

PROPOSED RULE 415 ODORS FROM RENDERING FACILITIES



**September 15, 2017
Informational Meeting**

Background Need for Proposed Rule 415

- ▣ Long-standing community concern, clustering of facilities makes it difficult to identify source of odors
- ▣ Environmental Justice issue
 - Identified as major concern by 2010 Clean Communities Plan (CCP) working group
- ▣ Public comments received at community meetings in Vernon and surrounding communities
 - Frequent strong odors from rendering operations, very distinctive
 - Public has reported burning eyes, headaches, nausea, and respiratory irritation from intensity of odors
 - Quality of life/nuisance issue for people living near rendering facilities

Rulemaking History

- ▣ Staff initiated rulemaking in Spring 2014
 - Briefed Stationary Source Committee in February 2015
 - Public hearing was postponed from September to November 2015 to address stakeholder concerns
 - Staff was preparing for Set Hearing when rulemaking was temporarily suspended
 - SCAQMD staff visited two facilities as recently as July 2017
- ▣ September 1, 2017 Governing Board Meeting
 - Governing Board directed staff to proceed with rulemaking with a Public Hearing to consider the proposed rule in November

Rulemaking Process

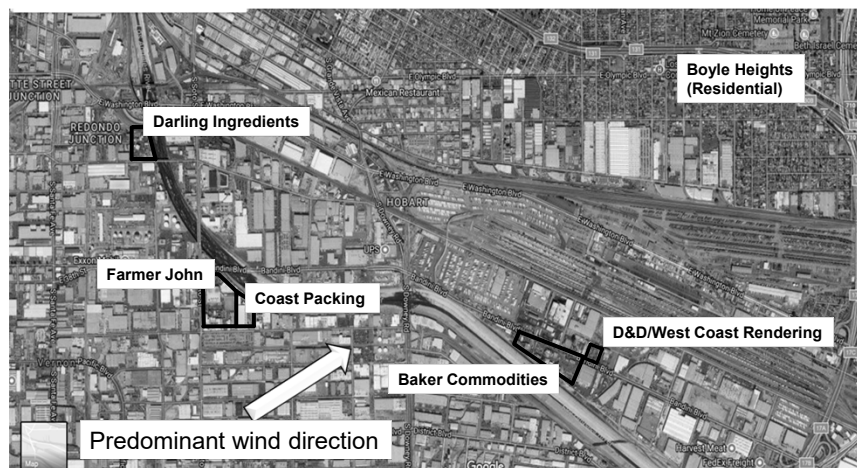
- ▣ Working Group Meetings
 - Working Group included variety of stakeholders – industry, environmental & community representatives, other agencies
 - Three Working Group Meetings (July and December 2014 and February 2015)
- ▣ Public Workshop and Consultation Meetings
 - March 2015 (Bristow Park, City of Commerce)
 - June 2015 (Salesian High School)
- ▣ Three public versions of Proposed Rule 415
- ▣ CEQA document circulated for 30-day public comment period from July 14 to August 12, 2015, extensive comments received
- ▣ Meetings and site visits throughout rulemaking process

Rendering

- ▣ Rendering industry provides a unique and beneficial service
 - Animal materials cannot be landfilled
 - Finished rendering products include grease, tallow, meat & bone used for animal feed, pet food, biofuels, cosmetics, lubricants, soap, fertilizer, etc.
 - Rendering facilities may also process odorous kitchen trap grease
- ▣ There are 5 rendering facilities in the Vernon area that would be subject to Proposed Rule 415*

*One facility, based on throughput, would only be subject to some best management practices

Vernon Area Rendering Facilities

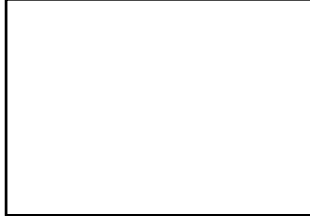


Origin of Rendering Odors

- ▣ Raw material receiving area
- ▣ High intensity odors from processing equipment:

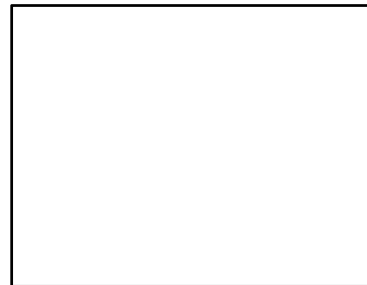
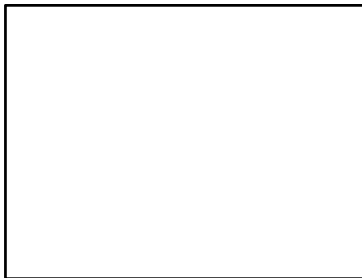


- Cookers
- Presses
- Centrifuges



Origin of Rendering Odors (*cont*)

- ▣ Wastewater treatment



- ▣ Many sources of fugitive odors at facility
- ▣ Odors can be episodic and difficult to track
- ▣ Clustering of rendering facilities makes it difficult to verify an odor complaint

What SCAQMD Requirements Currently Limit Rendering Odors?

- ▣ Facility permit
 - Limits throughput
 - Imposes certain housekeeping practices
- ▣ Rule 472 – Reduction of Animal Matter
 - Requires odors from rendering equipment to be incinerated, or equally effective method
 - Does not address odors from fugitive sources or wastewater treatment
- ▣ Rule 402 - Nuisance



Key Elements of Proposed Rule

- ▣ Near-term solution
 - Implement Odor Best Management Practices (BMPs)
- ▣ Mid-term solution
 - Install Odor Complaint contact sign near entrance
 - Repave/repair unloading area
- ▣ Long-term solution
 - Total enclosure or closed system for certain processes
 - ▣ Receiving area, processing equipment, wastewater treatment
 - Operate enclosure under negative pressure, vent enclosure to odor control equipment



Key Elements (cont.)

- ▣ Best Management Practices (BMPs)
 - Covering of incoming trucks
 - Delivery of raw rendering materials into enclosed area or transferred into covered containers
 - Washing of outgoing transport vehicles, drums, and containers
 - Repair of raw material receiving area to prevent accumulation of materials
 - Limits on the holding time for raw materials after crushing/grinding and after material is cooked
 - Transfer of materials in covered containers or closed conveyor system between buildings
 - Washdown of receiving area and cleaning of drains to prevent accumulation of materials
 - Requirements for trap grease tankers (removed)

Key Elements (cont.)

- ▣ Signage
 - Odor complaints
 - ▣ Contact 1-800-CUT-SMOG and facility representative
 - ▣ Odor sign will engage community members
 - Incoming trucks must be covered
- ▣ Odor Mitigation Plan (OMP) triggered if ongoing odor issues
 - 3 or more confirmed odor events in 180 days
 - Specific cause analysis (facility diagnosis) within 30 days
 - Considering approach similar to Rule 1430
 - ▣ Would trigger action within 60 days

Changes to Rule Language Following Stakeholder Comments

- ▣ Allowed closed system in lieu of total enclosure
 - Much lower cost
- ▣ Limited asphalt repair BMP to raw material receiving area only
- ▣ Exemptions from enclosure for limited-use operations:
 - Small batch cookers with limited throughput
 - Seldom-used rendering plants (25 days/yr or less)

Changes to Rule Language Following Stakeholder Comments (cont.)

- ▣ Allowed facilities to deposit incoming raw rendering materials outside of enclosure
 - Must be moved into enclosure or closed containers within specified time period
- ▣ Allowed temporary storage of raw materials at integrated facilities
- ▣ Provided alternatives to ventilation system standard
 - Lower inward face velocity when doors are open
 - Design standard in lieu of inward face velocity
 - ▣ Ventilation system designed for >20 air changes/hr

Changes to Rule Language Following Stakeholder Comments (cont.)

- ▣ Provided alternatives to wastewater enclosure
 - Rendering wastewater diluted >30:1 with non-rendering wastewater; or
 - COD <3000 for mixed wastewater exposed to atmosphere (3 year average)
- ▣ Provided the option for alternative BMPs that meet the same odor objective, upon EO approval
- ▣ Changed “odor-tight” to “covered” containers
- ▣ Deleted trap grease tanker delivery BMPs
 - Will be addressed in PR 416

Schedule

- ▣ Informational Meeting – September 15, 2017
- ▣ Set Hearing October 2017
- ▣ Public Hearing November 2017