A6902
MANILA

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

A690238280

FACILITY: DARLING INGREDIENTS INC		SRN / ID: A6902
LOCATION: 3350 GREENFIELD RD, MELVINDALE		DISTRICT: Detroit
CITY: MELVINDALE		COUNTY: WAYNE
CONTACT: Don Muchow , District Manager		ACTIVITY DATE: 11/28/2016
STAFF: Terseer Hemben	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Grease recycling		
RESOLVED COMPLAINTS:		

COMPLIANCE INSPECTION OF DARLING INGREDIENTS INC.

Inspector: Terseer Hemben (AQD)
Personnel Present: Mr. Jon Elrod (Asst. Manager of Environmental Affairs), Ms. Kelly Thomas (Health and Safety Administrator)
Company: Darling Ingredients (DI)
3350 Greenfield, Melvindale, MI 48122
SRN: A6902
Date of Inspection: November 28, 2016
Facility Phone Number: 313-928-7400

BACKGROUND:
The Darling Ingredients, Inc. (DII) located at 3350 Greenfield, Melvindale, Michigan was formerly operated as Darling International Inc. The corporate name was changed in 2014 to Darling Ingredients. The facility is currently operated under Permits to Install# 397-98A and 132-03A.

The DII facility operates an edible oil recycling facility in the city of Melvindale. The source is permitted for control of odor and nuisance fallouts under Rule 901. DII odor emissions are controlled by 2 two packed tower scrubbers rated at 100k cfm,15k cfm, and the chlorine dioxide systems. Odorous gases are treated using scrubbers. The scrubbers installed at the facility are required to be running all the time.

DII ceased rendering of animal products at the site, and shut down the 60k cfm scrubber that controlled emissions from from the rendering operations. The facility receives waste cooking oil from restaurants, and cooking establishments from different sources by trucks. Raw materials are dumped into receiving hopper where unwanted impurities are removed. The hopper content is passed over the drainage whereby solids are removed and liquid is pumped to storage. Filtered raw grease is pumped to evaporation where moisture is removed by cooking. The cooked grease, referred to as yellow grease, is sent to centrifuge for cleaning. The yellow grease is pumped to storage for shipment.

Monitoring of the Darling grease and tallow recycling process is achieved through use of CEMS, process control, and control equipment. Permit #397-98A requires chlorine dioxide residual to be continuously monitored and recorded. Oxidation reduction potential and PH are separately monitored for each of the scrubbers. Flow rates of the scrubbers are maintained but not recorded; however, process weight rates, temperature of each of the scrubber solution and oxidizer temperature, and pressure drops across scrubbers are monitored and recorded.

DII operates two MMBtu/hr. Cleaver Brooks boilers. The boilers were tested in 2005 to verify respective NOx emission rates while firing with alternate fuels, tallow and yellow grease. Boiler #1 has a heat rate input of 51.1 MMBtu/hr., and Boiler #2 has a heat input ratting of 49.1 MMBtu/hr. The boilers are designed to run as a continuous process during normal operating hours, and may operate for extended periods without interruption. Typically, the boilers are designed to operate without add-on control devices for emissions reduction. Exhaust gases from the boilers are released directly to the atmosphere through a 37 inch-diameter vertical exhaust stack lasting 24 hours per day, 6 days per week, and 52 weeks per year.

The Cleaver Brooks boilers are operated under the Permit to Install # 132-032A, and regulated under Boiler MACT, NESHAP JJJJJJ for Area Sources: Industrial, Commercial, and Institutional Boilers (40 CFR part 63, Subpart JJJJJJ) The initial notification report for the boilers was submitted to AQD on June 25, 2012. The Boiler #1 was subject to tune-up using natural Gas as fuel burned during tune-up and

requires biannual tune-up. The tune-up on Boiler #2 was not performed. A targeted date for notification was March 21, 2014. Both boilers require a one-time energy assessment.

DII is a synthetic minor – opt out source. The facility submits MAERS report. The SIP rules applied to regulate the facility include R 336.1201, R 336.1301, and R 910.

