

# Sac Metro AQMD and The Sacramento Rendering Plant

November 9, 2016

# 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

# Purpose

- 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

# Welcome and Introduction

- 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

# Sac Metro AQMD Jurisdiction

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.

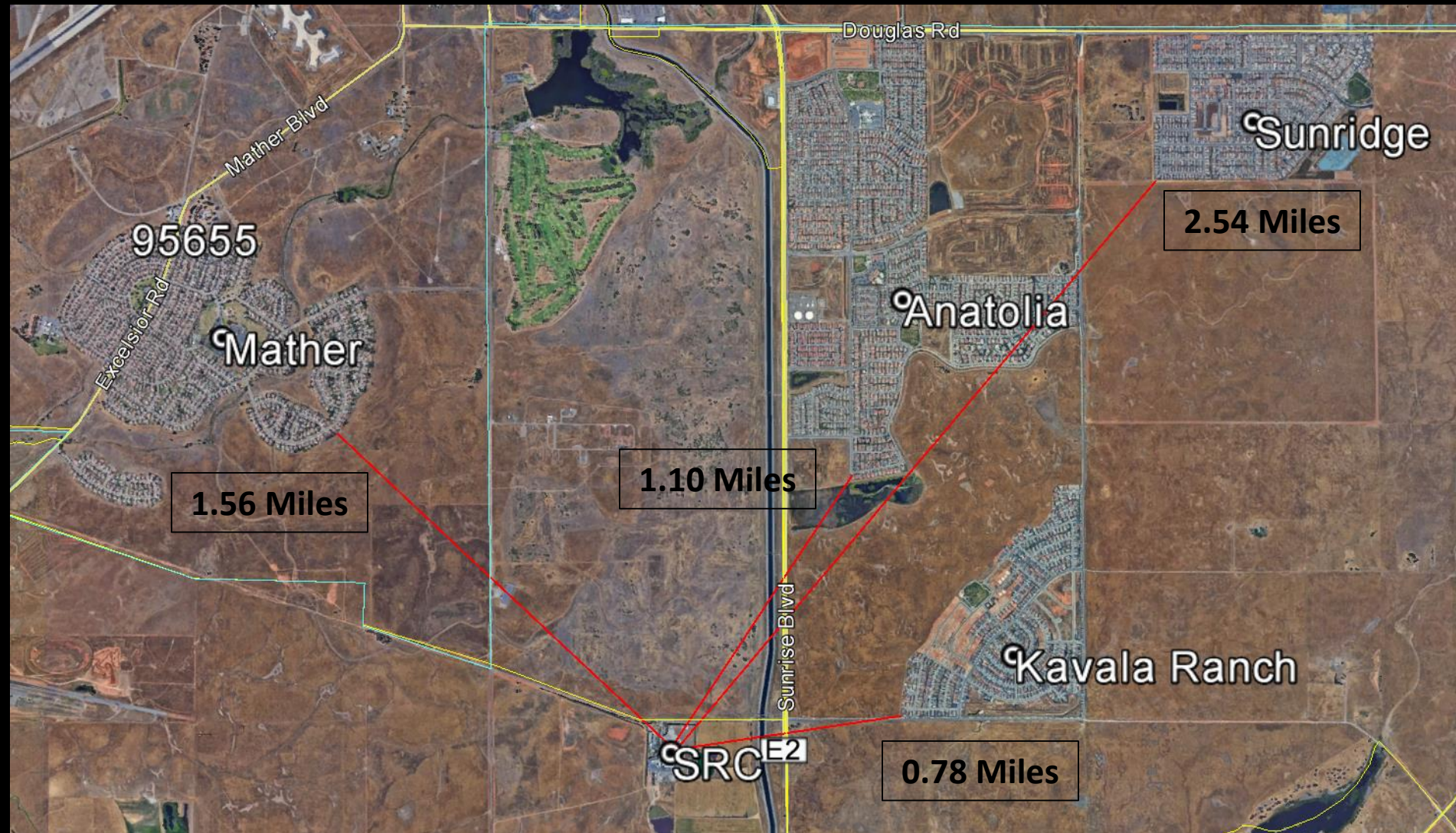
# Right to Farm Act

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”

