Sac Metro AQMD and The Sacramento Rendering Plant
Agenda

- **Introduction**
  - Larry Greene, Executive Director
- **Sac Metro Air Quality Management District (Sac Metro AQMD) Jurisdiction**
  - Kathrine Pittard, District Counsel
- **Plant History and Enforcement**
  - Angela Thompson, Program Coordinator
- **Source Testing**
  - Brian Krebs, Program Coordinator
- **Questions**
  - Sac Metro AQMD Staff and State of California Regional Water Board Staff
Why are we here tonight?
- Numerous complaints received
- Requests and concerns about emissions from the Sacramento Rendering Company
- Provide relevant information about Sacramento Rendering Company facility and permits
- Provide information about the emission control system
- Discuss emissions from plant
- Answer your questions
Sacramento Metropolitan Air Quality Management District (Sac Metro AQMD)

**Mission:** Achieve State and Federal clean air goals

- **Federal:**
  - Clean Air Act: Regulates Criteria Pollutants & Hazardous Air Pollutants (HAPs)

- **State:**
  - California Health and Safety Code, Air Toxic Control Measures

- **Local District:**
  - Local rules and guidance
Health and Safety Code § 41700 and Sac Metro AQMD Nuisance Rule (Rule 402) regulate nuisance.

- “The Right to Farm Act,” specifically exempts rendering plants from nuisance.
Right to Farm Act

California Civil Code § 3482.6. Agricultural processing activity not a nuisance;

- (a) No properly operated agricultural processing facility is subject to nuisance liability if it has been operated for 3 years and was not a nuisance when it began operation.

- (d) This section prevails over Health and Safety Code § 41700 unless the facility was surrounded by housing or businesses on January 1, 1993.

- (e)(1) For the purposes of this section: Agricultural processing facility includes, but is not limited to rendering plants.

- Sac Metro AQMD continues to respond to all complaints to ensure facility is being “properly operated”
Sacramento Rendering Company
In operation since 1913, at current location since 1955

Under permit with Sac Metro AQMD since 1976

Developments approved in 2002

Sacramento Rendering Company installed an enhanced odor control system prior to the issuance of any building permits for structures located downwind of the plant

- This odor control system was not required. Installation was voluntary
- This equipment is subject to Sac Metro AQMD permitting requirements because they are air pollution control devices
Permits to Operate

- **6 Air Pollution Control Scrubbers**
  - Use liquid to remove particulate matter or gases from the gas stream
- **2 Air Pollution Control Condensers**
  - Converts condensable components of the cooker exhaust gas stream to the liquid phase
- **1 Thermal Oxidizer**
  - Decomposes gases and VOCs at a high temperature
- **2 Boilers**
  - Used for the cooking process
Complaint Response

- Odor surveillance in Anatolia & Kavala neighborhoods during weekdays and weekends
- Unannounced inspections
- Compliance verification
  - Unannounced inspections vs. Operation records
  - Automated Rendering Plant Control System
  - Facility under 24/7 video surveillance
Sac Metro AQMD Enforcement

- Complaint Investigations and Surveillance

Rendering Odor Complaints
Rendering Odor Complaint Trends

- Complaint data from 2009 – 2016
  - 88% of complaints correlate with wind direction (S/SE/SW)
  - Majority of complaints correlate with a SW wind direction
  - Time & Day of Week Correlations

- Where have complaints come from
  - 56% from Anatolia community
  - 17% from Kavala community
  - 17% from Mather & Sunridge communities, Jackson Rd
<table>
<thead>
<tr>
<th>Year</th>
<th>Full Site Inspections</th>
<th>Violations issued</th>
<th>Violation could contribute to odor</th>
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<tr>
<td>2001</td>
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<td>1</td>
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Source Testing

