RENDERING FACILITIES
AND GENERAL INDUSTRIAL FACILITIES
SOUTHEAST LOS ANGELES CSC MEETING AND WORKSHOP #6
SEPTEMBER 17, 2020

Dianne Sanchez, Ph.D. - Air Quality Specialist
CERP AND CAMP TIMELINE

- Kickoff Meeting
  - January 2020
  - February 2020

- Technical Advisory Group (TAG) Meeting
  - June 2020
  - July 2020

- Truck Traffic and Freeways
  - Rail Yards and Locomotives
  - September 2020
  - October 2020

- Rendering Facilities
  - General Industrial Facilities

- Metal Processing Facilities
  - Green Spaces

- Discussion Draft CERP and CAMP

- Overview of CERP and CAMP Development Process (e.g., CARB Blueprint Training)

- CSC Membership
- Finalize Community Boundary
- Finalize Emissions Study Area
- Identify Air Quality Priorities
AIR QUALITY PRIORITY – RENDERING FACILITIES
• CSC members identified rendering facilities as a top air quality priority
• Community members expressed general concerns about noxious odors, especially around schools
Rendering is a process that converts waste animal tissue into grease, soap and other materials.

Dry material from the process may be used for pet food, fertilizer, and other products.

The rendering process can cause odors.

Strong odors can cause coughing, sore throat, nausea, etc.

South Coast AQMD Rule 415 was adopted in November 2017 to reduce odors from rendering facilities.
Best Management Practices

- Cover trucks
- Limit holding time for materials
- Wash down requirements
- Repair pavement

Permanent Enclosure or Closed System for Operations

- Applies to receiving area, processing equipment, and wastewater
- 2.5 to 3.5 years to design, permit and construct

Signage

- Contact 1-800-CUT-SMOG and facility
- Inform community in English and Spanish

Additional Requirements

- Triggered if odor issues continue
- Facility required to do a specific cause analysis for odor events

To Report Odors Call the South Coast Air Quality Management District at 1-800-CUT-SMOG or Facility Contact at 1-555-555-5555
OFFICE OF COMPLIANCE & ENFORCEMENT

RENDERING

HUGH HENNEY
Air Quality Analysis and Compliance Supervisor
Major Sources
RENDERING – 5 PLANTS

- Darling Ingredients
- Baker Commodities
- Smithfield Packaged Meat ("Farmer John’s")
- Legacy By-Products (Previously D & D /West Coast Rendering)
- Coast Packing
TWO KEY RULES FOR ENFORCEMENT

Rule 415 – Odors from Rendering Facilities
- Requires Best Management Practices (BMPs) to reduce/control odors
- Requires signage for the public
- Thresholds and requirements for an “Odor Event”

Rule 402 – Public Nuisances
- The regulation cited for any air pollution concern, including odors, that is negatively affecting a considerable number of the people or the public
PUBLIC COMPLAINTS

- **1-800-CUT-SMOG (1-800-288-7664) or online** [www.aqmd.gov](http://www.aqmd.gov)
- Live attendant during business hours (Monday-Friday) or to our standby system off-hours
- Types of complaints: odors
- Complainant information = confidential
- Complaints can be made anonymously
- **INSPECTORS RESPOND TO ALL COMPLAINTS**
COMPLAINTS RECEIVED IN SELA

2019 Rendering Complaints Received in SELA
HOW DO WE INSPECT?

- Verify equipment and permit conditions
- Enforce Rule 415
  - Compliance with all BMPs, including:
    - Hold time of raw materials (4 hours or less)
    - Housekeeping/washing procedures for handling areas, trucks, containers, and drains
    - Maintain unloading area free of standing water
  - Compliance with Permanent Total Enclosure (PTE) construction timeline:
    - Wastewater area: 12 months after Permit to Construct issued
    - Raw material/processing area: 24 months after Permit to Construct issued
## PERMITTING PROGRESS

<table>
<thead>
<tr>
<th>Facility</th>
<th>Permit to Construct Issue Date</th>
<th>Wastewater Area</th>
<th>Raw Material Receiving Area</th>
<th>Raw Material Grinding and Cooking Operations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Darling Ingredients</td>
<td>8/8/2019</td>
<td>N/A – No Treatment</td>
<td>8/7/2020 &amp; 8/7/2021 (Completed)</td>
<td></td>
</tr>
<tr>
<td>Baker Commodities</td>
<td>3/10/2020 &amp; 4/30/2020</td>
<td>Request for up to 12 month Extension Under Evaluation</td>
<td>24 months from PC (April 2022)</td>
<td></td>
</tr>
<tr>
<td>Smithfield Packaged Meat (formerly Farmer John's)</td>
<td>Under Evaluation</td>
<td>12 months from PC issuance</td>
<td>24 months from PC (likely 2022)</td>
<td></td>
</tr>
<tr>
<td>Legacy By-Products (previously D&amp;D/West Coast Rendering)</td>
<td>Under Evaluation</td>
<td>12 months from PC issuance</td>
<td>24 months from PC (likely 2022)</td>
<td></td>
</tr>
<tr>
<td>Coast Packing</td>
<td>N/A - Exempt from Rule 415(d)(1)(3) enclosure/control system requirements per Rule 415(l)(3).</td>
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<td></td>
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</tbody>
</table>
## ENFORCEMENT ACTIONS (NOVs)

<table>
<thead>
<tr>
<th>Facility</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baker Commodities</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>D&amp;D/West Coast Rendering (Legacy By-Products)</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>Darling Ingredients</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Smithfield Packaged Meat</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Coast Packing</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>10</strong></td>
<td><strong>1</strong></td>
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</table>
Odor Event = 3 or more verified odor complaints from different individuals

Specific Cause Analysis = A process required for a facility to investigate the cause of a confirmed odor event and identify corrective measures previously taken, needed, or to be taken to prevent recurrence of a similar event.

