Rumpke Sanitary Landfill
Odor Complaint Hotline Summary/Analysis
2014

Hamilton County Public Health
Department of Environmental Health Services
Waste Management Division

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Introduction
The following summarizes odor complaints received and odor surveillance activities during 2014 related to Rumpke Sanitary Landfill located at 10795 Hughes Road in Colerain Township.

Beginning in 2007, Hamilton County Public Health (HCPH) partnered with Rumpke and Southwest Ohio Air Quality Agency (Air Quality) to respond to citizen complaints 24/7. Since 2007, HCPH has compiled odor complaint data into periodic reports. The intent of these reports is to summarize and analyze the complex issue of odors and odor complaints at Rumpke Sanitary Landfill.

The subsurface heating event affecting the north end of the facility (Phase 5) created unique challenges for the facility to strictly control odors beginning in 2009. Continued analysis of the data is valuable in measuring the effectiveness of odor control efforts undertaken by the facility.

New since 2013, HCPH has used mobile devices to capture complaint investigation data. This was necessitated by the high incidence of odor complaints beginning in the fourth quarter of 2009 through current. Electronic data capture eliminates the need to perform data entry of paper records allowing staff more time for field responses and odor surveillance. Utilizing GPS-enabled mobile devices, geospatial data is now collected alongside the observations allowing for better mapping capability.

In addition to complaint response, HCPH conducts odor surveillance monitoring of the facility in accordance with Ohio EPA Internal Operating Procedure and Odor Scale outlined below (Figure 1). A surveillance loop has been established based on complaint locations from 2013 (Figure 2). This route includes major roadways surrounding the facility through residential areas. An assessment of odor is made at all points along this loop, however only incidences of landfill-related odor and complaint locations are recorded. The assumption can be made that if the surveillance loop was performed, no landfill-related odors were noted at all points along that route except where noted. Each record in the dataset is either a complaint location, a location where landfill-related odor was noted by the investigator, or a record that no odor was noted along the surveillance route.

Every complaint continues to be relayed to Rumpke for investigation – results of Rumpke’s investigation are not currently included in this latest dataset. Only HCPH investigation results are being recorded. Also, in order to streamline data capture and analysis, complaints are logged and tracked separately from the investigation or field responses.
**Figure 1**  

<table>
<thead>
<tr>
<th><strong>Odor Scale</strong></th>
</tr>
</thead>
</table>
| No Odor          | Odor not detectable  
| Slight           | Odor present in the air, which activates the sense of smell and the characteristics may or may not be distinguishable and/or definite, but not objectionable in short durations. This is characterized by occasional “whiffs” of odor, but is not persistent.  
| Moderate         | Odor present in the air, which easily activates the sense of smell, is very distinct and clearly distinguishable, tends to be objectionable and/or irritating, and is persistent in the community.  
| Strong           | Odor present in the air, which is objectionable and causes a person to attempt to avoid it completely.  
| Over-Powering    | Odor present in the air, which is so strong that it is overpowering and intolerable for any length of time.  

*Increments have been added to allow description of odor between the criteria described above (No Odor to Slight, Slight to Moderate, etc.).  

**Figure 2**  

![Cincinnati Area GIS Map](image-url)
In 2014, 223 complaints from 66 named complainants were received regarding odor from Rumpke Sanitary Landfill. This is a substantial reduction from the past 4 years and from a peak in 2011 of 566 complaints and up to 266 different named complainants in 2010. A small fraction of the complaints are anonymous at 7% continuing a downward trend since 2012. Rumpke utilizes deodorizer as part of the odor control plan. Some residents have complained about the use of this deodorizer. In 70 of these complaints (31%), the complainant described the offending odor as involving the use of deodorizer. This is up from 22% in 2013.

The response/surveillance dataset contains 420 observations or records. 223 records are in response to complaints. 127 of these records were non-complaint locations where landfill odors were observed along a predefined surveillance route. 70 records are from surveillance activities where no off-site odors were noted along the surveillance route. Deodorizer was noted in 14% of the 420 observations.