INSPECTION NARRATIVE:
I arrived at the DII facility on November 28, 2016, at 1100 hours. The purpose of visit was to conduct an annual compliance inspection of the grease processing operation. Temperature at the hour was 47 F with wind speed 11.5 mph coming from the South. Humidity was 63%. I was admitted onto the facility by Ms. Kelly Thomas. Mr. Jon Elrod joined us for a pre-inspection interview. We went over itemized agenda I presented for the inspection. We discussed the records that MDEQ-AQD needed to see and requested copies of same from DII. The Company indicated most of the requested records were electronically filed. I gave time extension for the company to provide the operation records.

The DII team (Thomas and Elrod) led me through the plant for inspection of emission units. We inspected all the Emission Units listed in permit. We observed that DII maintained the use of permitted processes in running the grease plant. We held a post-inspection interview in the plant. The records requested by AQD were submitted as requested. I left the area at 1230 hours.

COMPLAINT/COMPLIANCE HISTORY:
Darling Ingredients Inc. had citizen complaint in 2015. However, the complaint was resolved.

OUTSTANDING LOV'S:
None

PROCESS DESCRIPTION:
The DII operates the grease recycling process at the Greenfield, Melvindale location. The facility's products include tallow and yellow grease. The facility operates a chemical laboratory for conducting quality control analysis. There are 2 scrubbers and 2 boilers operated under federally and State Implementation Plan regulatory rules.

EQUIPMENT AND PROCESS CONTROLS:
The DII provided updated process control equipment in the Scrubber system in continuous emission monitoring as described in the background discussion. The Company's equipment and process control information is on AQD file.

OPERATING SCHEDULE/PRODUCTION RATE:
The DII was designed to operate full three shifts covering 24 hours, through 7 days per week, and 365 days of the year. However, the company operates one long shift due to business demand.

APPLICABLE RULES PERMIT TO INSTALL #s 397-98A and 132-03A CONDITIONS:
The DII operations were evaluated consistent with each permit conditions. The inspection determined the facility was in:

Per PTI #397-98A
1 DII demonstrated there have been changes or modifications to equipment or process in the FGFACILTY (Rule 336.1201(1)). Response from DII listed notifications relating removals of 8 emission units operated under Permit to Install #397-98A and permit#132-03A. EURAWHOPPER, EUCOOKER, EUSIZING, EUCOOKER, EUSEPARATION, EUCRAX, EUTO, and FGRENDERING had been discontinued and removed from the facility [Response Summary Pg. 1, Item#1]. The changes were verified by AQD.

2. In compliance - DII demonstrated the emissions from FGFACILITY did not exceed (50) odor units per standard cubic foot as determined utilizing methods acceptable to the District Supervisor. [R336.1901] [SC. 1.1]. DII submitted records showing that odor testing was conducted by Derenzo and Associates, Inc in 2004. The testing established the odor level from the 15,000-cfm scrubber was 19 ou, and odor level from the 100,000-cfm scrubber was 6 ou [Response Summary Pg. 2, Item# 2, Binder #1, August Odor Report, Pg. 3].

3. Not applicable-DII discontinued rendering processes and removed EUCOOKERs from the facility. The SC. 1.2 is not applicable [Response Summary, Pg. 2, Item# 3].

4. In compliance – DII demonstrated the permittee did not accept any material that could not be processed within 24 hours. All accepted materials were processed in a structure with odor control equipment. A log (weight sheets) was kept indicating the time of deliveries and was made available for inspection upon request by District Supervisor. The permittee followed the table below for unloading the material based on Ambient Air Temperature. [R336.1901] [SC. 1.3]. Records submitted by DII showed the facility kept a log of weights indicating the time of deliveries and unloading. Records attached indicated the average time lapse between deliveries and unloading was one hour [Binders #1and #2, #3, and #4, Raw Material Logs].

Material	*AAT > 80₀ F	Unloading Time in Hours 50₀ F< AAT< 80₀ F	AAT < 50₀F
Incoming offal rendering vehicles	8	12	24
Incoming fat/bone rendering vehicles and restaurant grease vehicles.	12	16	24

* AAT = Ambient Air Temperature.