Odor Mitigation Plan required if:
1. NOV for Public Nuisance related to rendering odors under Rule 402, or
2. 3 or more odor events in 180 days
QUESTIONS?
CAMP DEVELOPMENT
RENDERING FACILITIES

PAYAM PAKBIN, PHD
PROGRAM SUPERVISOR
Several steps that are part of the rendering process can emit odors. Odor nuisances from rendering facilities in Vernon can impact the quality of life of individuals living in Southeast Los Angeles.
WHAT HAS BEEN DONE SO FAR?

South Coast AQMD evaluated the performance of a new specialized air monitor operated by a contractor.

As part of this evaluation, mobile monitoring was conducted around all five rendering facilities.

South Coast AQMD is currently in the process of developing its own mobile laboratory.
## AIR MONITORING CHALLENGES AND LIMITATIONS

### Detection of odorous compounds

- Plumes consist of a complex mix of particle and gaseous pollutants
- Most of these compounds can cause odors at very low concentrations
- Often, the human nose can detect odors better than the most sophisticated air measurement equipment

### Identification of the emission source(s)

- Difficult to identify which facility is the main source of odors because of:
  - Proximity of the rendering plants
  - Variable wind conditions in the area
Target Air Pollutants
- VOCs, odorous compounds

Purpose of Air Monitoring
- To assess how emissions from rendering facilities may impact air quality in nearby communities

Air Monitoring Solution
- Mass Spectrometer Mobile Laboratory
  - Proof of concept conducted in collaboration with Aerodyne Research

South Coast AQMD’s mobile laboratory is currently under development
- Chapter 5e, Action 1

<table>
<thead>
<tr>
<th>Monitoring Activity</th>
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<tbody>
<tr>
<td>Conduct mobile monitoring for volatile organic compounds (VOCs) and other odorous</td>
</tr>
<tr>
<td>compounds</td>
</tr>
<tr>
<td>Conduct mobile monitoring near each of the five facilities</td>
</tr>
<tr>
<td>Make monitoring data publicly available</td>
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</tbody>
</table>
DISCUSSION

- What other factors should be considered?
- Comments, Questions, Concerns?

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Angela Haar
ahaar@aqmd.gov
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### Rendering Facilities – Potential CERP Policies

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<tr>
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<tbody>
<tr>
<td></td>
<td>• Conduct mobile air measurements for volatile organic compounds (VOCs) near each rendering facility in the community and make air monitoring data publicly available</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Engage in and provide information for the community on Rule 415 requirements, which address odors from rendering facilities</td>
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</tbody>
</table>
|   | • Conduct facility inspections to evaluate compliance with Rule 415, and follow-up with enforcement action, where appropriate  
• Make referrals to other regulatory agencies and local health department, as appropriate |   |
COMMENTS AND QUESTIONS?
• CSC members identified general industrial facilities as a top air quality priority

• Community members expressed general concerns about emissions of solvents, fugitive dust, best available control technology, facility permitting, and air monitoring

• Community members were specifically concerned about facilities in the oil and gas, chemical, wood, and glass industries, autobody shops, construction activities, and waste transfer stations
OFFICE OF COMPLIANCE & ENFORCEMENT

GENERAL INDUSTRIAL

Bradley McClung
Supervising Air Quality Inspector
Industrial, Commercial, and Government Operations
GENERAL INDUSTRIAL

Manufacturing  Chemical  Utility

Minerals  Other Industrial
Industrial Facilities within SELA Emissions Study Area

- Chemical: 26
- Manufacturing: 95
- Utility: 11
- Other Industrial: 66

Legend:
- Chemical
- Manufacturing
- Utility
- Other Industrial
Operations to produce a specific type of product:

- Consumer Products
- Food and Beverages
- Paper Products
- Textiles Products
- Wood Products

Examples of equipment:

- Spray Booths
- Ovens
- Blending Tanks
CHEMICAL OPERATIONS

Operations to store, process, transfer, or produce chemicals:

- Paints and Solvents
- Pipeline Operations
- Petroleum Products
- Other Chemicals

Examples of equipment:

- Storage Tanks
- Heaters/Burners
- Blending Tanks
Operations supporting public utilities:

- Power Plants
- Water Departments
- Waste Management
- Wastewater Treatment

Examples of equipment:

- Emergency Diesel Generators
- Fuel Dispensing
- Power Plant Turbine
OTHER INDUSTRIAL

Other types of operations:
- Autobody Repair Shops
- Automotive Repair
- Construction Support Services

Examples of equipment:
- Paint Spray Booth
- Thermal Oxidizers for VOCs
- Boilers for Steam
FACILITY INSPECTIONS

- Process walkthrough
- Review of permitted/unpermitted equipment
- Production review
- Document review
- Sampling
- General observations
- Enforcement action as necessary
PUBLIC COMPLAINTS

- **1-800-CUT-SMOG (1-800-288-7664) or online** [www.aqmd.gov]

- Live attendant during business hours (Monday-Friday) or to our standby system off-hours

- Types of complaints: odors, dust, smoke, and other types

- Complainant information = confidential

- Complaints can be made anonymously

- **INSPECTORS FOLLOW-UP ON ALL COMPLAINTS**
Discussion with the complainant to obtain additional information

Surveillance of the alleged source

If source is unknown, investigate any potential sources

If a source is confirmed, conduct an on-site inspection

Enforcement action as necessary (Notice to Comply and/or Notice of Violation)
WHAT ARE YOUR CONCERNS?

- Compliance inspections are conducted at all types of facilities
- AB 617 empowers the community to identify concerns
- The Office of Compliance and Enforcement can take an enhanced enforcement approach through CERP Actions
Community members have identified:
- Chemical, including Oil and Gas
- Autobody Shops
- Waste Transfer Stations
- Fugitive Dust
- Glass Operations
- Wood Burning Operations
WORKING WITH THE CSC TOWARDS DEVELOPING THE COMMUNITY AIR MONITORING PLAN (CAMP)

WORKING WITH THE CSC TOWARDS DEVELOPING THE COMMUNITY AIR MONITORING PLAN (CAMP)

Define Goals and Objectives of Air Monitoring

Recommend Appropriate Monitoring Strategies and develop the CAMP

Begin Air Monitoring in Priority Areas

Identify Air Quality Priorities

Identify Types of Facilities and Pollutants of Interest

Today!

Today!

Fall 2020

December 2020

AQ Priority: General Industrial
DEVELOPMENT OF AIR MONITORING STRATEGIES

- Air monitoring equipment is designed to measure one or more specific air pollutants or class of air pollutants
- “General Industrial” consists of a wide variety of facilities that emit different types of pollutants
- In order to select the appropriate air monitoring strategy, the pollutants of interest must first be identified
- Pollutants of interest can be identified based on CSC input that relate to:
  - Facilities of concern
  - Specific operations of concern
  - Pollutants of interest

AQ Priority: General Industrial
DISCUSSION

- What are the facilities of concern?
- What are the specific operations of concern?
- Comments, Questions, Concerns?

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• Collaborate with city and county planning departments to conduct annual permit cross-checks for facilities in this community, to ensure that any facility with a conditional use permit also has an air district permit, where required.

• Work with local community centers and organizations to provide outreach and training on how to file air quality complaints by phone, web, or mobile app.
• Conduct Small Business Assistance outreach to identified facilities to provide information about permit applications.
COMMENTS AND QUESTIONS?
<table>
<thead>
<tr>
<th>Date</th>
<th>Event Description</th>
</tr>
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<tbody>
<tr>
<td>January 9, 2020</td>
<td>Community Kick-off Meeting&lt;br&gt;Salt Lake Park (Huntington Park)&lt;br&gt;6:00 – 8:30 pm</td>
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<tr>
<td>February 6, 2020</td>
<td>Community Steering Committee Meeting&lt;br&gt;Ross Hall at Veterans Park (Bell Gardens)&lt;br&gt;6:00 – 8:30 pm</td>
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<tr>
<td>March 12, 2020 and April 9, 2020</td>
<td>Community Steering Committee Meetings –&lt;br&gt;<strong>Postponed</strong></td>
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<td>May 7, 2020</td>
<td>Community Steering Committee Meeting&lt;br&gt;Virtual Meeting&lt;br&gt;4:00 – 6:00 pm</td>
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<td>June 11, 2020</td>
<td>Community Steering Committee Meeting&lt;br&gt;Virtual Meeting&lt;br&gt;4:00 – 6:00 pm</td>
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<tr>
<td>July 23, 2020</td>
<td>Workshop and Community Steering Committee Meeting&lt;br&gt;Virtual Meeting&lt;br&gt;4:00 – 6:00 pm</td>
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<tr>
<td>August 27, 2020</td>
<td>Workshop and Community Steering Committee Meeting&lt;br&gt;Virtual Meeting&lt;br&gt;4:00 – 6:00 pm</td>
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<tr>
<td>September 17, 2020</td>
<td>Workshop and Community Steering Committee Meeting&lt;br&gt;Virtual Meeting&lt;br&gt;4:00 – 6:00 pm</td>
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<td>October 8, 2020</td>
<td>Community Steering Committee Meeting&lt;br&gt;Virtual Meeting&lt;br&gt;4:00 – 6:00 pm</td>
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<tr>
<td>November 5, 2020</td>
<td>Community Steering Committee Meeting&lt;br&gt;Virtual Meeting&lt;br&gt;4:00 – 6:00 pm</td>
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