<table>
<thead>
<tr>
<th>Complaint Location</th>
<th>Odor Intensity (No Odor - Moderate to Strong)</th>
<th>Total</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>No Odor</td>
<td>No Odor to Slight</td>
<td>Slight</td>
</tr>
<tr>
<td></td>
<td>70</td>
<td>81</td>
<td>44</td>
</tr>
<tr>
<td>Yes</td>
<td>176</td>
<td>18</td>
<td>27</td>
</tr>
<tr>
<td>Grand Total</td>
<td>246</td>
<td>100</td>
<td>71</td>
</tr>
</tbody>
</table>

The response/surveillance dataset contains 420 observations or records. 223 records are in response to complaints. 127 of these records were non-complaint locations where landfill odors were observed along a predefined surveillance route. 70 records are from surveillance activities where no off-site odors were noted along the surveillance route. Deodorizer was noted in 14% of the 420 observations.

<table>
<thead>
<tr>
<th>Deodorizer Observed</th>
<th>Odor Intensity (No Odor - Moderate to Strong)</th>
<th>Total</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>No Odor</td>
<td>No Odor to Slight</td>
<td>Slight</td>
</tr>
<tr>
<td></td>
<td>233</td>
<td>73</td>
<td>53</td>
</tr>
<tr>
<td>Yes</td>
<td>13</td>
<td>27</td>
<td>18</td>
</tr>
<tr>
<td>Grand Total</td>
<td>246</td>
<td>100</td>
<td>71</td>
</tr>
</tbody>
</table>
With increased capabilities in data capture and better presence at and near the landfill to assess odor, new indices are possible since 2013. The performance indices: % Days with Odor Noted and % Days with Intensity Described as Greater than Slight, were developed in 2013. In 2014, there has been an improvement in both of these indices with % of Days with Odor Noted dropping from 70% to 65% and in % of Intensity Described as Greater than Slight dropping from 3% to 1%

39% of the complaints were at the caller’s residence in 2014, down from the previous 6 years. 21% of all complaints were confirmed at the complainant’s location up from 16% in 2013. The majority (59%) of off-site odors continue to be phase 5 reaction or gas odors. The average percent of complaints responded to within one hour in 2013 and 2014 is 21 percent. This is down from an average of 86 percent over the prior five years (2012-2008) due to the fact that Rumpke response data is no longer included in the dataset. There has been no change in relay of, and response to, complaints by Rumpke, so true response time is assumed to be similar to years past. 52% of the complaints were witnessed by HCPH within 4 hours of receiving the complaint in 2014.

Over the past 8 years, peak odor complaints were experienced in 2011, with 566 complaints. In 2014, there were nearly half the complaints per year than in the previous 4 years. Short-term is trending downward from the peak of 566 in 2011. The following timeline graph indicates one possible influencing factor in number of complaints in 2014 - a public hearing was held on July 21, 2014, concerning possible settlement of a court case involving zoning for a proposed landfill expansion.
The timeline graph reveals some possible influencing factors in the peaks and valleys of complaints.
Maps
Three maps are included as an attachment to this report.

1. Complaint Locations – 223 complaint locations in 2014 with color indicating type of odor and number tag indicating description of intensity.
2. Confirmed Complaint Locations – confirmed complaint locations in 2014 with color indicating type of odor and number tag indicating description of intensity.
3. All Confirmed Odor Locations - with color indicating type of odor and number tag indicating description of intensity.

Summary:
In 2014, there was significant improvement in the odor situation at Rumpke Sanitary Landfill. The sub-surface event occurring in the north end of the landfill contributed to offsite odors beginning as early as September 2009 and continues to be the source for the majority of off-site odor occurrences. A comprehensive action plan to address odors and return operations to normal in the affected area continues to be implemented. A formal Odor Control Management Plan addressing the affected area and other sources of odor from the landfill continues to be utilized by the facility.

Rumpke has attempted to address odors from the reaction with application and rework of clay soils, plastic Odor Control Blanket (OCB), increasing flare capacity, eliminating odorous leachate from residential sewers, and numerous odor neutralizing systems (deodorizers). Most recent efforts have centered on eliminating protrusions from the OCB where possible and deploying an improved OCB with an odor impermeable membrane (EVOH – Ethyl Vinyl Alcohol). The area covered by EVOH type OCB is up to approximately 22 acres.

Hamilton County Public Health continues to work with Rumpke personnel and other agencies to identify measures to minimize the occurrence of off-site odors as much as possible. Additional efforts and odor control technologies continue to be evaluated to better target identified odor sources.

