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What additional questions do you have after attending/watching the Odor Management Rulemaking webinar?

No question just comments on the proposed approach and odor levels recommendations. But first of all, wanted to congratulate MPCA to take initiative to come with odor management plan document. Good step. Yes, complaints are the reason to target odor management plan but odor management plan should be based on odor science and not just “no odor complaints” criteria.

What odors do you experience in your community? What odors concern you?

We are engineering and odor science consultants so have seen all kind of odors from industrial, commercial operations

How has odor affected your life? How do you deal with odor issues right now?

Odor is a nuisance issue. It is not health concern issue. In my opinion both should be kept separate. Odor control plan should be purely focused on odor science and not health issue. There are several other agencies and regulation for health issue and this odor management plan criteria should be purely based on odor nuisance criteria. Mixing them will create confusion and will defeat the purpose of this plan.

What outcomes would you like to see from the Odor Management Rule?

Industry should be able to install state-of-art technology for its operation to keep average citizen with normal sense of smell to live in a nuisance free environment. Objective should not be to have industry install control beyond state of the art to just protect the most sensitive olfactory capabilities person. That would negatively impact community development plan because industries will shy away from area. In addition, very aggressive odor standards will generate lots of class action lawsuits and in my opinion that would not be a good outcome.

When does an odor become objectionable for you?

I think D/T over 4 being objectionable is more reasonable. D/T of 2 will generate lots of false positive odor nuisance cases and lots of class action lawsuits. MPCA's resources will be wasted. Even California uses D/T of 5 as nuisance criteria. Papers publish by some authors state than generally for less than 5 level, one does not see complaints. May be few sensitive people but the like all air pollution regulation focus should be for average not the most sensitive. Some acceptable level of risk is always required for a balance between the industry, community, and economical growth.



1. D/T of 2 is too aggressive and not necessary. D/T of 4 or above is reasonable.
2. Odor control plan should stay away from health concerns. There are other agencies and regulations address those. When you have odor issue address odors and if health concerns come up reference them other agency for those. Objective of this plan is to reduce odor impact, period.
3. Odor plan states exempt sources. Why exempt? What about their neighboring community? What about synergistic impact by 2/3/or 4 nearby sources. One may say well combined impact from wastewater/my facility causes nuisance but wastewater is exempt so my fault? Too many legal issues. I was involved in one legal case when judge was having difficulty with different odor standards for different industries. He thought whether it was violating equal/ fair protections. I am not a lawyer, but MPCA may want to look into it further for exempt sources. Why only them?