- What is a Source Test?
- When is a Source Test required?
  - To verify compliance with a specific standard
  - If required by the 1987 Air Toxic Hotspots Act
    - Listed category (appendix E)
      - Rendering Plants are not listed in appendix E
    - Facility that emits greater than 10 tpy NOx or VOCs
      - Rendering plant does not emit greater than 10 tpy NOx or VOCs
Request for Source Testing

- Elevated complaints
  - Literature search
  - Preliminary Health Risk Assessment performed
- Sac Metro AQMD has asked and Sacramento Rendering Company has agreed to voluntarily perform a source test for toxics
Test Method – EPA TO 15

- EPA approved method
- Used to quantify Hazardous Air Pollutants
- Approximately 60 pollutants are quantified
- Reliable concentration calculations
  - Analysis using Gas Chromatography and Mass Spectrometry
  - Accurate for low concentrations
# Test Method EPA TO-15

## List of Typical Compounds

<table>
<thead>
<tr>
<th>Compound 1</th>
<th>Compound 2</th>
<th>Compound 3</th>
<th>Compound 4</th>
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<tbody>
<tr>
<td>1,1,1-Trichloroethane</td>
<td>2,2,4-Trimethylpentane</td>
<td>Chloroethane</td>
<td>Hexane</td>
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<tr>
<td>1,1,2,2-Tetrachloroethane</td>
<td>2-Butanone (Methyl Ethyl Ketone)</td>
<td>Chloroform</td>
<td>m,p-Xylene</td>
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<tr>
<td>1,1,2-Trichloroethane</td>
<td>2-Hexanone</td>
<td>Chloromethane</td>
<td>Methyl tert-butyl ether</td>
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<tr>
<td>1,1-Dichloroethane</td>
<td>2-Propanol</td>
<td>cis-1,2-Dichloroethe</td>
<td>Methylene Chloride</td>
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<tr>
<td>1,1-Dichloroethene</td>
<td>3-Chloropropene</td>
<td>cis-1,3-Dichloroprop</td>
<td>o-Xylene</td>
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<tr>
<td>1,2,4-Trichlorobenzene</td>
<td>4-Ethyltoluene</td>
<td>Cumene</td>
<td>Propylbenzene</td>
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<tr>
<td>1,2,4-Trimethylbenzene</td>
<td>4-Methyl-2-pentanone</td>
<td>Cyclohexane</td>
<td>Styrene</td>
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<td>1,2-Dibromoethane (EBB)</td>
<td>Acetone</td>
<td>Dibromochloromethane</td>
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<td>1,2-Dichlorobenzene</td>
<td>alpha-Chlorotoluene</td>
<td>Ethanol</td>
<td>Tetrahydrofuran</td>
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<td>1,2-Dichloroethene</td>
<td>Benzene</td>
<td>Ethyl Benzene</td>
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<td>1,2-Dichloropropane</td>
<td>Bromodichloromethane</td>
<td>Freon 11</td>
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<tr>
<td>1,3,5-Trimethylbenzene</td>
<td>Bromoform</td>
<td>Freon 113</td>
<td>trans-1,3-Dichloropropene</td>
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<tr>
<td>1,3-Butadiene</td>
<td>Bromomethane</td>
<td>Freon 114</td>
<td>Trichloroethene</td>
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<tr>
<td>1,3-Dichlorobenzene</td>
<td>Carbon Disulfide</td>
<td>Freon 12</td>
<td>Vinyl Chloride</td>
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<td>1,4-Dichlorobenzene</td>
<td>Carbon Tetrachloride</td>
<td>Heptane</td>
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<tr>
<td>1,4-Dioxane</td>
<td>Chlorobenzene</td>
<td>Hexachlorobutadiene</td>
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</table>
Sacramento Rendering Company has agreed to perform a source test, measuring toxics using TO-15.

- Source test plan will be reviewed by District Staff.
- Source test will be observed by District Staff.
- Results will be made available to the public.
- This presentation will be available at www.airquality.org.
Sac Metro AQMD Contact Info

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