Unannounced inspections and odor surveillance continue in order to monitor the facility during all complaint times.

The 24-Hour Odor Complaint Hotline and complaint response continues to allow for the rapid investigation of odor complaints associated with Rumpke Sanitary Landfill.
2014 Complaint Locations

Intensity Code
0 = No Odor Noted
0.5 = No Odor to Slight
1 = Slight
1.5 = Slight to Moderate

Type of Odor
- Garbage / Working Face
- Landfill Related Odor
- Phase 5 Reaction Odor

Center: 39.276752, -84.561239
2014 Confirmed Complaint Locations

Intensity Code
0 = No Odor Noted
0.5 = No Odor to Slight
1 = Slight
1.5 = Slight to Moderate

Type of Odor
Garbage/Waste
Feces/Septic
Sewage/Wastewater

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Intensity Code
0 = No Odor Noted
0.5 = No Odor to Slight
1 = Slight
1.5 = Slight to Moderate

Type of Odor
Garbage - Working Face
Mixed
Mixed & Reaction Odor

2014 All Confirmed Odor Locations
<table>
<thead>
<tr>
<th>Facility Name</th>
<th>Investigator Representing Weather</th>
<th>Precipitation</th>
<th>Direction</th>
<th>Wind Speed</th>
<th>Temperature</th>
<th>Relative Humidity</th>
<th>Type of Odor</th>
<th>Odor Intensity</th>
<th>Description</th>
<th>Time of Investigation</th>
<th>Deodorizer</th>
<th>Comments and Corrective Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rumpke Facility Landfill</td>
<td>Tony DeJonckheere</td>
<td>Overcast</td>
<td>None</td>
<td>1-5 mph</td>
<td>West</td>
<td>270</td>
<td>20</td>
<td>87</td>
<td>29.06</td>
<td>Surveillance Loop</td>
<td>39.271289 -84.58097</td>
<td>Stout Rd</td>
</tr>
<tr>
<td>Rumpke Facility Landfill</td>
<td>Tony DeJonckheere</td>
<td>Snow</td>
<td>None</td>
<td>5-15 mph</td>
<td>North</td>
<td>0/360</td>
<td>15</td>
<td>91</td>
<td>28.7</td>
<td>Surveillance Loop</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Rumpke Facility Landfill</td>
<td>Tony DeJonckheere</td>
<td>Overcast</td>
<td>None</td>
<td>1-5 mph</td>
<td>West</td>
<td>270</td>
<td>20</td>
<td>87</td>
<td>29.08</td>
<td>Surveillance Loop</td>
<td>39.274232 -84.57353</td>
<td>Pippin north of Stout</td>
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<tr>
<td>Rumpke Facility Landfill</td>
<td>Nick Siefker</td>
<td>Clear</td>
<td>None</td>
<td>5-15 mph</td>
<td>Southwest</td>
<td>225</td>
<td>21</td>
<td>78</td>
<td>29.2</td>
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<td>No</td>
<td>No</td>
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<tr>
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<td>None</td>
<td>1-5 mph</td>
<td>Northeast</td>
<td>45</td>
<td>18</td>
<td>71</td>
<td>29.3</td>
<td>Surveillance Loop</td>
<td>No</td>
<td>No</td>
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<tr>
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<td>Clear</td>
<td>None</td>
<td>5-15 mph</td>
<td>West</td>
<td>270</td>
<td>42</td>
<td>78</td>
<td>28.8</td>
<td>Surveillance Loop</td>
<td>39.303402 -84.600297</td>
<td>192.516514</td>
</tr>
<tr>
<td>Rumpke Facility Landfill</td>
<td>Nick Siefker</td>
<td>Clear</td>
<td>None</td>
<td>5-15 mph</td>
<td>West</td>
<td>270</td>
<td>42</td>
<td>78</td>
<td>28.8</td>
<td>Surveillance Loop</td>
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<tr>
<td>Rumpke Facility Landfill</td>
<td>Nick Siefker</td>
<td>Clear</td>
<td>None</td>
<td>1-5 mph</td>
<td>Northeast</td>
<td>45</td>
<td>26</td>
<td>83</td>
<td>29.16</td>
<td>Surveillance Loop</td>
<td>39.260242 -84.594877</td>
<td>I275 W south of Rumpke</td>
</tr>
<tr>
<td>Rumpke Facility Landfill</td>
<td>Nick Siefker</td>
<td>Clear</td>
<td>None</td>
<td>5-15 mph</td>
<td>Northeast</td>
<td>45</td>
<td>26</td>
<td>83</td>
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<td>29.16</td>
<td>Surveillance Loop</td>
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<td>Rumpke Facility Landfill</td>
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<td>5-15 mph</td>
<td>Northeast</td>
<td>45</td>
<td>26</td>
<td>83</td>
<td>29.16</td>
<td>Surveillance Loop</td>
<td>39.260242 -84.594877</td>
<td>I275 W south of Rumpke</td>
</tr>
</tbody>
</table>
1-5 mph Southwest 225 61 93 28.6 Surveillance Loop 39.298261 -84.589558 212.665562 3460 Kemper No Phase 5 Reaction Odor NO ODOR to SLIGHT 0.5

