PROPOSED RULE 415
ODORS FROM RENDERING FACILITIES

September 15, 2017
Informational Meeting
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

- Darling Ingredients
- Farmer John
- Coast Packing
- Baker Commodities
- D&D/West Coast Rendering
- Boyle Heights (Residential)
- Predominant wind direction
Origin of Rendering Odors

- Raw material receiving area
- High intensity odors from processing equipment:
  - Cookers
  - Presses
  - Centrifuges
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
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
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)
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