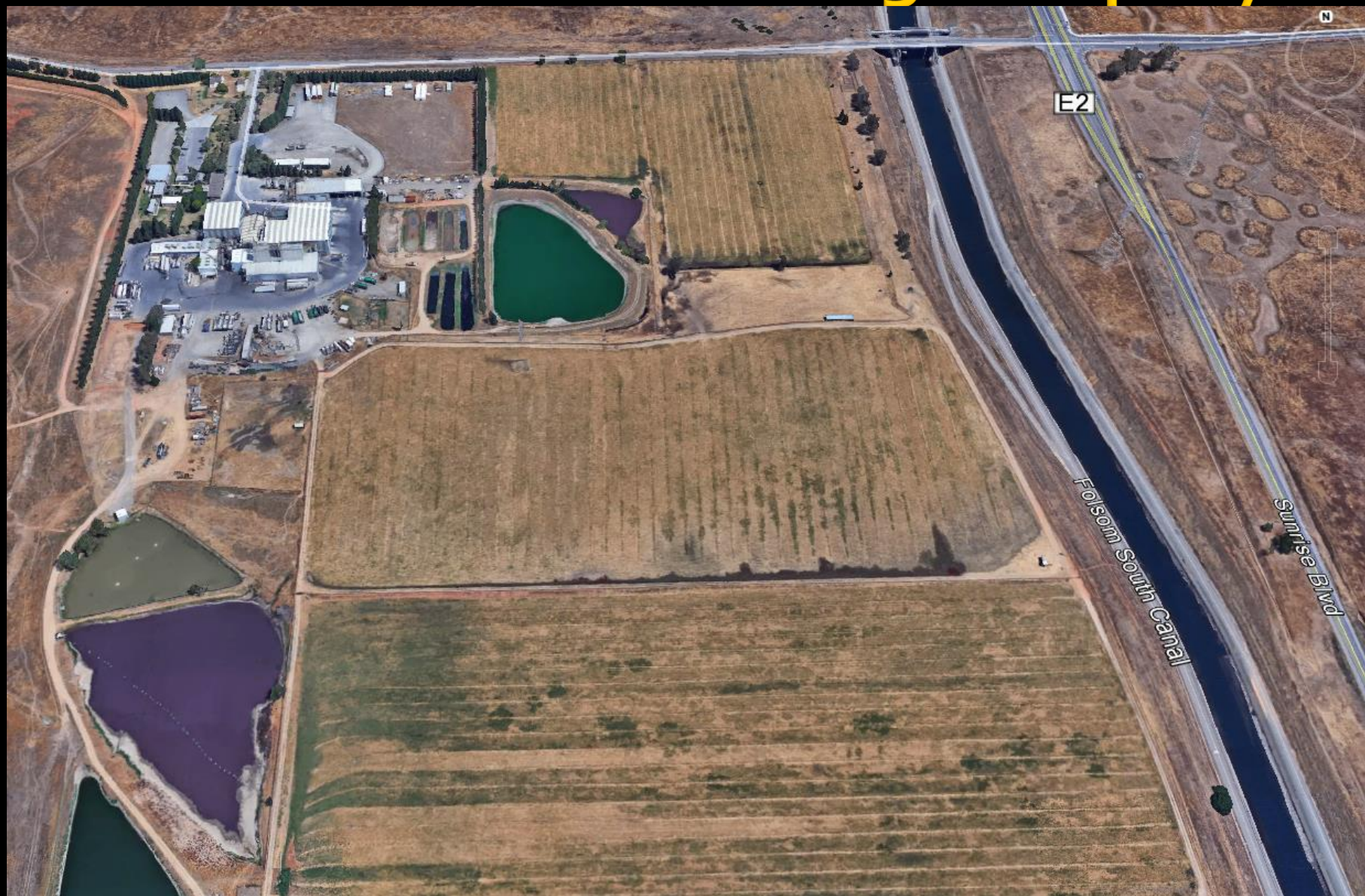


# Sacramento Rendering Company





# Sacramento Rendering Company





# Sacramento Rendering Company History

- 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