Nick Siefker
Overcast None 5-15 mph West 270 33 63 28.9 Surveillance Loop No No Landfill Related Odor NO ODOR 0

No
Yes Less than 1 hour No Landfill Related Odor NO ODOR 0

Squirrelsnest ln
No
Nick Siefker

HCPH Overcast Rain 15 mph - higher Southwest 225 61 95 28.59 Surveillance Loop 39.253277 -84.590521 269.85001 Loralinda Dr @ Springdale Rd Yes over 48 hours No Landfill Related Odor NO ODOR 0

HCPH Overcast None 5-15 mph East 90 58 77 28.96

No
No

HCPH Overcast None 5-15 mph East 90 58 77 28.96

Nick Siefker
Clear None 15 mph - higher West 270 68 48 28.8 Surveillance Loop 39.288293 -84.571417 262.873203 Greenbrook @ Pippin No Phase 5 Reaction Odor NO ODOR to SLIGHT 0.5

Overcast Rain 5-15 mph East 90 48 99 28.6 Surveillance Loop 39.274532 -84.608835 278.449619 10741 Old Colerain No Phase 5 Reaction Odor SLIGHT 1

39.26973 -84.607444 285.299534

No

HCPH Overcast None 5-15 mph Southwest 225 57 99 28.55 Surveillance Loop 39.294264 -84.595413 234.923985 11643 Bank Rd Yes Less than 1 hour No Landfill Related Odor NO ODOR 0
<table>
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<tr>
<th>Date</th>
<th>Location</th>
<th>Direction</th>
<th>Speed</th>
<th>Temperature</th>
<th>Humidity</th>
<th>Wind Speed</th>
<th>Wind Gust</th>
<th>Comments</th>
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</thead>
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<tr>
<td>07/31/2014</td>
<td>Rumpke Sanitary Landfill</td>
<td>West 270</td>
<td>63 84</td>
<td>07/31/2014 11:31:58 AM</td>
<td>Cloudy</td>
<td>5-15 mph</td>
<td>Less than 1 hour</td>
<td>No Landfill Related Odor NO ODOR 0</td>
</tr>
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<td>07/31/2014</td>
<td>Rumpke Sanitary Landfill</td>
<td>West 270</td>
<td>63 84</td>
<td>07/30/2014 08:54:52 AM</td>
<td>Partly Cloudy</td>
<td>1-5 mph</td>
<td>Garbage - Working Face SLIGHT 1</td>
<td></td>
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<td>07/28/2014</td>
<td>Rumpke Sanitary Landfill</td>
<td>West 270</td>
<td>63 84</td>
<td>07/27/2014 08:41:58 AM</td>
<td>Partly Cloudy</td>
<td>1-5 mph</td>
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<tr>
<td>07/24/2014</td>
<td>Rumpke Sanitary Landfill</td>
<td>West 270</td>
<td>63 84</td>
<td>07/23/2014 08:46:59 AM</td>
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<td>5-15 mph</td>
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<td>07/22/2014</td>
<td>Rumpke Sanitary Landfill</td>
<td>West 270</td>
<td>63 84</td>
<td>07/21/2014 07:25:03 AM</td>
<td>Cloudy</td>
<td>5-15 mph</td>
<td>Garbage - Working Face SLIGHT 1</td>
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<tr>
<td>07/21/2014</td>
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<td>63 84</td>
<td>07/21/2014 07:13:28 AM</td>
<td>Cloudy</td>
<td>5-15 mph</td>
<td>Garbage - Working Face SLIGHT 1</td>
<td></td>
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<tr>
<td>07/21/2014</td>
<td>Rumpke Sanitary Landfill</td>
<td>West 270</td>
<td>63 84</td>
<td>07/21/2014 07:20:00 AM</td>
<td>Cloudy</td>
<td>5-15 mph</td>
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<td>07/21/2014</td>
<td>Rumpke Sanitary Landfill</td>
<td>West 270</td>
<td>63 84</td>
<td>07/20/2014 07:42:08 AM</td>
<td>Partly Cloudy</td>
<td>5-15 mph</td>
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<tr>
<td>07/17/2014</td>
<td>Rumpke Sanitary Landfill</td>
<td>West 270</td>
<td>63 84</td>
<td>07/17/2014 08:46:59 AM</td>
<td>Cloudy</td>
<td>5-15 mph</td>
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<td>07/17/2014</td>
<td>Rumpke Sanitary Landfill</td>
<td>West 270</td>
<td>63 84</td>
<td>07/17/2014 08:19:30 AM</td>
<td>Partly Cloudy</td>
<td>5-15 mph</td>
<td>Garbage - Working Face SLIGHT 1</td>
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<tr>
<td>07/17/2014</td>
<td>Rumpke Sanitary Landfill</td>
<td>West 270</td>
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<td>07/17/2014 08:46:59 AM</td>
<td>Cloudy</td>
<td>5-15 mph</td>
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<td>07/17/2014</td>
<td>Rumpke Sanitary Landfill</td>
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<td>Partly Cloudy</td>
<td>5-15 mph</td>
<td>Garbage - Working Face SLIGHT 1</td>
<td></td>
</tr>
</tbody>
</table>

