

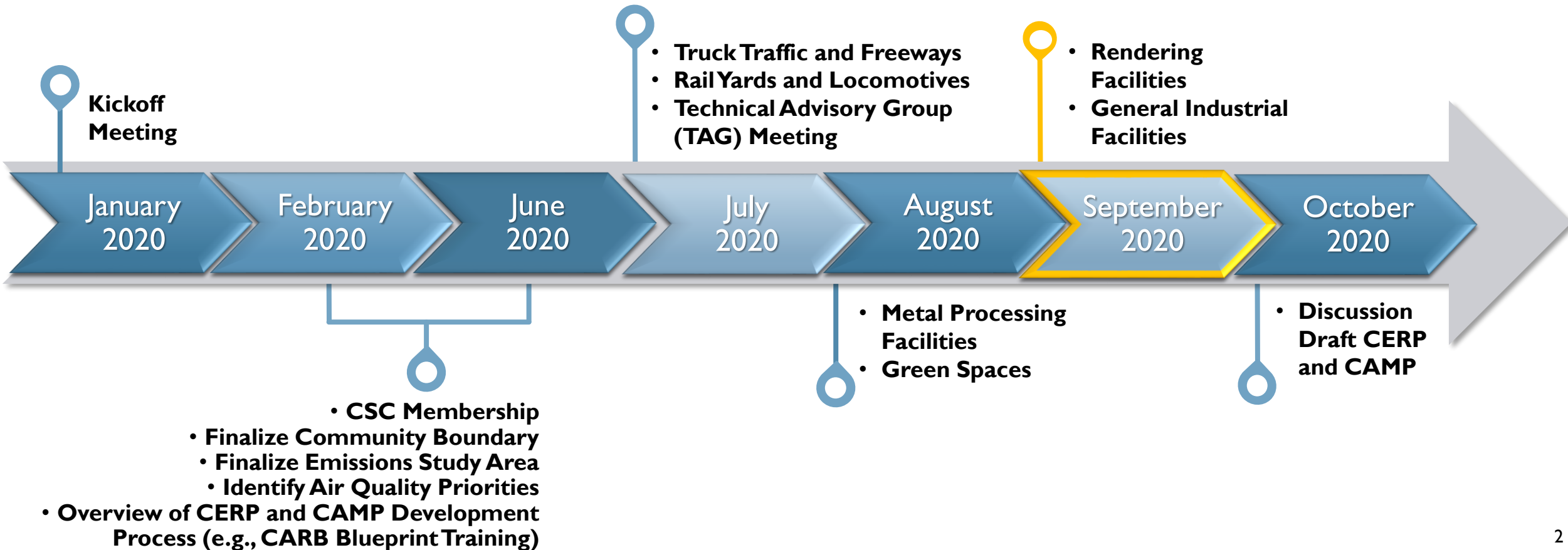
# RENDERING FACILITIES AND GENERAL INDUSTRIAL FACILITIES

SOUTHEAST LOS ANGELES CSC MEETING AND WORKSHOP #6  
SEPTEMBER 17, 2020



Dianne Sanchez, Ph.D. - Air Quality Specialist

# CERP AND CAMP TIMELINE





# AIR QUALITY PRIORITY – RENDERING FACILITIES

# RENDERING FACILITIES – AIR QUALITY PRIORITY OVERVIEW



- CSC members identified rendering facilities as a top air quality priority
- Community members expressed general concerns about noxious odors, especially around schools

# RENDERING FACILITIES – EMISSIONS SOURCES AND BACKGROUND



- Rendering is a process that converts waste animal tissue into grease, soap and other materials
- Dry material from the process may be used for pet food, fertilizer, and other products
- The rendering process can cause odors
- Strong odors can cause coughing, sore throat, nausea, etc.
- South Coast AQMD Rule 415 was adopted in November 2017 to reduce odors from rendering facilities

# RENDERING FACILITIES – RULE 415 OVERVIEW



## Best Management Practices

- Cover trucks
- Limit holding time for materials
- Wash down requirements
- Repair pavement



## Permanent Enclosure or Closed System for Operations

- Applies to receiving area, processing equipment, and wastewater
- 2.5 to 3.5 years to design, permit and construct

To Report Odors Call the South Coast Air Quality Management District at  
1-800-CUT SMOG  
or Facility Contact at  
1-555-555-5555

## Signage

- Contact 1-800-CUT-SMOG and facility
- Inform community in English and Spanish



## Additional Requirements

- Triggered if odor issues continue
- Facility required to do a specific cause analysis for odor events

# OFFICE OF COMPLIANCE & ENFORCEMENT



## RENDERING

HUGH HENEY

Air Quality Analysis and Compliance Supervisor

Major Sources

# RENDERING – 5 PLANTS

Darling Ingredients

Baker  
Commodities

Smithfield Packaged  
Meat (“Farmer  
John’s”)

Legacy By-Products  
(Previously D & D  
/West Coast  
Rendering)

Coast Packing



# TWO KEY RULES FOR ENFORCEMENT

## Rule 415 – Odors from Rendering Facilities

- Requires Best Management Practices (BMPs) to reduce/control odors
- Requires signage for the public
- Thresholds and requirements for an “Odor Event”

## Rule 402 – Public Nuisances

- The regulation cited for any air pollution concern, including odors, that is negatively affecting a considerable number of the people or the public

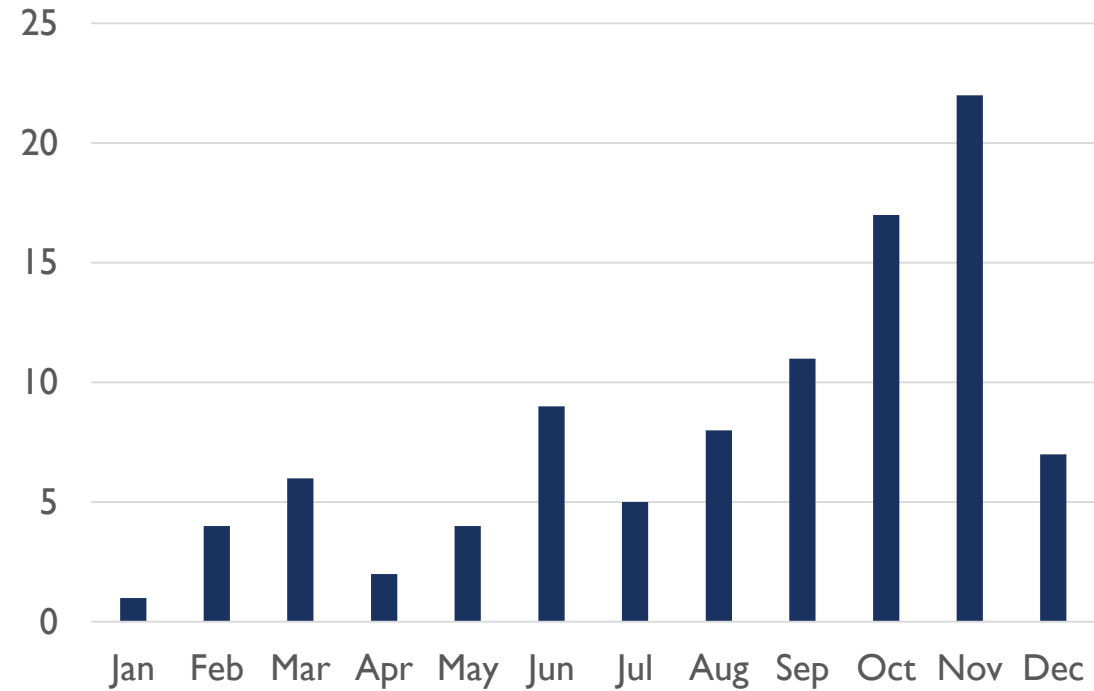
# PUBLIC COMPLAINTS

- **I-800-CUT-SMOG (I-800-288-7664) or online [www.aqmd.gov](http://www.aqmd.gov)**
- Live attendant during business hours (Monday-Friday) or to our standby system off-hours
- Types of complaints: odors
- Complainant information = confidential
- Complaints can be made anonymously
- ***INSPECTORS RESPOND TO ALL COMPLAINTS***



# COMPLAINTS RECEIVED IN SELA

2019 Rendering Complaints Received in SELA



# HOW DO WE INSPECT?

- Verify equipment and permit conditions
- Enforce Rule 415
  - Compliance with all BMPs, including:
    - Hold time of raw materials (4 hours or less)
    - Housekeeping/washing procedures for handling areas, trucks, containers, and drains
    - Maintain unloading area free of standing water
  - Compliance with Permanent Total Enclosure (PTE) construction timeline:
    - Wastewater area: 12 months after Permit to Construct issued
    - Raw material/processing area: 24 months after Permit to Construct issued

# PERMITTING PROGRESS

Facility	Permit to Construct Issue Date	Wastewater Area	Raw Material Receiving Area	Raw Material Grinding and Cooking Operations
Darling Ingredients	8/8/2019	N/A – No Treatment	8/7/2020 & 8/7/2021 (Completed)	
Baker Commodities	3/10/2020 & 4/30/2020	Request for up to 12 month Extension Under Evaluation		24 months from PC (April 2022)
Smithfield Packaged Meat (formerly Farmer John's)	Under Evaluation	12 months from PC issuance	24 months from PC (likely 2022)	
Legacy By-Products (previously D&D/West Coast Rendering)	Under Evaluation	12 months from PC issuance	24 months from PC (likely 2022)	
Coast Packing	N/A - Exempt from Rule 415(d)(1)(3) enclosure/control system requirements per Rule 415(l)(3).			

# ENFORCEMENT ACTIONS (NOVs)

Facility	2019	2020
Baker Commodities	4	0
D&D/West Coast Rendering (Legacy By-Products)	4	0
Darling Ingredients	1	0
Smithfield Packaged Meat	1	1
Coast Packing	0	0
<b>Total:</b>	<b>10</b>	<b>1</b>



# RULE 415 - ODOR EVENTS

- Odor Event = 3 or more verified odor complaints from different individuals
- Specific Cause Analysis = A process required for a facility to investigate the cause of a confirmed odor event and identify corrective measures previously taken, needed, or to be taken to prevent recurrence of a similar event.
- Odor Mitigation Plan required if:
  1. NOV for Public Nuisance related to rendering odors under Rule 402, or
  2. 3 or more odor events in 180 days

QUESTIONS?

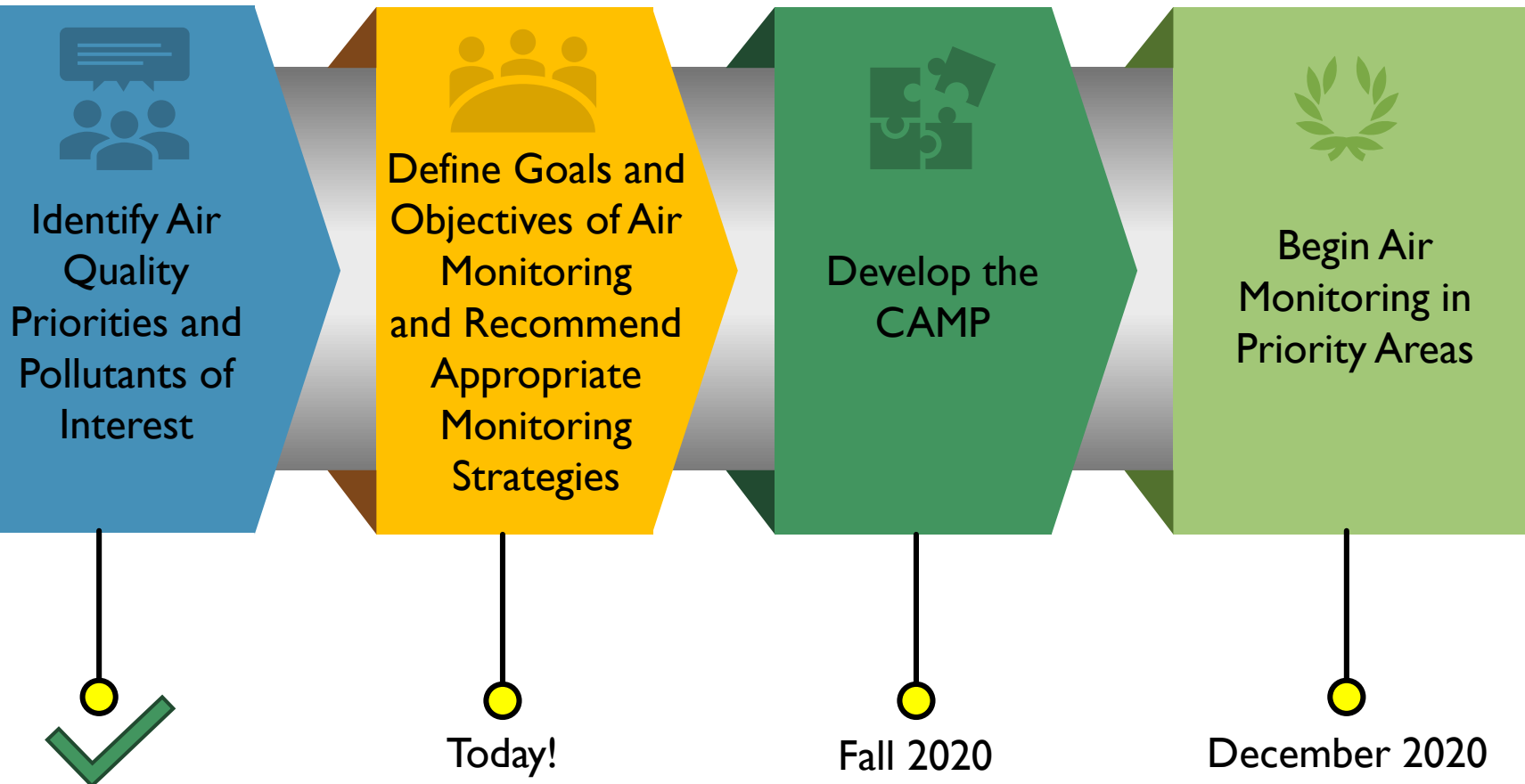


# CAMP DEVELOPMENT RENDERING FACILITIES



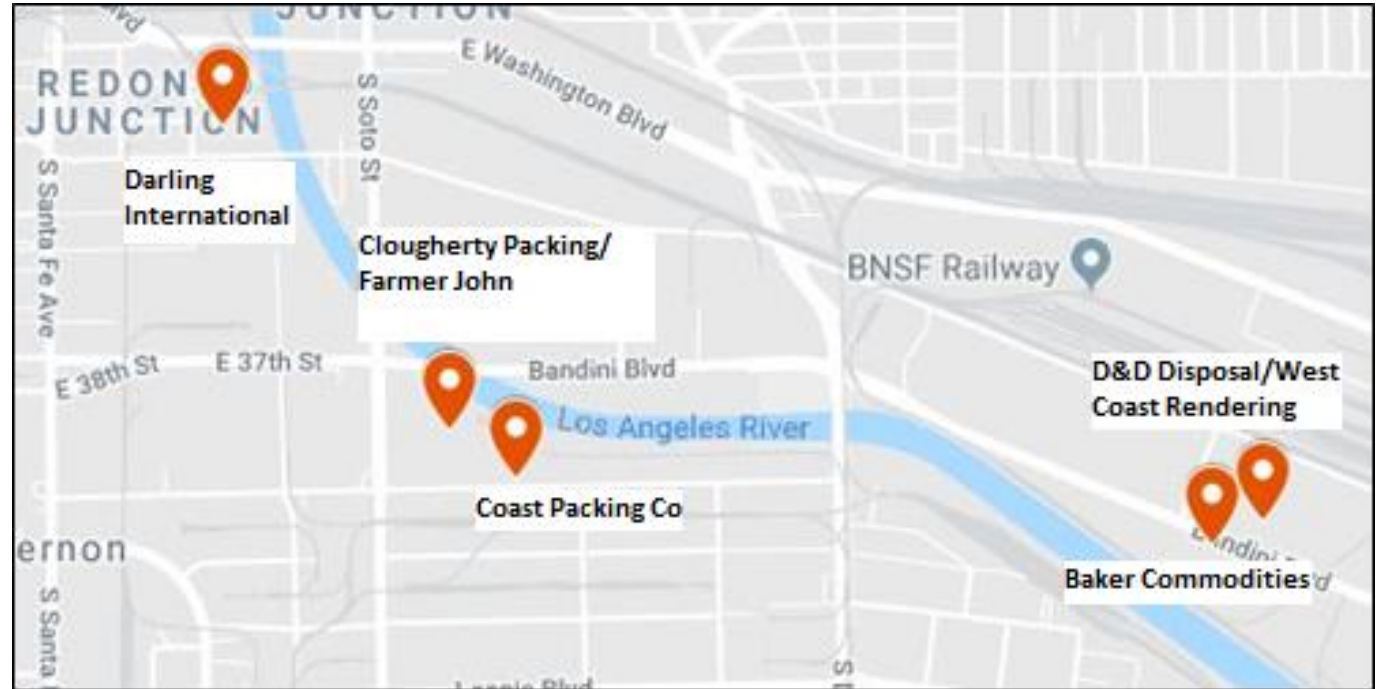
PAYAM PAKBIN, PHD  
PROGRAM SUPERVISOR

# WORKING WITH THE CSC TOWARDS DEVELOPING THE COMMUNITY AIR MONITORING PLAN (CAMP)



# RENDERING FACILITIES

- Several steps that are part of the rendering process can emit odors
- Odor nuisances from rendering facilities in Vernon can impact the quality of life of individuals living in Southeast Los Angeles



# WHAT HAS BEEN DONE SO FAR?

South Coast AQMD evaluated the performance of a new specialized air monitor operated by a contractor

As part of this evaluation, mobile monitoring was conducted around all five rendering facilities

South Coast AQMD is currently in the process of developing its own mobile laboratory

# AIR MONITORING CHALLENGES AND LIMITATIONS

## Detection of odorous compounds

- Plumes consist of a complex mix of particle and gaseous pollutants
- Most of these compounds can cause odors at very low concentrations
- Often, the human nose can detect odors better than the most sophisticated air measurement equipment

## Identification of the emission source(s)

- Difficult to identify which facility is the main source of odors because of:
  - Proximity of the rendering plants
  - Variable wind conditions in the area

# AIR MONITORING SOLUTION

- **Target Air Pollutants**
  - VOCs, odorous compounds
- **Purpose of Air Monitoring**
  - To assess how emissions from rendering facilities may impact air quality in nearby communities
- **Air Monitoring Solution**
  - Mass Spectrometer Mobile Laboratory
    - Proof of concept conducted in collaboration with Aerodyne Research
- **South Coast AQMD's mobile laboratory is currently under development**

Aerodyne Research Mobile Laboratory



# MONITORING STRATEGY DEVELOPED BY THE ELABHWC CSC

## ■ Chapter 5e, Action 1

Conduct mobile monitoring for volatile organic compounds (VOCs) and other odorous compounds



Conduct mobile monitoring near each of the five facilities



Make monitoring data publicly available



# DISCUSSION

- What other factors should be considered?
- Comments, Questions, Concerns?

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# RENDERING FACILITIES – POTENTIAL CERP POLICIES



- Conduct mobile air measurements for volatile organic compounds (VOCs) near each rendering facility in the community and make air monitoring data publicly available



- Engage in and provide information for the community on Rule 415 requirements, which address odors from rendering facilities



- Conduct facility inspections to evaluate compliance with Rule 415, and follow-up with enforcement action, where appropriate
- Make referrals to other regulatory agencies and local health department, as appropriate

# DISCUSSION



COMMENTS AND QUESTIONS?



# AIR QUALITY PRIORITY – GENERAL INDUSTRIAL FACILITIES

# GENERAL INDUSTRIAL FACILITIES – AIR QUALITY PRIORITY OVERVIEW



- CSC members identified general industrial facilities as a top air quality priority
- Community members expressed general concerns about emissions of solvents, fugitive dust, best available control technology, facility permitting, and air monitoring
- Community members were specifically concerned about facilities in the oil and gas, chemical, wood, and glass industries, autobody shops, construction activities, and waste transfer stations

# OFFICE OF COMPLIANCE & ENFORCEMENT



## GENERAL INDUSTRIAL

**Bradley McClung**

Supervising Air Quality Inspector

Industrial, Commercial, and Government Operations

# GENERAL INDUSTRIAL

Manufacturing

Chemical

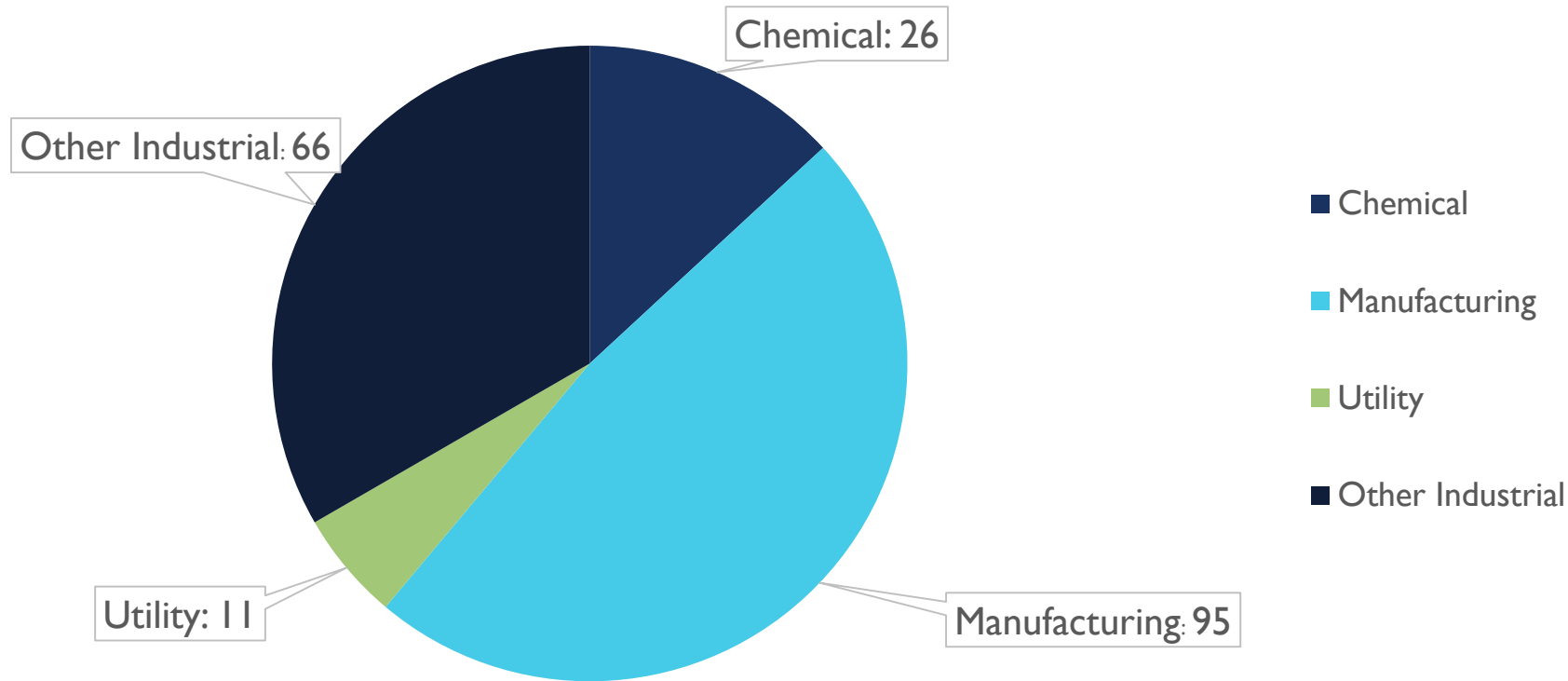
Utility

Minerals

Other  
Industrial

# IN YOUR COMMUNITY

## Industrial Facilities within SELA Emissions Study Area



# MANUFACTURING OPERATIONS

Operations to produce a specific type of product:

- Consumer Products
- Food and Beverages
- Paper Products
- Textiles Products
- Wood Products

Examples of equipment:

- Spray Booths
- Ovens
- Blending Tanks





# CHEMICAL OPERATIONS

Operations to store, process, transfer, or produce chemicals:

- Paints and Solvents
- Pipeline Operations
- Petroleum Products
- Other Chemicals

Examples of equipment:

- Storage Tanks
- Heaters/Burners
- Blending Tanks



# UTILITY OPERATIONS

Operations supporting public utilities:

- Power Plants
- Water Departments
- Waste Management
- Wastewater Treatment

Examples of equipment:

- Emergency Diesel Generators
- Fuel Dispensing
- Power Plant Turbine



# OTHER INDUSTRIAL

## Other types of operations:

- Autobody Repair Shops
- Automotive Repair
- Construction Support Services



## Examples of equipment:

- Paint Spray Booth
- Thermal Oxidizers for VOCs
- Boilers for Steam



# FACILITY INSPECTIONS



- Process walkthrough
- Review of permitted/unpermitted equipment
- Production review
- Document review
- Sampling
- General observations
- Enforcement action as necessary



# PUBLIC COMPLAINTS

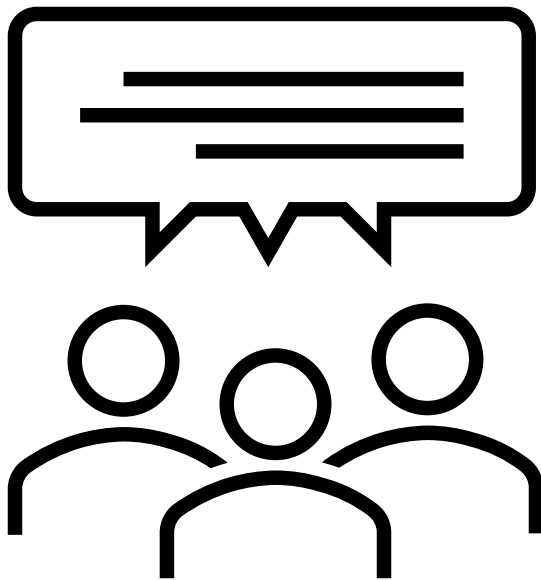
- **I-800-CUT-SMOG (I-800-288-7664) or online [www.aqmd.gov](http://www.aqmd.gov)**
- Live attendant during business hours (Monday-Friday) or to our standby system off-hours
- Types of complaints: odors, dust, smoke, and other types
- Complainant information = confidential
- Complaints can be made anonymously
- ***INSPECTORS FOLLOW-UP ON ALL COMPLAINTS***



# COMPLAINT INVESTIGATIONS

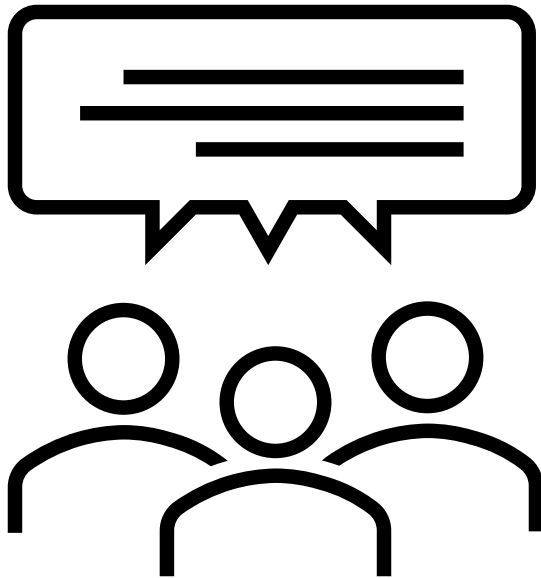
- Discussion with the complainant to obtain additional information
- Surveillance of the alleged source
- If source is unknown, investigate any potential sources
- If a source is confirmed, conduct an on-site inspection
- Enforcement action as necessary (Notice to Comply and/or Notice of Violation)

# WHAT ARE YOUR CONCERNS?



- Compliance inspections are conducted at all types of facilities
- AB 617 empowers the community to identify concerns
- The Office of Compliance and Enforcement can take an enhanced enforcement approach through CERP Actions

# WHAT ARE YOUR CONCERNS? (CONT'D)



Community members have identified:

- Chemical, including Oil and Gas
- Autobody Shops
- Waste Transfer Stations
- Fugitive Dust
- Glass Operations
- Wood Burning Operations

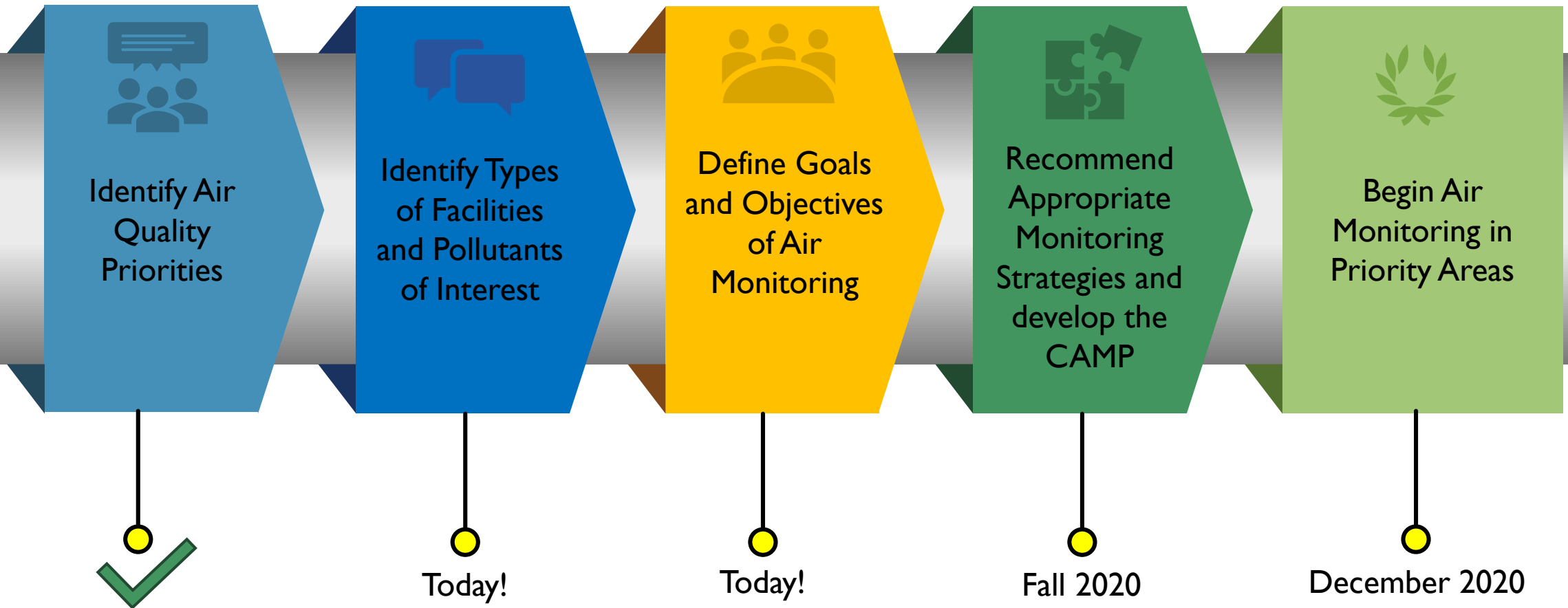


# CAMP DEVELOPMENT GENERAL INDUSTRIAL



PAYAM PAKBIN, PHD  
PROGRAM SUPERVISOR

# WORKING WITH THE CSC TOWARDS DEVELOPING THE COMMUNITY AIR MONITORING PLAN (CAMP)



# DEVELOPMENT OF AIR MONITORING STRATEGIES



- Air monitoring equipment is designed to measure one or more specific air pollutants or class of air pollutants
- “General Industrial” consists of a wide variety of facilities that emit different types of pollutants
- In order to select the appropriate air monitoring strategy, the pollutants of interest must first be identified
- Pollutants of interest can be identified based on CSC input that relate to:
  - Facilities of concern
  - Specific operations of concern
  - Pollutants of interest

# DISCUSSION

- What are the facilities of concern?
- What are the specific operations of concern?
- Comments, Questions, Concerns?

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# GENERAL INDUSTRIAL FACILITIES – POTENTIAL CERP POLICIES



- Collaborate with city and county planning departments to conduct annual permit cross-checks for facilities in this community for, to ensure that any facility with a conditional use permit also has an air district permit, where required



- Work with local community centers and organizations to provide outreach and training on how to file air quality complaints by phone, web, or mobile app
- Conduct Small Business Assistance outreach to identified facilities to provide information about permit applications

# DISCUSSION



COMMENTS AND QUESTIONS?

# AB 617 – 2020 COMMUNITY STEERING COMMITTEE SCHEDULE (SELA)

<b>January 9, 2020</b>	<b>Community Kick-off Meeting</b> Salt Lake Park (Huntington Park) 6:00 – 8:30 pm	<b>July 23, 2020</b>	<b>Workshop and Community Steering Committee Meeting</b> Virtual Meeting 4:00 – 6:00 pm
<b>February 6, 2020</b>	<b>Community Steering Committee Meeting</b> Ross Hall at Veterans Park (Bell Gardens) 6:00 – 8:30 pm	<b>August 27, 2020</b>	<b>Workshop and Community Steering Committee Meeting</b> Virtual Meeting 4:00 – 6:00 pm
<b>March 12, 2020 and April 9, 2020</b>	<b>Community Steering Committee Meetings –</b> <div style="text-align: center; color: red; font-weight: bold; font-size: 1.2em;">Postponed</div>	<b>September 17, 2020</b>	<b>Workshop and Community Steering Committee Meeting</b> Virtual Meeting 4:00 – 6:00 pm
<b>May 7, 2020</b>	<b>Community Steering Committee Meeting</b> Virtual Meeting 4:00 – 6:00 pm	<b>October 8, 2020</b>	<b>Community Steering Committee Meeting</b> Virtual Meeting 4:00 – 6:00 pm
<b>June 11, 2020</b>	<b>Community Steering Committee Meeting</b> Virtual Meeting 4:00 – 6:00 pm	<b>November 5, 2020</b>	<b>Community Steering Committee Meeting</b> Virtual Meeting 4:00 – 6:00 pm