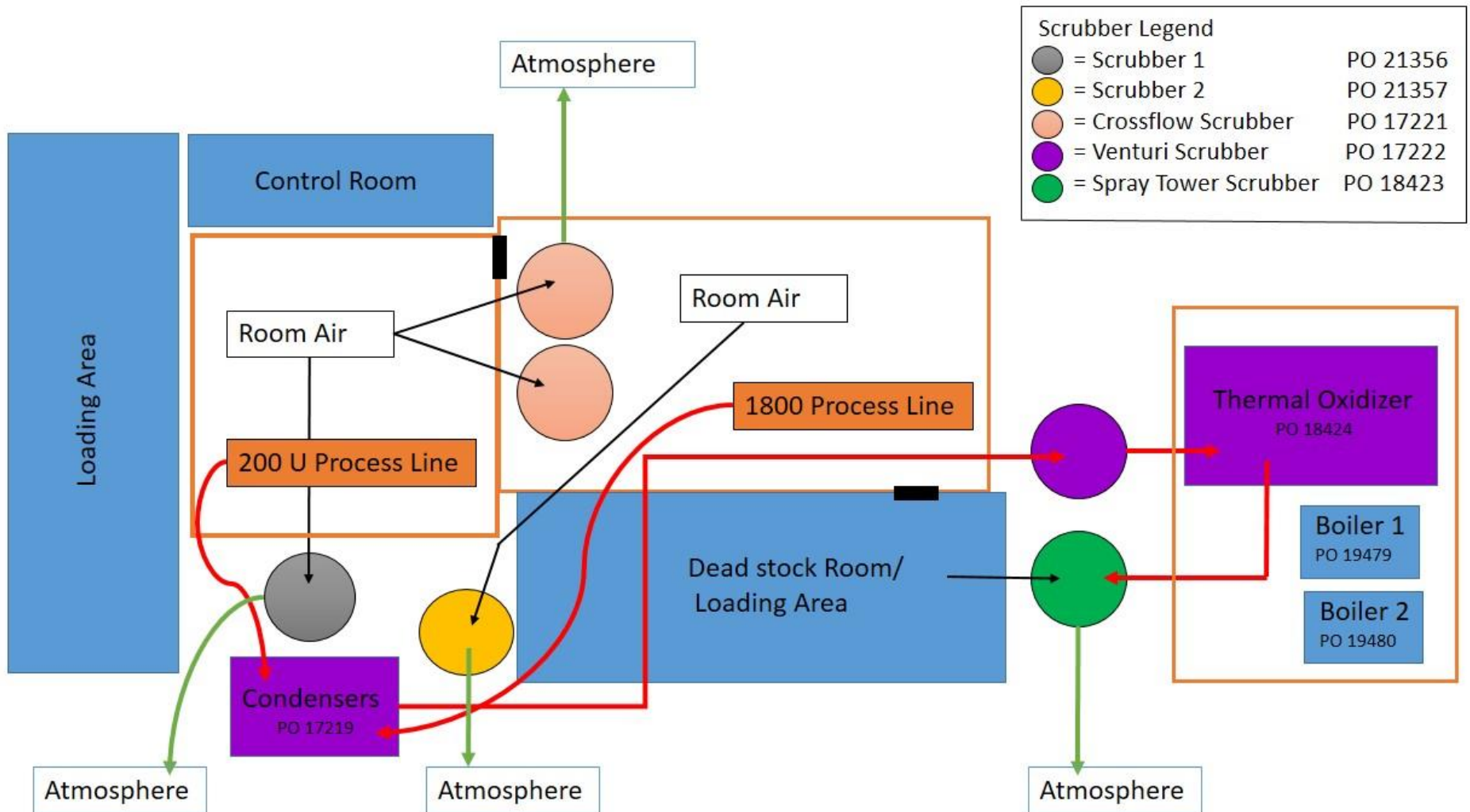
- **1 Thermal Oxidizer**

- Decomposes gases and VOCs at a high temperature

- **2 Boilers**

- Used for the cooking process

# Sacramento Rendering Company



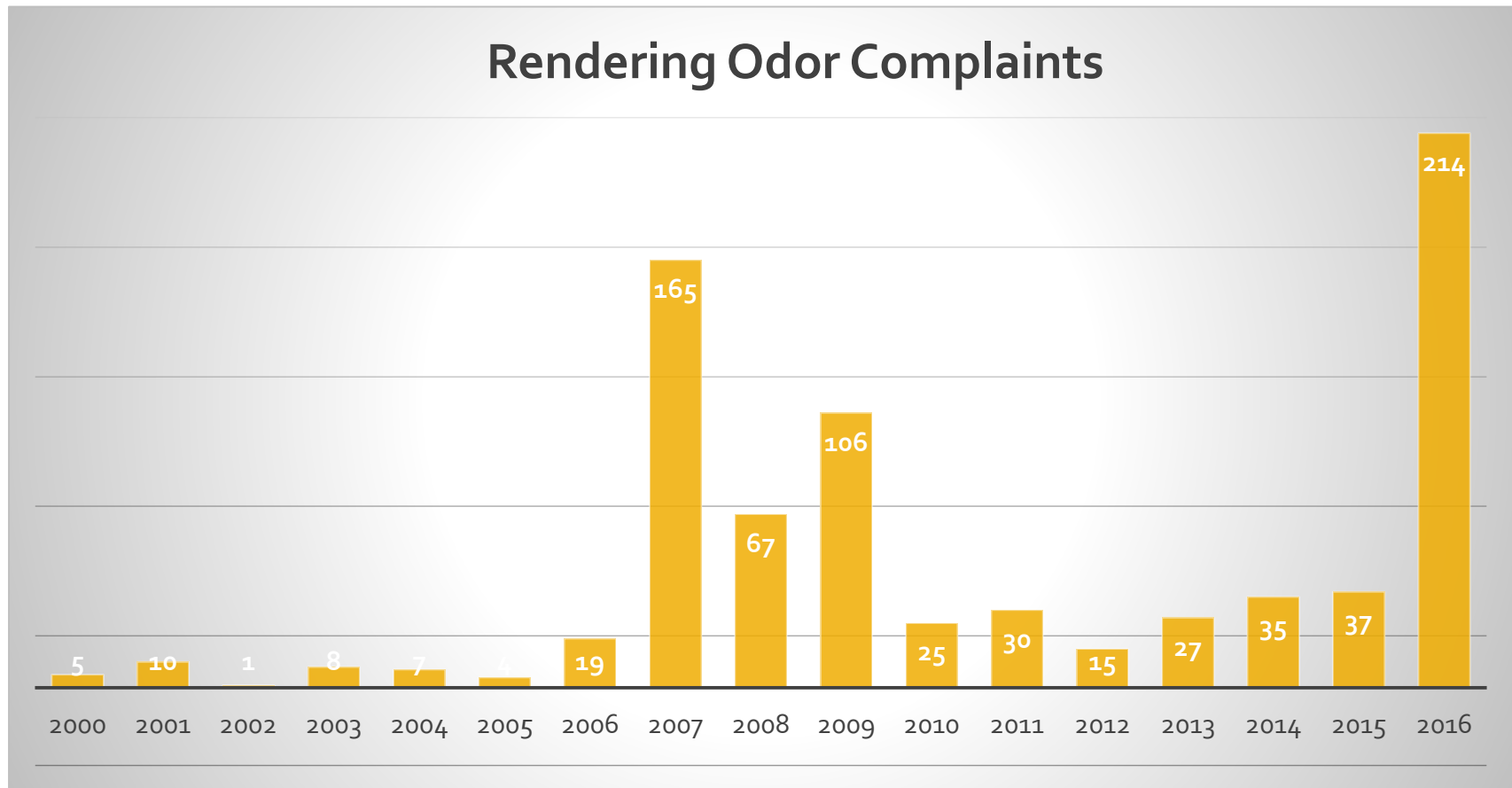
# Complaint Response

- 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 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

<b>Year</b>	<b>Full Site Inspections</b>	<b>Violations issued</b>	<b>Violation could contribute to odor</b>
<b>2016</b>	<b>8</b>	<b>1</b>	<b>No</b>
<b>2015</b>	<b>8</b>	<b>1</b>	<b>No</b>
<b>2014</b>	<b>3</b>	<b>1</b>	<b>No</b>
<b>2013</b>	<b>2</b>	<b>0</b>	<b>-</b>
<b>2012</b>	<b>1</b>	<b>0</b>	<b>-</b>
<b>2011</b>	<b>4</b>	<b>0</b>	<b>-</b>
<b>2010</b>	<b>3</b>	<b>0</b>	<b>-</b>
<b>2009</b>	<b>15</b>	<b>0</b>	<b>-</b>

<b>Year</b>	<b>Full Site Inspections</b>	<b>Violations issued</b>	<b>Violations could contribute to odor</b>
<b>2008</b>	<b>18</b>	<b>0</b>	<b>-</b>
<b>2007</b>	<b>3</b>	<b>0</b>	<b>-</b>
<b>2006</b>	<b>4</b>	<b>6</b>	<b>Yes</b>
<b>2005</b>	<b>1</b>	<b>3</b>	<b>Yes</b>
<b>2004</b>	<b>2</b>	<b>3</b>	<b>Yes</b>
<b>2003</b>	<b>2</b>	<b>0</b>	<b>-</b>
<b>2002</b>	<b>1</b>	<b>0</b>	<b>-</b>
<b>2001</b>	<b>1</b>	<b>1</b>	<b>Yes</b>



# 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 NO<sub>x</sub> or VOCs  
Rendering plant does not emit greater than 10 tpy NO<sub>x</sub> 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

1,1,1-Trichloroethane	2,2,4-Trimethylpentane	Chloroethane	Hexane
1,1,2,2-Tetrachloroethane	2-Butanone (Methyl Ethyl Ketone)	Chloroform	m,p-Xylene
1,1,2-Trichloroethane	2-Hexanone	Chloromethane	Methyl tert-butyl ether
1,1-Dichloroethane	2-Propanol	cis-1,2-Dichloroethene	Methylene Chloride
1,1-Dichloroethene	3-Chloropropene	cis-1,3-Dichloropropene	o-Xylene
1,2,4-Trichlorobenzene	4-Ethyltoluene	Cumene	Propylbenzene
1,2,4-Trimethylbenzene	4-Methyl-2-pentanone	Cyclohexane	Styrene
1,2-Dibromoethane (EDB)	Acetone	Dibromochloromethane	Tetrachloroethene
1,2-Dichlorobenzene	alpha-Chlorotoluene	Ethanol	Tetrahydrofuran
1,2-Dichloroethane	Benzene	Ethyl Benzene	Toluene
1,2-Dichloropropane	Bromodichloromethane	Freon 11	trans-1,2-Dichloroethene
1,3,5-Trimethylbenzene	Bromoform	Freon 113	trans-1,3-Dichloropropene
1,3-Butadiene	Bromomethane	Freon 114	Trichloroethene
1,3-Dichlorobenzene	Carbon Disulfide	Freon 12	Vinyl Chloride
1,4-Dichlorobenzene	Carbon Tetrachloride	Heptane	
1,4-Dioxane	Chlorobenzene	Hexachlorobutadiene	



# Conclusions

- 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 public
- This presentation will be available at [www.airquality.org](http://www.airquality.org)

# Sac Metro AQMD Contact Info

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