**Response:** Based on surveillance completed prior to the complaint.
Overcast Rain 5-15 mph East 90 70 82 28.9 Surveillance Loop 39.281868 -84.613328 266.209385 11104 Old Colerain No Phase 5 Reaction Odor SLIGHT 1

No odors noted. Surveillance initiated at 13:45.

Overcast Rain 5-15 mph East 90 70 82 28.9 Surveillance Loop 39.269845 -84.607451 284.87656 Near 10569 Old Colerain Yes 4 to 24 hours Garbage - Working Face SLIGHT 1

1-5 mph North 0/360 80 84 29.0 Surveillance Loop 39.25678 -84.59484 267.8 3548 Bevis Yes 1 to 4 hours Garbage - Working Face NO ODOR to SLIGHT 0.5

Clear None 5-15 mph East 90 67 80 29.0 Surveillance Loop 39.257234 -84.607067 270.341648 4238 Intrepid Yes Less than 1 hour No Landfill Related Odor NO ODOR 0

Clear None 1-5 mph East 90 61 86 29.1 Surveillance Loop 39.256801 -84.604609 263.1 3820 Enterprise Yes 1 to 4 hours No Landfill Related Odor NO ODOR 0

Clear None 1-5 mph Southwest 225 76 89 29.04 Surveillance Loop 39.289268 -84.616199 247.2 No 24 to 48 hours No Landfill Related Odor NO ODOR 0

Clear None 5-15 mph Northeast 45 64 76 29.0 Surveillance Loop 39.256574 -84.608596 269.0 10057 Voyager Yes 1 to 4 hours No Landfill Related Odor NO ODOR 0

Clear None 1-5 mph Southwest 225 79 92 28.98 Surveillance Loop 39.25817 -84.601529 267.3 Colerain exit of I-275 Yes over 48 hours No Landfill Related Odor NO ODOR 0

Clear None 5-15 mph Northeast 45 68 76 29.0 Surveillance Loop 39.277902 -84.611215 271.9 10885 Old Colerain No Phase 5 Reaction Odor NO ODOR to SLIGHT 0.5

Intermittent.