5. In compliance - DII's flow meters indicated chlorine dioxide used as an oxidant in each of FGFACILITY's two packed tower scrubbers at a recirculating rate of 100,000 cfm packed tower scrubber solution of 1000 gallons per minute was maintained. A recirculation rate of the 15,000-cfm packed tower scrubber solution of 125 gallons per minute was maintained. [R336.1901] [SC. 1.4]. The permit has no monitoring limits or recordkeeping requirements for this condition. However, visual inspection showed the water circulation meter was running and indicated compliance with circulation rates for the scrubbers.

6. In compliance – DII demonstrated the permittee maintained a pH level in the range of 3-10 in the recirculation scrubber solution for each of the two packed tower scrubbers. [R336.1901] [SC. 1.5]. Records received from DII showed the PH value oscillated between 3.0 and 9.0 readings [Binder #5]

7. In compliance – DII demonstrated the temperature of the recirculating scrubber solution in each of the two packed tower scrubbers did not exceed 110₀ F unless the permittee demonstrated to the satisfaction of the District Supervisor, that other levels insured acceptable odor control. [R336.1901, R336.910] [SC.1.6]. Records submitted by DII showed the highest temperature recorded in the recirculating solution was 70 F [Binder #5].

8. Not applicable – DII did not need to demonstrate the temperature of gasses exiting the incinerator was maintained at a minimum of 1400 ₀ F unless the permittee demonstrated to the satisfaction of the District Supervisor, that other levels insured acceptable odor control. [R336.1901] [SC. 1.7]. DII no longer operates the emission unit.

9. In compliance - DII demonstrated no vehicles containing material to be processed was parked off site of the location unless all residual solid and liquid material had previously been removed by cleaning. [R336.1901] [SC. 1.8]. Response from DII stated no vehicles containing material to be processed was parked off site of the location unless all residual solid and liquid material had previously been removed by cleaning. Visual inspection confirmed there were no vehicles parked off site [Response Summary, Item #9].

10. In compliance – DII demonstrated all offal vehicles were tarped while in transit. [R336.1901] [SC. 1.9]. Response received from DII stated all offal vehicles were tarped while in transit. Staff did not see any offal vehicle on the facility during the inspection [Response Summary, Item # 10].

11. In compliance – DII demonstrate permittee cleaned the plant floor area and outside the building of

animal byproducts, restaurant grease and trap grease spillage on a daily basis or more often if required, such that odors from these sources were minimized. [R336.1901][SC. 1.10]. Response from DII stated the facility was cleaned and maintained, as needed to minimize odors. Staff walked through the plant during the unannounced inspection visit and confirmed the facility's state of maintenance and cleanliness was adequate.

12. In compliance – DII demonstrated the cleaning of delivery vehicles and containers was conducted in an area and in a manner, which prevented any residue from collecting in stagnant condition capable of decomposition and generation of odorous emissions. The permittee adhered to the procedures listed in Appendix A for cleaning trucks, yard and adjacent roadways e.g. water, steam, detergent, etc. [R336.1901] [SC. 1.11]. Response from DII stated delivery vehicles and containers were cleaned in an area and manner which prevented any residue from collecting in a stagnant condition capable of decomposition and generation of odorous emissions [Response Summary, Item #12].

13. In compliance -DII did not need to demonstrate in the event of a process malfunction where processing or odor abatement equipment did not operate, permittee notified the District Supervisor within four hours of such use indicating the maximum time required for repairs. Incoming material processed was not accepted after four hours of downtime if repairs were anticipated to exceed eight hours. [R336.1901, R336.1912] [SC. 1.12]. DII stated no process malfunction occurred [Response Summary, Item #13]

14. In compliance - DII demonstrated the permittee maintained a chlorine dioxide residual in the scrubber solution at a concentration greater than or equal to 0.1 parts per million (ppm). The residual was continuously monitored and recorded for each scrubber in a manner and with instrumentation acceptable to the Air Quality Division. All the residual chlorine dioxide records were kept on a file for a period of at least five years and made available to the Department upon request. [R336.1901] [SC. 1.13]. Records submitted by DII showed the lowest chlorine dioxide residual reading was 0.12 as recorded from the 1500 cfm scrubber on January 14, 2015 [Response Summary, Item #14; Binder #5].

15. In compliance – DII did not need to demonstrate a violation of the special conditions No.(s): 1.1, 1.3, 1.6, 1.7, 1.8 & 1.15 automatically triggered the permittee's obligation to sell excess rendering material necessary to insure compliance with said conditions. [R336.1901] [SC. 1.14]. Response from DII stated no violation of special conditions occurred that triggered the permittee's obligation to sell excess rendering material during the requested timeframe. The facility no longer operates rendering process for animal materials [Response Summary, Item #15].

16. In compliance - DII demonstrated upon verbal notification of receipt of an odor complaint from the Department, the permittee implemented an odor investigation pursuant to the process management program. The permittee provided a written summary of the odor investigation results to the District Supervisor within 30 days of the date of the complaint. This summary included, but was not limited to an explanation of the complaint, the investigation procedures, results of the investigation, and steps that were taken to resolve the complaint. [R336.1901] [SC.1.15]. Response from DII stated Darling received one verbal notification of an odor complaint from the MDEQ within the most recent two years. DII submitted an odor investigation report to MDEQ-AQD on September 2, 2015 [Binder #15].

17. In compliance - DII demonstrated permittee did not operate FGFACILITY unless the air-cooled condenser, chlorine dioxide system, and the three packed tower scrubbers were installed and operating properly. [R336.1901] [SC. 1.16]. Records received from DII showed the logs of operational performance for the chlorine dioxide and the two packed tower scrubbers that indicated proper installation and operation of the equipment [Binder #15].

18. Not applicable – DII did not need to demonstrate the permittee did not operate the EUCOOKER portion of FGFACILITY unless the venturi scrubber and thermal oxidizer were installed and operating properly. [R336.1901][SC. 1.17]. The emission unit had been removed from the facility since 2014 [Binder #1].

19. In compliance – DII demonstrated when FGRENDERING was not in operation only the 100,000-cfm scrubber were used to control odors from FGOILS, and only the 15,000-cfm scrubber were used to control odors from the loading/unloading process. [R336.1901][SC. 1.18]. Response summary stated the FGRENDERING was removed, however the facility operated the 100,000-cfm scrubber to control odors from FGOILS and operated the 15,000-cfm scrubber to control odors from the loading/unloading process

[response summary, Item #19].

20. Not applicable - DII did not need to demonstrate when FGRENDERING was in operation and the outside ambient temperature was less then 50o F, the 60,000-cfm packed tower scrubber was turned off to protect the packed tower scrubber from freeze-up. [R336.1901] [SC. 1.19]. The emission flexible group had been removed from the facility since 2014 [Binder #1].

21. In compliance – DII demonstrated all building openings, above ground, other than access doors and make up air supply louvers, were sealed to prevent exfiltration of odorous emissions. [R336.1901][SC. 1. 20]. Response from DII stated all building openings, other than access doors and make up air supply louvers, were sealed to prevent exfiltration of odorous emissions [Response Summary, Item #21].

22. In compliance - DII demonstrated all man doors, except maintenance doors, were equipped with automatic closure devices and maintained in good repair. [R336.1901][SC. 1.21]. Response from DII stated all man doors, except maintenance doors, were equipped with automatic closure devices and maintained in good repair [Response Summary, Item #22]. Staff confirmed all man doors were equipped with automatic open and closure devices.

23. In compliance – DII demonstrated all bay doors were kept closed except during loading and unloading. [R336.1901][SC. 1.22]. Response from DII stated all bay doors were kept closed except during loading and unloading [Response Summary, Item #23]. Staff observed all bay doors were kept closed.

24. In compliance - DII demonstrated the permittee maintained FGFACILITY in compliance with all sections of the Malfunction Abatement Program and work practices listed in Appendix A. The permittee also maintained the required devices and operating parameters, monitored and recorded the operating parameters and implemented the malfunction abatement plan, for each piece of odor control equipment and chlorine dioxide oxidation system equipment, according to the plan. The District Supervisor, Air Quality Division was notified of significant modifications to the operation of the odor control equipment or chlorine dioxide oxidation system, in writing, within 15 days of the modification. [R336.1901, R336.1910][SC. 1.23]. Response from DII stated permittee maintained FGFACILITY in compliance with all sections of the MAP and work practices. The permittee maintained the required devices and operating parameters and implemented the MAP for each odor control equipment and chlorine dioxide oxidation system equipment. No significant modification to operation of the odor control equipment or chlorine dioxide oxidation system occurred during the timeframe. The MAP is attached [Binder #5], Response Summary, Item #24].

25. In compliance – DII demonstrated the permittee conducted testing for compliance required by Special Condition 1.1 under the operating conditions specified in Special Condition 1.18. The testing was conducted when the ambient temperature exceeded 80o F. By June 1st, 2004, the permittee submitted a complete test plan to the AQD for review. The final plan was approved by the AQD prior to testing. Verification of the emission rates included the submittal of a complete report of the results to the AQD within 60 days following the date of the test. [R336.1901][SC. 1.24]. Response from DII stated permittee contracted Derenzo and Associates, Inc. to conduct odor testing on the scrubber exhaust emission control systems (15,000 cfm scrubber and 100,000 cfm scrubber) at the facility in August 2004.The results showed both scrubbers emitted odor at less than 50 odor units per standard cubic foot. The same odor results were submitted to the MDEQ on September 1, 2004 [Binder #1; Response Summary, Item # 25].

26. In compliance – DII demonstrated the permittee continuously monitored and recorded separately for each of the three packed tower scrubbers, the Oxygen Reduction Potential (ORP) of the recycled scrubber solution in a manner and with instrumentation acceptable to the Air Quality Division. The Oxygen Reduction Potential was maintained in accordance with the Malfunction Abatement Plan and Process Management Program. [R336.1901, R336.1910][SC. 1.25]. Response from DII showed data listing how continuous monitoring of the parameters was accordingly recorded [Binder # 5; Response Summary, Item #26].

27. Not applicable – DII did not need to demonstrate the permittee installed, calibrated, maintained and operated in a satisfactory manner a device to monitor and recorded the temperature in combustion chamber of the thermal oxidizer on a continuous basis. [R336.1901, R336.1910][SC. 1.26]. The equipment had been removed from the facility since 2014.

28. Not applicable – DII did not need to demonstrate records were kept on a daily basis of the outside ambient temperature and any subsequent shutdowns of the 60,000-cfm packed tower scrubber to prevent plant freeze-up. These records were kept on file for a period of five years and made available to the Department upon request. [R336.1901][SC. 1.27]. The equipment has been idled since 2014 when the EUCOOKER operation ceased/discontinued.

29. In compliance – DII demonstrated records were kept on an hourly basis for the packed tower scrubbers indicating pH, Oxygen Reduction Potential (ORP) and the operating temperature of the scrubber solution. All these records were kept on file for a period of five years and made available to the Department upon request. [R336.1901, R336.1910][SC. 1.28]. The records showing compliance with this condition are in Binder #5 [Response Summary, Item #29].

30. Not applicable – DII did not need to demonstrate records were kept on any hourly basis for the thermal oxidizer/waste heat boiler indicating operating temperature of the incineration section. All these records were kept on file for a period of five years and made available to the Department upon request. Installation of temperature monitoring ports and location of permanent temperature monitoring equipment had prior approval by the District Supervisor, Air Quality Division. [R336.1901][SC. 1.29]. This equipment had been removed from the facility since 2014.

31. In compliance – DII demonstrated the following stack dimensions in FGFACILITY, FGOILS and FGRENDERING complied with the permitted designs: Staff verified the exhaust gases were discharged unobstructed vertically upwards to the ambient air through the following stacks [SC. 1-30a-SC. 1.30d]:

Stack ID	Max. ID (inches)	Minimum Height (feet)	Applicable Requirement
SV100KSCRUBBER	80	75	R336.1901[SC. 1.30a]
SV60KSCRUBBER	60	67	R336.1901[SC. 1.30b]
SV15KSCRUBBER	60	63	R336.1901[SC. 1.30c]
SVOXIDIZER	32	62	R336.1901[SC. 1.30d]

Per PTI# 132-03A: Emission Unit ID Emission Unit Description Stack Identification
EU-Boiler1: 51.1 MMBtu/hr. Cleaver-Brooks Boiler, