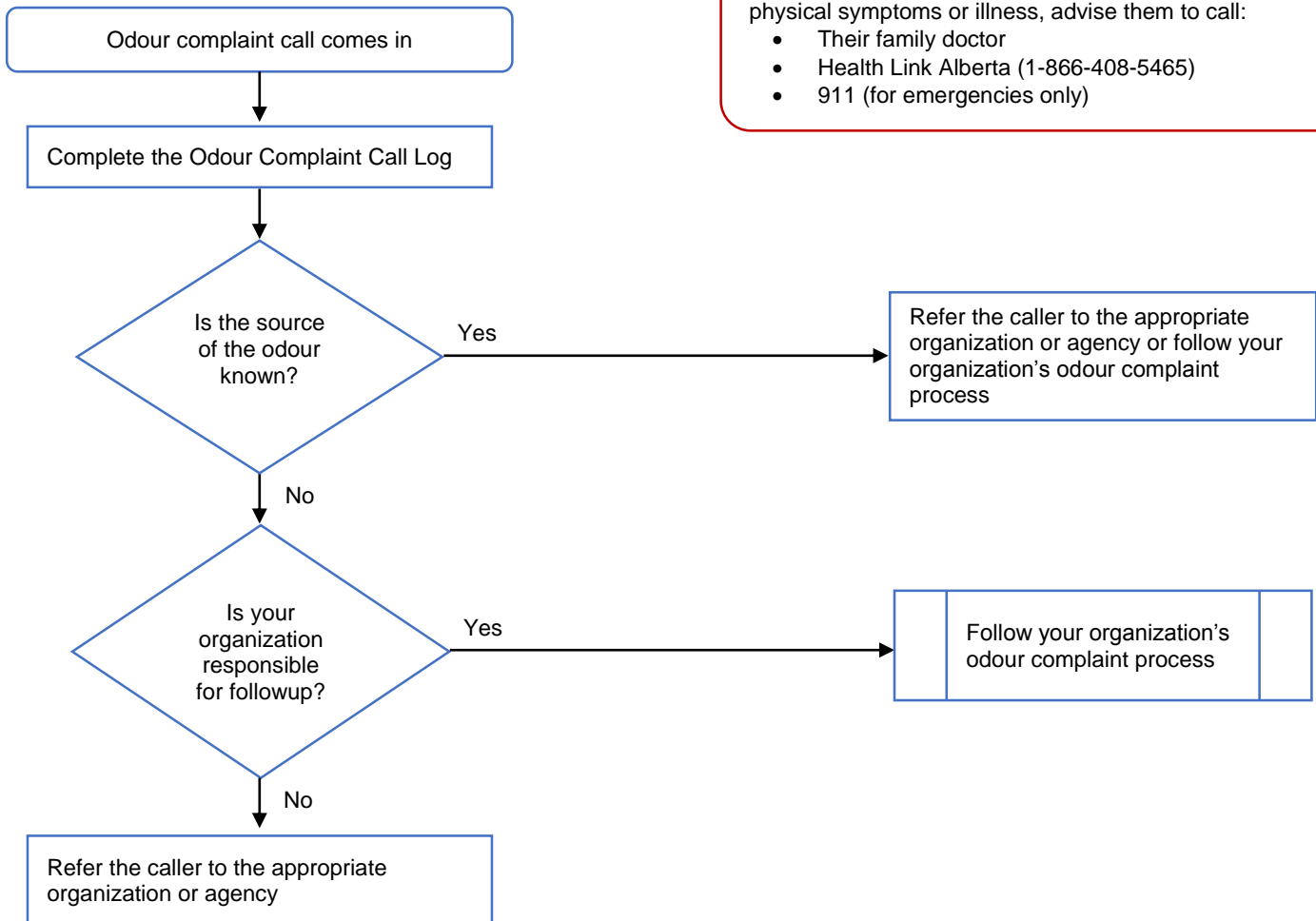
Weather conditions (When you noticed the odour)			
General conditions <input type="checkbox"/> Dry <input type="checkbox"/> Rainy <input type="checkbox"/> Foggy <input type="checkbox"/> Snowy	Cloud cover <input type="checkbox"/> Clear <input type="checkbox"/> Light clouds <input type="checkbox"/> Scattered clouds <input type="checkbox"/> Overcast	Wind speed <input type="checkbox"/> None/light <input type="checkbox"/> Steady <input type="checkbox"/> Strong <input type="checkbox"/> Gusting	Wind direction Which direction is the wind coming from? <input type="checkbox"/> Don't know/No answer
Alleged source of the odour (if known):			
Have you reported this odour before? <input type="checkbox"/> No <input type="checkbox"/> Yes If yes, who and when:			
Additional comments or information:			
The odour investigators may have additional questions. May I give your contact information to our investigators or those of another agency?			<input type="checkbox"/> No
			<input type="checkbox"/> Yes (ensure contact information is complete)
Would you like a follow up call?	<input type="checkbox"/> No	<input type="checkbox"/> Yes (ensure contact information is complete)	If yes, date followup call was made:
Action taken:			
<input type="checkbox"/> Referred caller to: _____			
<input type="checkbox"/> Sent complaint for investigation to: _____			
<input type="checkbox"/> Other: _____			

Notes from followup call:			
<i>The collection, use and disclosure of personal information on this form is in accordance with Alberta's privacy legislation.</i>			

Odour Complaint Form adapted from the Natural Resources Conservation Board Odour Report Form

Appendix B – Odour Complaint Referral Process

Odour Complaint Decision Tree



If at any time the caller indicates the odour is causing physical symptoms or illness, advise them to call:

- Their family doctor
- Health Link Alberta (1-866-408-5465)
- 911 (for emergencies only)

Chemical/Petroleum Odours

Possible sources:

- Manufacturing
- Refineries
- Oil & gas operations

Contact:
Local Organization
AER/AERSD

Manure/Sewer Odours

Possible sources:
Agriculture

Contact:
Local Organization
Municipality
NRCB

Rotten Odours

Possible sources:

- Sour oil and gas operations
- Pulp mill

Contact:
Local Organization
AER/AESRD

Odour

Possible sources:

Contact:

Odour

Possible sources:

Contact:

Odour

Possible sources:

Contact:

- Alberta Energy Regulator (AER)
1-800-222-6514
- Alberta Environment and Sustainable Resource Development (AESRD)
1-800-222-6514
- Natural Resources Conservation Board (NRCB)
1-866-383-6722
- 311 Calgary or 311 Edmonton

Customize the boxes as appropriate for your local industries and activities.

Odour Complaint Call Log

(To be used with referral to another organization)

Caller name: (optional)		Phone number: (optional)		
Call date:		Call time:		
Location where caller experienced the odour:				
Odour description (Check all described by caller)				
Chemical	Earthy	Fruity	Offensive	Floral
<input type="checkbox"/> Acidic <input type="checkbox"/> Bleach <input type="checkbox"/> Glue <input type="checkbox"/> Mothballs <input type="checkbox"/> Nail polish <input type="checkbox"/> Paint-like <input type="checkbox"/> Petroleum/ gasoline <input type="checkbox"/> Plastic <input type="checkbox"/> Rubbery <input type="checkbox"/> Solvent <input type="checkbox"/> Tar <input type="checkbox"/> Turpentine <input type="checkbox"/> Vinegar <input type="checkbox"/> Varnish	<input type="checkbox"/> Grassy <input type="checkbox"/> Hay <input type="checkbox"/> Musty <input type="checkbox"/> Mouldy <input type="checkbox"/> Mushroom <input type="checkbox"/> Peat-like <input type="checkbox"/> Pine <input type="checkbox"/> Swampy <input type="checkbox"/> Woody <input type="checkbox"/> Yeast	<input type="checkbox"/> Citrus <input type="checkbox"/> Fermented <input type="checkbox"/> Fruity <input type="checkbox"/> Over ripened fruit	<input type="checkbox"/> Garbage <input type="checkbox"/> Garlic/onion <input type="checkbox"/> Rancid <input type="checkbox"/> Sour milk <input type="checkbox"/> Sweet & sour <input type="checkbox"/> Rotten eggs <input type="checkbox"/> Rotting meat <input type="checkbox"/> Rotting vegetables <input type="checkbox"/> Skunky <input type="checkbox"/> Urine <input type="checkbox"/> Vinegar <input type="checkbox"/> Vomit <input type="checkbox"/> Yeast	<input type="checkbox"/> Flowers <input type="checkbox"/> Fragrant <input type="checkbox"/> Herbal <input type="checkbox"/> Perfumy <input type="checkbox"/> Spicy
Smoky	Medicinal	Fecal	Putrid	Fishy
<input type="checkbox"/> Burnt plastic/rubber <input type="checkbox"/> Coffee-like <input type="checkbox"/> Exhaust <input type="checkbox"/> Grass smoke <input type="checkbox"/> Wood smoke	<input type="checkbox"/> Alcohol <input type="checkbox"/> Ammonia <input type="checkbox"/> Menthol <input type="checkbox"/> Urine <input type="checkbox"/> Vinegar	<input type="checkbox"/> Manure <input type="checkbox"/> Septic <input type="checkbox"/> Sewer	<input type="checkbox"/> Burning carcasses <input type="checkbox"/> Dead animal <input type="checkbox"/> Decay <input type="checkbox"/> Rotting	<input type="checkbox"/> Dead fish <input type="checkbox"/> Perm solution
<input type="checkbox"/> Other (describe)				
Source of the odour (if known):				
Have you reported this odour to another organization? <input type="checkbox"/> No <input type="checkbox"/> Yes If yes, who and when:				
Action taken:				
<input type="checkbox"/> Referred caller to: _____ <input type="checkbox"/> Sent complaint for investigation to: _____ <input type="checkbox"/> Other: _____ _____				
Call received by:			Phone:	

Odour Complaint Decision Tree and Call Log

Reference Guide

About the Odour Complaint Decision Tree and Odour Complaint Call Log

The Odour Complaint Decision Tree outlines a referral process that is intended to help organizations collect information about odour complaints received by phone and determine the next steps to be taken.

The decision tree and corresponding call log are tools to help determine if the caller is reporting the odour to the correct organization and, if not, then to redirect them appropriately. This is a high-level process that should be customized, as appropriate. Each organization may have its own procedures to follow if an odour is reported and if it is their responsibility to investigate.

These tools are not intended to collect the comprehensive information required to conduct an odour investigation. They simply help to direct the caller to the correct organization for their complaint.

Communicating with callers

One important aspect of dealing with odour complaints is to ensure the caller feels they are heard and are not being dismissed.

- Thank them for calling.
- Collect the relevant details.
- Listen to them without interrupting.
- Tell them what the next step is or refer them to the appropriate organization.

In that initial conversation it is important to gather the information outlined on the Odour Complaint Call Log, even if the caller believes they know where the odour is coming from. It will help you determine if they are correct.

If this is one of several complaints about the same odour, collect the information anyway as it may help pinpoint the source if it is unknown. Let the caller know that you are aware of the situation and tell them the current status, if you have that information and if it is appropriate to do so.

Repeat complainants

The same person may call repeatedly about the same odour:

- Ask as to whether the odour is the same intensity as previous reports or if it is worse.
- Let them know the current status of the situation (if the information is available and it is appropriate to do so).
- Assure them that the information was passed on to the appropriate people (if your organization is responsible for the investigation).
- Let them know that some odour complaints take time to investigate.

It is possible that callers may be frustrated and use abusive or inappropriate language on the call. Ensure you are aware of your organization's policies on managing abusive callers.

Using the Decision Tree

The Odour Complaint Decision Tree is a high-level process. Organizations should take the time to customize this tool to suit their needs.

An odour complaint will mean different things to different organizations depending on factors such as local industries and activities and if the location is rural or urban.

- Organizations using this odour identification process will need to be aware of the local industries and natural or seasonal occurrences that may affect the volume and types of complaints. Please work with your local partners to create a list along with the types of odours commonly associated with their activities. This way, when a caller makes an odour complaint you can more easily direct them.
- For industry-specific organizations, this decision tree and form may be simplified to include odour information relevant to your organization. If your organization refers specific types of odours to different parts of your organization you may wish to add a flowchart that describes where these complaints are to be directed.
- Please keep in mind that you may receive calls about odours that are not due to your operations. You can use the decision tree to redirect the caller.
- Some organizations, such as municipalities, may have several possible sources for an odour.

Example 1

The following example shows how a rural municipal office might customize the decision tree based on the industries in the area.

Manure Odours <i>Possible sources:</i> ABC Plant XYZ Ranch <i>Contact:</i> <ul style="list-style-type: none">• ABC Plant: 000-000-0000• XYZ Ranch: 000-000-0000• NRCB: 1-866-383-6722	Rotten Odours <i>Possible sources:</i> <ul style="list-style-type: none">• Sour oil and gas company ABC <i>Contact:</i> <ul style="list-style-type: none">• Company ABC: 000-000-0000• AER: 1-800-222-6514	Odour <i>Possible sources:</i> <i>Contact:</i>	Odour <i>Possible sources:</i> <i>Contact:</i>
--	--	---	---

Example 2

The following example shows one way the decision tree could be customized for an organization. If a caller reports one of these four odours, the organization begins an investigation within its own operation before referring the caller to another agency.

Really Bad Smell (skunk): Methyl Mercaptans <i>Possible sources:</i> <ul style="list-style-type: none">• Stripper gas system• LVHC un-scrubbed NCGs• Chip bin• Foul condensate release• Turpentine release	Rotten Egg Smell: H₂S <i>Possible sources:</i> <ul style="list-style-type: none">• Kiln• Recovery boilers• Acid cleaning	Rotten Vegetables: Dimethyl disulphide <i>Possible sources:</i> <ul style="list-style-type: none">• Scrubber LVHC vents• Chip bin vent• DNCG vent• Condensates or biodegradation in ponds	Rotten cabbage: Dimethyl sulphide <i>Possible sources:</i> <ul style="list-style-type: none">• Scrubber LVHC NCG vent• Chip bin vent• Dilute NCGs vent• Condensates or biodegradation in ponds
--	---	--	---

Completing the Odour Complaint Call Log

Explain to the caller that you will be asking a couple of questions to help you better direct their call.

Caller name and phone number

Asking for the caller's name and number is optional. You may choose to collect this information on the call log if your organization plans to follow up on the complaint. If you are going to simply provide the caller with the phone number for another agency, it may not be necessary to collect this information.

If you do collect this information, ensure you comply with the appropriate privacy legislation.

Identifying the location

Ask for the location where the caller noticed the odour. For example, if they are in a city, what neighbourhood? If they are rural, what town or part of the county/municipality?

Describing the odour

Give the caller the opportunity to describe the odour in their own words before offering a list of words for them to choose from. Phrases such as “It’s kind of like…” may indicate the caller is a little unsure and it may be helpful to offer them some comparison words to help narrow down the odour.

A wide range of odours have been included on the form. Organizations may choose to customize this list based on their location or industry. For example, use bold font for the most commonly reported odours.

Script:

Please describe the odour. What does it smell like? (Check all described by caller)

Chemical	Earthy	Fruity	Offensive	Floral
<input type="checkbox"/> Acidic <input type="checkbox"/> Bleach <input type="checkbox"/> Glue <input type="checkbox"/> Mothballs <input type="checkbox"/> Nail polish <input type="checkbox"/> Paint-like <input type="checkbox"/> Petroleum/ gasoline <input type="checkbox"/> Plastic <input type="checkbox"/> Rubbery <input type="checkbox"/> Solvent <input type="checkbox"/> Tar <input type="checkbox"/> Turpentine <input type="checkbox"/> Vinegar <input type="checkbox"/> Varnish	<input type="checkbox"/> Grassy <input type="checkbox"/> Hay <input type="checkbox"/> Musty <input type="checkbox"/> Mouldy <input type="checkbox"/> Mushroom <input type="checkbox"/> Peat-like <input type="checkbox"/> Pine <input type="checkbox"/> Swampy <input type="checkbox"/> Woody <input type="checkbox"/> Yeast	<input type="checkbox"/> Citrus <input type="checkbox"/> Fermented <input type="checkbox"/> Fruity <input type="checkbox"/> Over ripened fruit	<input type="checkbox"/> Garbage <input type="checkbox"/> Garlic/onion <input type="checkbox"/> Rancid <input type="checkbox"/> Sour milk <input type="checkbox"/> Sweet & sour <input type="checkbox"/> Rotten eggs <input type="checkbox"/> Rotting meat <input type="checkbox"/> Rotting vegetables <input type="checkbox"/> Skunky <input type="checkbox"/> Urine <input type="checkbox"/> Vinegar <input type="checkbox"/> Vomit <input type="checkbox"/> Yeast	<input type="checkbox"/> Flowers <input type="checkbox"/> Fragrant <input type="checkbox"/> Herbal <input type="checkbox"/> Perfumy <input type="checkbox"/> Spicy
Smoky	Medicinal	Fecal	Putrid	Fishy
<input type="checkbox"/> Burnt plastic/rubber <input type="checkbox"/> Coffee-like <input type="checkbox"/> Exhaust <input type="checkbox"/> Grass smoke <input type="checkbox"/> Wood smoke	<input type="checkbox"/> Alcohol <input type="checkbox"/> Ammonia <input type="checkbox"/> Menthol <input type="checkbox"/> Urine <input type="checkbox"/> Vinegar	<input type="checkbox"/> Manure <input type="checkbox"/> Septic <input type="checkbox"/> Sewer	<input type="checkbox"/> Burning carcasses <input type="checkbox"/> Dead animal <input type="checkbox"/> Decay <input type="checkbox"/> Rotting	<input type="checkbox"/> Dead fish <input type="checkbox"/> Perm solution
<input type="checkbox"/> Other (describe)				

Source of the odour

The caller may know where the odour is coming from, such as a specific plant or a particular lake.

Ask if they have contacted any other organizations about this odour.

If they have not, let them know they can report the odour directly to the organization, and provide them with the name and contact information (if available). Explain that many organizations prefer to receive this information directly so that they can act more quickly to address the situation.

Next Steps

If they don’t wish to contact the organization directly, give them the number to the appropriate government agency. If they have already reported the odour to the organization and they do not seem satisfied with the response, provide them with the phone number to the appropriate government agency.

If your organization is responsible for addressing the odour complaint, tell the caller you will forward their report to the appropriate investigator.

If you are referring the caller to another organization, provide the name and number of the appropriate organization based on the information collected on the Odour Complaint Call Log.

If you are unsure who should handle the investigation, provide the number for Alberta Environment and Sustainable Resource Development (1-800-222-6514).

Explain to the caller that they may be asked some of the same questions again. The organization to which they are being referred will have their own methods for collecting data.

Closing the loop

Thank the caller for reporting the odour.

Let them know that some odour complaints take time to investigate.

Information for the public

Your organization may wish to provide some general information to the public about reporting odours. A generic public information sheet has been provided. The information can be used on your website, in a community newsletter, as a handout or in any other way you connect with the public in your area. You may wish to customize this information by adding local phone numbers or information about where people can get updates if there is a major incident (if this is relevant to your industry or area).

Reporting Odours in Your Community

If you are troubled by an odour in your community, do you know where to report it? Do you know how to describe it?

Before you call, have the following information ready:

- Location:** Where you were when you noted the odour
- Description:** Words you would use to describe the odour
- Frequency:** Dates and times you noticed the odour
- Duration:** How long the odour was noticeable
- Weather:** Conditions when you noticed the odour

Here are some words used to describe odours. Which matches the odour you're reporting?

Chemical	Earthy	Fruity	Offensive	Floral
<input type="checkbox"/> Acidic	<input type="checkbox"/> Grassy	<input type="checkbox"/> Citrus	<input type="checkbox"/> Garbage	<input type="checkbox"/> Flowers
<input type="checkbox"/> Bleach	<input type="checkbox"/> Hay	<input type="checkbox"/> Fermented	<input type="checkbox"/> Garlic/onion	<input type="checkbox"/> Fragrant
<input type="checkbox"/> Glue	<input type="checkbox"/> Musty	<input type="checkbox"/> Fruity	<input type="checkbox"/> Rancid	<input type="checkbox"/> Herbal
<input type="checkbox"/> Mothballs	<input type="checkbox"/> Mouldy	<input type="checkbox"/> Over ripened fruit	<input type="checkbox"/> Sour milk	<input type="checkbox"/> Perfumy
<input type="checkbox"/> Nail polish	<input type="checkbox"/> Mushroom		<input type="checkbox"/> Sweet & sour	<input type="checkbox"/> Spicy
<input type="checkbox"/> Paint-like	<input type="checkbox"/> Peat-like		<input type="checkbox"/> Rotten eggs	
<input type="checkbox"/> Petroleum/gasoline	<input type="checkbox"/> Pine		<input type="checkbox"/> Rotting meat	
<input type="checkbox"/> Plastic	<input type="checkbox"/> Swampy		<input type="checkbox"/> Rotting vegetables	
<input type="checkbox"/> Rubbery	<input type="checkbox"/> Woody		<input type="checkbox"/> Skunky	
<input type="checkbox"/> Solvent	<input type="checkbox"/> Yeast		<input type="checkbox"/> Urine	
<input type="checkbox"/> Tar			<input type="checkbox"/> Vinegar	
<input type="checkbox"/> Turpentine			<input type="checkbox"/> Vomit	
<input type="checkbox"/> Vinegar			<input type="checkbox"/> Yeast	
<input type="checkbox"/> Varnish				
Smoky	Medicinal	Fecal	Putrid	Fishy
<input type="checkbox"/> Burnt plastic/rubber	<input type="checkbox"/> Alcohol	<input type="checkbox"/> Manure	<input type="checkbox"/> Burning carcasses	<input type="checkbox"/> Dead fish
<input type="checkbox"/> Coffee-like	<input type="checkbox"/> Ammonia	<input type="checkbox"/> Septic	<input type="checkbox"/> Dead animal	<input type="checkbox"/> Perm solution
<input type="checkbox"/> Exhaust	<input type="checkbox"/> Menthol	<input type="checkbox"/> Sewer	<input type="checkbox"/> Decay	
<input type="checkbox"/> Grass smoke	<input type="checkbox"/> Urine		<input type="checkbox"/> Rotting	
<input type="checkbox"/> Wood smoke	<input type="checkbox"/> Vinegar			
Other (describe)				

Where to call

If you smell natural gas (rotten eggs), leave the immediate area. Once safely away, call 911.

For other odours, if you know the source, you can call the organization directly. This will help your complaint to be acted on more quickly. Or you can call one of the following provincial or municipal numbers:

- Alberta Energy Regulator (AER) – Oil and gas
1-800-222-6514
- Alberta Environment and Sustainable Resource Development (AESRD) – Environmental
1-800-222-6514
- Natural Resources Conservation Board (NRCB) – Agricultural
1-866-383-6722
- 311 Calgary or 311 Edmonton – Municipal for Edmonton and Calgary



If at any time the odour is causing physical symptoms or illness, call:

- Your family doctor
- Health Link Alberta (1-866-408-5465)
- 911 (for emergencies only)

Appendix III: Odour Complaint Referral Process



Odour Complaint Referral Process

Report on Pilot Testing provided to
CASA's Complaints Task Group
February 6, 2015

Lori Weltz
Yellow Dog Communications

Table of Contents

Background	1
Pilot Format	1
Pilot Feedback	2
Wood Buffalo Environmental Association	2
Strathcona Industrial Association	2
Sundre Petroleum Operators Group	4
Natural Resources Conservation Board	4
311 Edmonton	5
Northeast Capital Industrial Association	5
Coordination and Information Centre	5
Recommendations	6
Appendix A: Odour Complaint Decision Tree	7
Appendix B: Odour Complaint Call Log	8
Appendix C: Reference Guide	9
Appendix D: Public Handout	13
Appendix E: Full Pilot – Feedback Form	14
Appendix F: Limited Pilot – Feedback Form	17

Background

The Clean Air Strategic Alliance (CASA) is working with its stakeholders to better direct people calling to report an odour. CASA's Complaints Task Group developed a draft tool to help telephone operators determine the appropriate agency/group to whom callers should be directed. Part of this work included common language to help operators get the appropriate information from the caller and quickly triage calls.

The Odour Complaint Decision Tree is intended to help organizations collect information about odour complaints received by phone and determine the next steps that should be taken. This is a high-level process that should be customized, as appropriate, for each organization using it.

The decision tree and corresponding Odour Complaint Call Log are preliminary tools to help determine if the caller is reporting the odour to the correct organization and if not then to redirect them appropriately.

These tools are not intended to investigate odour complaints: they are to help receptionists, operators and others who answer calls from the public to make appropriate referrals. Each organization may have its own procedures to follow if an odour is reported and if it is their responsibility to investigate it.

Four documents were developed (See Appendices):

- Odour Complaint Decision Tree
- Odour Complaint Call Log
- Reference Guide
- Public Handout

The task group proposed a pilot test be conducted to determine if the decision tree process would work and if the content in the documents was useful.

Pilot Format

The pilot was designed to use two methods to test the materials. To participate in the full pilot, organizations needed to be able to meet certain criteria:

- It was probable that the organization would receive several odour complaints within the pilot timeframe.
- The organization had no formal odour complaint referral process in place already.
- The employees who answered the phone would be willing to complete the feedback forms.

The limited pilot was for organizations that could not meet the requirements for the full pilot. They were asked to review the materials and provide feedback, but not test the referral process.

The following organizations were contacted to participate:

Full pilot:

- Wood Buffalo Environmental Association (WBEA)
- Strathcona Industrial Association
- Sundre Petroleum Operators Group

Limited pilot:

- Natural Resources Conservation Board
- 311 Edmonton/Drainage
- Northeast Capital Industrial Association
- CIC

The Complaints Task Group members also looked for a rural municipality that might be willing to participate in the pilot; however, no municipality was identified.

Timelines:

- October 2014: Organizations were approached about their willingness to participate in the pilot or review materials.

- November 18 to December 12, 2014: Pilot/review period is underway.
- November 18, 2014: Materials, instructions and feedback forms were sent to participants.
- December 12, 2014: A reminder email about the end of the pilot was sent to participants.

Pilot Feedback

Wood Buffalo Environmental Association

The Wood Buffalo Environmental Association (WBEA) was eager to participate in the pilot. They did caution that the test period was not during the time of year when they receive a lot of odour complaints.

The WBEA received only one complaint during the test period. They did use the decision tree and call log and referred the caller to the appropriate organization.

Feedback Form Questions	WBEA's Responses
Did you customize the call log or decision tree? If so, how?	No
Is there information in the decision tree, reference guide or call log that requires more clarification?	No
Please provide any general feedback that will help us improve the call log and/or the process to appropriately direct odour complaints.	The description of weather conditions could be added (rain, snow, sunny, clear, cloudy) and "wind conditions" (calm winds, windy).
Please review the public handout information and provide any feedback on the content.	<did not respond>

Strathcona Industrial Association

The Strathcona Industrial Association (SIA) agreed to participate in the full pilot. Materials were sent to the SIA Environment Committee through their stakeholder relations consultant. There were some questions from this group about the intended audience which was clarified prior to the materials being sent out to 17 committee members. Upon receiving and reviewing the materials, they advised:

"Odor complaints (from public) do not occur often. The SIA at most receives ~3-4 odor complaints every year, and probably less so at the facility level (for example: our facility has not received any odor complaints from the public for at least 4-5 years). So you may not get any response from SIA members because the trial period of 4 weeks (from now till Dec-12) is too short for meaningful evaluation."

Committee members were immediately advised by email that if they felt they could not participate in the full pilot, CASA would appreciate their feedback on the materials. The feedback form for the limited pilot was emailed to them. Only one response was received.

The respondent did not complete the feedback form in full and was responding on behalf of one member of the SIA.

Feedback Form Questions	SIA Member Responses
In your opinion, will the decision tree help an operator to direct a caller to the correct organization? Why or why not?	<did not respond>
Keeping in mind that this process is intended to gather information for call referral, not investigation, does the call log collect enough information? If not, what other information would be useful.	<did not respond>
Is there information in the decision tree, reference guide or call log that requires more clarification?	<did not respond>

Feedback Form Questions	SIA Member Responses
Please provide any general feedback that will help us improve the decision tree, call log and reference guide.	<did not respond>
Please review the public handout information and provide any feedback on the content.	<did not respond>
Other comments:	<p>Call log: should have a place for name of caller. This field can be left blank if caller declines to leave name</p> <p>Call log: there should be a field asking “does caller wants to be contacted/responded to” so that facility knows if they need to call the caller back or not.</p> <p>Call log: there should be a field for phone number or email address if caller wants facility to inform him/her on the development.</p> <p>Call log: only has field for “location of odor” and “type of odor” – need blank space for more detail of the incident if caller has detailed information. Right now no place to record such information</p> <p>Call log: “Have you reported this odor to another organization” – is this a q for the caller or the person who answered the call??? Should ask the caller “if he/she has reported this to another organization”.</p> <p>Call log: missing weather condition (if known) at the time of the incident, including wind speed, direction, temperature inversion, rainy, sunny etc. if known.</p> <p>Decision tree: looks fine except for the bottom on what odor reporting to which organization. Hard to determine.</p> <p>Reference Guide: It is actually a SOP/ procedure to respond to odor complaint, and the call log is only part of this procedure. We have something similar at our facility and we call it “Public Complaint response” SSOP (Site Specific Work Practice”. We use it for responding to various public complaints, not just odors. For example: odor, noise, flaring (black-smoking), our site condition/vegetation/weed/fenceline rubbish etc.</p> <p>Public Handout: Looks OK. May want to > evaluate whether it is appropriate to ask public to open the windows if they smell rotten egg odor. What about is odor is from outside? > Evaluate if you want to make reference (tie-to) to Shelter-in-place to respond to industrial incidents, such as asking people to listen to public broadcast (TV, radio etc.) if there is emergency in the area and need to take shelter?</p>

Sundre Petroleum Operators Group

Sundre Petroleum Operators Group agreed to participate in the pilot. Pilot materials and instructions were sent on November 18, 2014. They did not provide any feedback.

Natural Resources Conservation Board

The Natural Resources Conservation Board (NRCB) has a strong complaints investigation process in place already. They participated in the limited pilot and provided feedback from two respondents.

Respondent 1 completed the feedback form.

Feedback Form Questions	NRCB's Responses
In your opinion, will the decision tree help an operator to direct a caller to the correct organization? Why or why not?	Somewhat-the NRCB shares a call centre with ESRD. Often times odour complaints go to both organizations as complainants don't know the source of the odour. If there was a way we could narrow down odours as being Agricultural or Environmental that may reduce some duplicate complaints. However, I realize that this may be quite difficult to do.
Keeping in mind that this process is intended to gather information for call referral, not investigation, does the call log collect enough information? If not, what other information would be useful.	Yes, I believe so
Is there information in the decision tree, reference guide or call log that requires more clarification?	No—I believe the documents are intended to be at a higher level, so I think the level of detail is appropriate
Please provide any general feedback that will help us improve the decision tree, call log and reference guide.	<did not respond>
Please review the public handout information and provide any feedback on the content.	I think it is very important to stress that if a caller is experiencing health issues, that they need to call their doctor or health link—so I think your emphasis on it is excellent. The NRCB continues to advise callers to do the same
Other comments:	<did not respond>

Respondent 2 provided comments directly in the documents using “track changes.” This respondent initially assumed that this process would be used by the NRCB call centre so the respondent called to clarify how these documents would work for them. The respondent advised that some of the feedback provided had been done so with the above assumption in mind and CASA can disregard those statements.

On the Odour Complaint Decision Tree, the respondent:

- Corrected the NRCB phone number to 1-866-383-6722.
- Deleted local lakes/ponds as a possible source under “Early Odours” with the notation that “We deal with livestock operations and manure handling.”

No comments were made on the Odour Complaint Call Log.

The comments made on the Reference Guide indicated that certain parts of the process would not work in the NRCB call centre. These comments were made before the respondent understood who the intended audience was, and therefore, disregarded.

The only change to the public handout was to correct the NRCB phone number to 1-866-383-6722.

311 Edmonton

311 Edmonton was approached in the pre-pilot phase to determine if it would be appropriate for them to participate. 311 Edmonton already has a well-established referral process that they use when operators receive an odour complaint. The Complaints Task Group decided they were not a good candidate for the full pilot test but that their feedback on the materials would be valuable.

311 provided a contact in Drainage with the City of Edmonton. The drainage department leads the odour investigation process for the city. The contact person was away for part of the pilot period and repeated attempts to contact this person during the pilot period went unanswered. There is no feedback from the City of Edmonton in this report.

Northeast Capital Industrial Association

The Northeast Capital Industrial Association (NCIA) does not receive many odour complaint calls. They participated in the limited pilot by reviewing the materials and completing the feedback form.

Feedback Form Questions	NCIA's Responses
In your opinion, will the decision tree help an operator to direct a caller to the correct organization? Why or why not?	Possibly, although there may be too many categories and too many opportunities for miss-directing a caller. I would suggest that there should be at most two or three re-directs...or this process could become quite cumbersome and leave a caller feeling like they were just getting bounced from one organization to another.
Keeping in mind that this process is intended to gather information for call referral, not investigation, does the call log collect enough information? If not, what other information would be useful.	I think the call log is fine and is a useful tool.
Is there information in the decision tree, reference guide or call log that requires more clarification?	See my point above about the decision tree.
Please provide any general feedback that will help us improve the decision tree, call log and reference guide.	In general when someone calls an organization (let's assume that they have not called a regulator), they are looking for help to resolve something that is bothering them. Bouncing them around too much from organization to organization is not going to be seen as being helpful to them. Therefore, I would suggest limiting the number of times someone gets re-directed, otherwise the follow up and circle back to that individual will get lost and create an even larger credibility issue.
Please review the public handout information and provide any feedback on the content.	I like this document as it provides very useful information and contact information for regulatory agencies and municipalities.
Other comments:	Thanks for the opportunity to provide input on this file.

Coordination and Information Centre

The Coordination and Information Centre (CIC) has highly trained employees answering odour complaint calls and are not the intended audience for this referral process. They were asked to review the materials and provide feedback as part of the limited pilot test. No feedback was received.

Recommendations

1. The nature of some feedback suggests that the intended use of the decision tree and call log as a referral process (as opposed to an investigative process) was not completely clear.

Recommendation: Clarify the intended purpose (referral) and audience on the decision tree, call log and reference guide documents. Write introductory text for use in a letter/email and on a website that reinforces this message.

2. Feedback on the decision tree was mixed. Some respondents felt it provided an appropriate amount of information and direction while others felt it may be too complex.

There was also a suggestion that the boxes at the bottom would be difficult to use. As only one organization used the full pilot process, there is not data to support this one way or the other. At the time of the pilot, the Complaints Task Group was still looking into additional information that could be included in these boxes.

Recommendations:

- Correct the NRCB phone number.
- Look for steps that can be removed or simplified in the decision tree.
- Provide an example in the reference guide about what a customized decision tree might look like.
- Add more information to the odour boxes. If it is not possible to add enough generic information, perhaps revamp the odour box section to give two or three examples and leave the other boxes blank, to be completed by the organization using it.

3. Suggested changes to the call log related to adding fields to collect information that would be necessary for an odour investigation, such as contact information or weather conditions. All other comments indicate that it is a useful tool.

Recommendation: Do not make changes to the call log.

4. Relatively few comments were received about the reference guide.

Recommendation:

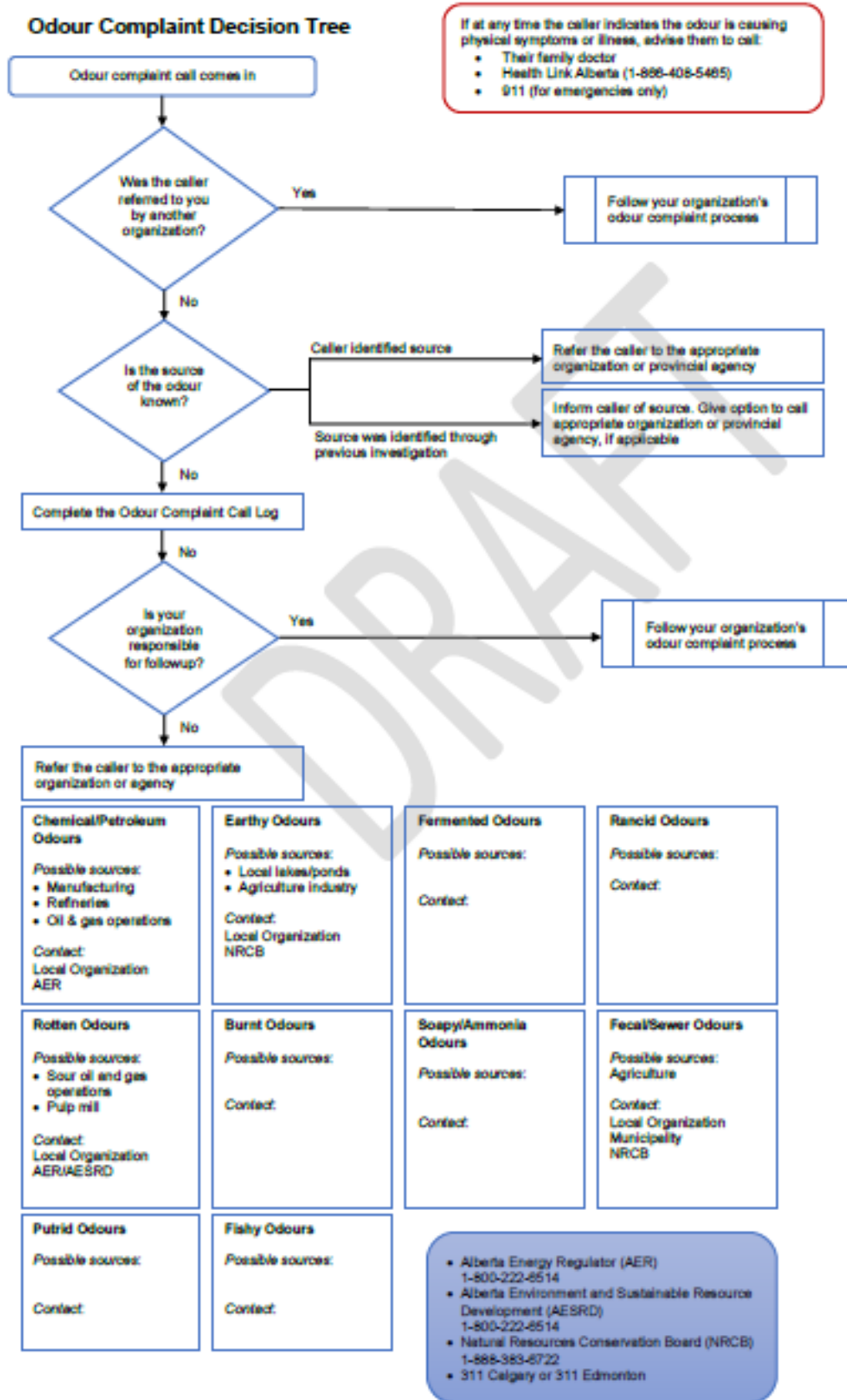
- Make the revisions necessary to support the changes being made in the other documents.
- Provide an example about what a customized decision tree might look like.
- Add a "Who is this guide for" section that emphasizes the referral aspect of the tools.

5. The public handout was generally well received.

Recommendations:

- Correct the NRCB phone number.
- Add a sentence about knowing what to do in case of an emergency/evacuation.
- Re-evaluate the content on natural gas odours and provide clearer instructions.

Appendix A: Odour Complaint Decision Tree



Appendix B: Odour Complaint Call Log

Odour Complaint Call Log

Call date:		Call time:	
Location where caller experienced the odour:			
Odour description (Check all that apply)			
<input type="checkbox"/> Chemical <input type="checkbox"/> Rubbery <input type="checkbox"/> Plastic <input type="checkbox"/> Solvent <input type="checkbox"/> Glue <input type="checkbox"/> Mothballs <input type="checkbox"/> Petroleum/ gasoline <input type="checkbox"/> Bleach <input type="checkbox"/> Acidic <input type="checkbox"/> Paint-like	<input type="checkbox"/> Earthy <input type="checkbox"/> Woody <input type="checkbox"/> Grassy <input type="checkbox"/> Hay <input type="checkbox"/> Musty <input type="checkbox"/> Mouldy	<input type="checkbox"/> Fermented <input type="checkbox"/> Fruity <input type="checkbox"/> Over ripened fruit <input type="checkbox"/> Citrus <input type="checkbox"/> Garbage <input type="checkbox"/> Nail polish	<input type="checkbox"/> Rancid <input type="checkbox"/> Sour milk <input type="checkbox"/> Sweet & sour <input type="checkbox"/> Vinegar <input type="checkbox"/> Yeast
<input type="checkbox"/> Rotten <input type="checkbox"/> Rotting vegetables/ cabbage <input type="checkbox"/> Skunk <input type="checkbox"/> Rotten eggs <input type="checkbox"/> Garlic/onion	<input type="checkbox"/> Burnt <input type="checkbox"/> Smoky <input type="checkbox"/> Coffee-like <input type="checkbox"/> Exhaust	<input type="checkbox"/> Soapy <input type="checkbox"/> Medicinal <input type="checkbox"/> Ammonia <input type="checkbox"/> Urine	<input type="checkbox"/> Fecal <input type="checkbox"/> Manure <input type="checkbox"/> Sewer
<input type="checkbox"/> Putrid <input type="checkbox"/> Dead animal <input type="checkbox"/> Decay	<input type="checkbox"/> Fishy	<input type="checkbox"/> Other (describe) <input type="checkbox"/>	
Source of the odour (if known):			
Have you reported this odour to another organization? <input type="checkbox"/> No <input type="checkbox"/> Yes If yes, who and when:			
Action taken:			
<input type="checkbox"/> Referred caller to: _____ <input type="checkbox"/> Sent complaint for investigation to: _____ <input type="checkbox"/> Other: _____ _____			
Call received by:		Phone:	

Odour Complaint Decision Tree and Call Log

Reference Guide

DRAFT

Using the Odour Complaint Decision Tree and Odour Complaint Call Log

The Odour Complaint Decision Tree is intended to help organizations collect information about odour complaints received by phone and determine the next steps that should be taken. This is a high-level process that should be customized, as appropriate, for each organization using it.

The decision tree and corresponding call log are preliminary tools to help determine if the caller is reporting the odour to the correct organization and if not then to redirect them appropriately. Each organization may have its own procedures to follow if an odour is reported and if it is their responsibility to investigate it.

Communicating with callers

One important aspect of dealing with odour complaints is to ensure the caller feels they are heard and are not being dismissed.

- Thank them for calling.
- Collect the relevant details.
- Listen to them without interrupting.
- Tell them what the next step is or refer them to the appropriate organization.

In that initial conversation it is important to gather the information outlined on the Odour Complaint Call Log, even if the caller is pretty sure about where the odour is coming from. It will help you determine if they are correct.

If this is one of several complaints about the same odour, collect the information anyway as it may help pinpoint the source if it is unknown. Let the caller know that you are aware of the situation and tell them the current status.

Repeat complaints

The same person may call repeatedly about the same odour:

- Ask as to whether the odour is the same intensity as previous reports or if it is worse.
- Let them know the current status of the investigation (if you know).
- Assure them that the information was passed on to the appropriate people (if your organization is responsible for the investigation).
- Let them know that some odour complaints take time to resolve and they may not notice a difference immediately.

Using the Decision Tree

The Odour Complaint Decision Tree is a high-level process. It can be customized for your organization.

An odour complaint will mean different things to different organizations depending on factors such as if the location is rural or urban and the types of local industry and activity.

- Organizations using this odour identification process will need to be aware of the local industries and natural or seasonal occurrences that may affect the volume and type of complaints. Please work with your local partners to create a list along with the types of odours commonly associated with their activities. This way, when a caller makes an odour complaint you can more easily direct them.
- For industry-specific organizations, this decision tree and form may be simplified to include odour information relevant to your organization. If your organization refers specific types of odours to different parts of your organization you may wish to add a flow that describes where these complaints are to be directed.
- Please keep in mind that you may receive calls about odours that are not due to your operations. You can use the decision tree to redirect the caller.
- Some organizations, such as municipalities, may have several possible sources for an odour.

Completing the Odour Complaint Call Log

Explain to the caller that you will be asking a couple of questions to better direct their call.

Identifying the location

Ask for the location where the caller noticed the odour. For example, if they are in a city, what neighbourhood? If they are rural, what town or part of the county/municipality?

Describing the odour

Give the caller the opportunity to describe the odour in their own words before offering a list of words for them to choose from. Phrases such as “It’s kind of like…” may indicate the caller is a little unsure and it may be helpful to offer them some comparison words to help narrow down the odour.

A wide range of odours have been included on the form. Organizations may choose to customize this list based on their location or industry.

Script:

Please describe the odour. What does it smell like? (Check all that apply)

<input type="checkbox"/> Chemical <input type="checkbox"/> Rubbery <input type="checkbox"/> Plastic <input type="checkbox"/> Solvent <input type="checkbox"/> Glue <input type="checkbox"/> Mothballs <input type="checkbox"/> Petroleum/ gasoline <input type="checkbox"/> Bleach <input type="checkbox"/> Acidic <input type="checkbox"/> Paint-like	<input type="checkbox"/> Earthy <input type="checkbox"/> Woody <input type="checkbox"/> Grassy <input type="checkbox"/> Hay <input type="checkbox"/> Musty <input type="checkbox"/> Mouldy	<input type="checkbox"/> Fermented <input type="checkbox"/> Fruity <input type="checkbox"/> Over ripened fruit <input type="checkbox"/> Citrus <input type="checkbox"/> Garbage <input type="checkbox"/> Nail polish	<input type="checkbox"/> Rancid <input type="checkbox"/> Sour milk <input type="checkbox"/> Sweet & sour <input type="checkbox"/> Vinegar <input type="checkbox"/> Yeast	<input type="checkbox"/> Rotten <input type="checkbox"/> Rotting vegetables/ cabbage <input type="checkbox"/> Skunk <input type="checkbox"/> Rotten eggs <input type="checkbox"/> Garlic/onion
<input type="checkbox"/> Burnt <input type="checkbox"/> Smoky <input type="checkbox"/> Coffee-like <input type="checkbox"/> Exhaust	<input type="checkbox"/> Soapy <input type="checkbox"/> Medicinal <input type="checkbox"/> Ammonia <input type="checkbox"/> Urine	<input type="checkbox"/> Fecal <input type="checkbox"/> Manure <input type="checkbox"/> Sewer	<input type="checkbox"/> Putrid <input type="checkbox"/> Dead animal <input type="checkbox"/> Decay	<input type="checkbox"/> Fishy
<input type="checkbox"/> Other (describe)				

Source of the odour

The caller may know where the odour is coming from, such as a specific plant or a particular lake.

Ask if they have contacted any other organizations about this odour. If yes, who?

Give them the option of reporting the odour directly to the organization and provide them with the name and contact information (if available). Explain that many organizations prefer to receive this information directly so that they can act more quickly to address the situation. If they don't wish to contact the organization directly, give them the number to the appropriate government agency.

Next Steps

If your organization is responsible for addressing the odour complaint, tell the caller you will forward their report to the appropriate investigator.

If you are referring the caller to another organization, provide the name and number of the appropriate organization based on the information collected on the Odour Complaint Call Log.

If you are unsure who should handle the investigation, provide the number for Alberta Environment and Sustainable Resource Development (1-800-222-6514).

Explain to the caller that they may be asked some of the same questions again. The organization they are being referred will have their own methods for collecting data.

Closing the loop

Thank the caller for reporting the odour.

Let them know that some odour complaints take time to resolve and they may not notice a difference immediately.

Appendix D: Public Handout

Reporting Odours in Your Community

If you are troubled by an odour in your community, do you know where to report it? Do you know how to describe it?

Before you call be sure you have the following information:

Location: Where you were when you noted the odour
Description: Words you would use to describe the odour
Frequency: Dates and times you noticed the odour
Duration: How long the odour was noticeable
Weather: Conditions when you noticed the odour

Here are some words used to describe odours. Which matches the odour you're reporting?

- | | | | | |
|---|------------------------------------|---|---------------------------------------|--|
| <input type="checkbox"/> Chemical | <input type="checkbox"/> Earthy | <input type="checkbox"/> Fermented | <input type="checkbox"/> Rancid | <input type="checkbox"/> Rotten |
| <input type="checkbox"/> Rubbery | <input type="checkbox"/> Woody | <input type="checkbox"/> Fruity | <input type="checkbox"/> Sour milk | <input type="checkbox"/> Rotting vegetables/cabbages |
| <input type="checkbox"/> Plastic | <input type="checkbox"/> Grassy | <input type="checkbox"/> Over ripened fruit | <input type="checkbox"/> Sweet & sour | <input type="checkbox"/> Skunk |
| <input type="checkbox"/> Solvent | <input type="checkbox"/> Hay | <input type="checkbox"/> Citrus | <input type="checkbox"/> Vinegar | <input type="checkbox"/> Rotten eggs |
| <input type="checkbox"/> Glue | <input type="checkbox"/> Musty | <input type="checkbox"/> Garbage | <input type="checkbox"/> Yeast | <input type="checkbox"/> Garlic/onion |
| <input type="checkbox"/> Mothballs | <input type="checkbox"/> Mouldy | <input type="checkbox"/> Nail polish | | |
| <input type="checkbox"/> Petroleum/gasoline | | | | |
| <input type="checkbox"/> Bleach | | | | |
| <input type="checkbox"/> Acidic | | | | |
| <input type="checkbox"/> Paint-like | | | | |
| <input type="checkbox"/> Burnt | <input type="checkbox"/> Soapy | <input type="checkbox"/> Fecal | <input type="checkbox"/> Putrid | <input type="checkbox"/> Fishy |
| <input type="checkbox"/> Smoky | <input type="checkbox"/> Medicinal | <input type="checkbox"/> Manure | <input type="checkbox"/> Dead animal | |
| <input type="checkbox"/> Coffee-like | <input type="checkbox"/> Ammonia | <input type="checkbox"/> Sewer | <input type="checkbox"/> Decay | |
| <input type="checkbox"/> Exhaust | <input type="checkbox"/> Urine | | | |

Where to call

If you smell natural gas (rotten eggs):

- In your home: Open windows and doors to let fresh air in. Leave immediately. Don't use electronics, light switches, motor vehicles or anything that could spark a fire. Once safely away call your gas company or 911.
- Outside: Leave the immediate area and call your gas company or 911.

For other odours, if you know the source, you can call the organization directly. This will help your complaint to be acted on more quickly. Or you can call one of the following provincial or municipal numbers:

- Alberta Energy Regulator (AER) – Oil and gas
1-800-222-6514
- Alberta Environment and Sustainable Resource Development (AESRD) – Environmental
1-800-222-6514
- Natural Resources Conservation Board (NRCB) – Agricultural
1-888-383-6722
- 311 Calgary or 311 Edmonton – Municipal



If at any time the odour is causing physical symptoms or illness, call:

- Your family doctor
- Health Link Alberta (1-866-408-5465)
- 911 (for emergencies only)

Pilot testing – Information for the public

Appendix E: Full Pilot – Feedback Form

CASA Odour Complaint Call Log and Decision Tree Pilot Testing Feedback Form

Please complete the feedback information in the call log table immediately after each call if possible. This will help you recall the information more clearly.

Please provide answers to the general feedback questions at any time during the pilot testing period.

Please type in your answers if possible. Add more rows if needed.

The pilot ends on December 12, 2014. Please email this feedback form to:

Lori Weltz

yellowdogcommunications@shaw.ca

Organization name:
Number of odour complaint calls received during the pilot period:

Call log feedback:

Call date	Did you use the complaint call log to gather information? (yes/no) If no, why not?	Where did you refer the complaint? (Inside your organization/ another organization)	Feedback on call log and process (Please provide comments about this specific call. Did the call log/decision tree help you get the information you need? Were you able to make a proper referral?)

Call date	Did you use the complaint call log to gather information? (yes/no) If no, why not?	Where did you refer the complaint? (Inside your organization/ another organization)	Feedback on call log and process (Please provide comments about this specific call. Did the call log/decision tree help you get the information you need? Were you able to make a proper referral?)

General feedback:

<p>Did you customize the call log or decision tree? If so, how?</p>
<p>Is there information in the decision tree, reference guide or call log that requires more clarification?</p>
<p>Please provide any general feedback that will help us improve the call log and/or the process to appropriately direct odour complaints.</p>
<p>Please review the public handout information and provide any feedback on the content.</p>

Appendix F: Limited Pilot – Feedback Form

CASA Odour Complaint Call Log and Decision Tree Feedback Form

Thank you for agreeing to review CASA's draft materials. Please remember, this process is intended to help operators direct odour complaint callers. This is not the comprehensive information that would need to be gathered by the organization responsible for investigating an odour complaint. Our goal is to help operators collect just enough information to correctly direct the caller and to reduce the amount of information the caller would have to repeat once they reach the correct organization.

Please provide your feedback by November 28 if possible.

Please email this feedback form to:

Lori Wertz
yellowdogcommunications@shaw.ca

Reviewer name/organization (Individuals' names will not be used in the feedback report provided to CASA):

Comments:

In your opinion, will the decision tree help an operator to direct a caller to the correct organization? Why or why not?
--

Keeping in mind that this process is intended to gather information for call referral, not investigation, does the call log collect enough information? If not, what other information would be useful.

Is there information in the decision tree, reference guide or call log that requires more clarification?
--

Please provide any general feedback that will help us improve the decision tree, call log and reference guide.
--

Please review the public handout information and provide any feedback on the content.

Other comments:
