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)

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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