Clear None 1-5 mph Northeast 45 73 71 28.9 Surveillance Loop No No Landfill Related Odor NO ODOR 0

Clear None 1-5 mph East 90 76 81 28.99 Surveillance Loop 39.260411 -84.598354 264.8 Walmart 10240 Colerain ave Yes 4 to 24 hours No Landfill Related Odor NO ODOR 0

Partly Cloudy None 1-5 mph Northeast 45 70 74 28.9 Surveillance Loop 39.259822 -84.602518 274.266575 Colerain Avenue Yes 24 to 48 hours Garbage - Working Face SLIGHT 1

1-5 mph Northeast 45 71 70 28.9 Surveillance Loop No No Landfill Related Odor NO ODOR 0

None None None None None 0
No odor at complaint location. Asphalt and food odor at Lowes.

Overcast None 1-5 mph South 180 54 81 29.1 Surveillance Loop 39.304206 -84.580739 244.2 Dalmellington Ct. Yes Less than 1 hour Phase 5 Reaction Odor NO ODOR to SLIGHT 0.5

Nick Siefker

Clear None 5-15 mph East 90 56 82 29.24 Surveillance Loop 39.273292 -84.608056 277.3 10600 block of Old Colerain No Garbage - Working Face NO ODOR to SLIGHT 0.5

Overcast None 5-15 mph Northwest 315 36 97 29.0 Surveillance Loop 39.256789 -84.594834 267.0 3548 Bevis Yes 1 to 4 hours No Landfill Related Odor NO ODOR 0

Surveillance started at approximately 12:25 pm

5-15 mph Southeast 135 70 93 28.9 Surveillance Loop 39.295833 -84.608207 216.6 4680 Kemper No Phase 5 Reaction Odor NO ODOR to SLIGHT 0.5

No odor noted. Surveillance initiated at 2pm.

Overcast None 5-15 mph North 0/360 37 94 29.2 Surveillance Loop 39.256914 -84.594834 265.9 Bevis No Garbage - Working Face SLIGHT 1

None

Intermittent light garbage and/or deodorizer

Nick Siefker

Overcast None 5-15 mph Northeast 45 65 89 28.9 Surveillance Loop 39.27014 -84.607417 283.8 10587 Old Colerain No Phase 5 Reaction Odor SLIGHT 1

No

No landfill odors noted. Surveillance initiaed at 12:30pm.

Clear None 5-15 mph Northeast 45 65 89 28.9 Surveillance Loop 39.27014 -84.607417 283.8 10587 Old Colerain No Phase 5 Reaction Odor SLIGHT 1

No

No odors noted. Surveillance initiated at 11:56 am.

Clear None 5-15 mph Northwest 315 26 76 29.1 Surveillance Loop No No Landfill Related Odor NO ODOR 0

No

No odors noted. Surveillance started at 12:47 pm

Clear None 5-15 mph Northwest 315 36 97 29.0 Surveillance Loop 39.256789 -84.594834 267.0 3548 Bevis Yes 1 to 4 hours No Landfill Related Odor NO ODOR 0

Surveillance initiated at approximately 10:45 am

Yes

Intermittent light garbage and/or deodorizer

Nick Siefker

Overcast None 5-15 mph Northwest 315 69 80 28.91 Surveillance Loop 39.260576 -84.589419 270.6 Pottinger @ Storm No Phase 5 Reaction Odor NO ODOR to SLIGHT 0.5

None

Nick Siefker

Overcast None 5-15 mph Northwest 315 26 76 29.1 Surveillance Loop No No Landfill Related Odor NO ODOR 0

No

No odors noted. Surveillance initiated at 11:56 am.

Clear None 5-15 mph Northeast 45 65 89 28.9 Surveillance Loop 39.27014 -84.607417 283.8 10587 Old Colerain No Phase 5 Reaction Odor SLIGHT 1

No
No landfill odors noted. Surveillance initiated at 11:45am.

No landfill odors noted. Surveillance initiated at 1:30pm.

No landfill odors noted. Surveillance initiated at 9:45am.

Surveillance started at approximately 5:00 pm. Winds were nearly calm and variable in direction, but generally from the north.

No landfill odors noted. Surveillance initiated at 12:00pm.

No landfill odors noted. Surveillance initiated at 11:00am.

No landfill odors noted. Surveillance initiated at 11:00am.

No landfill odors noted. Surveillance initiated at 11:00am.

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No landfill odors noted. Surveillance initiated at 11:00am.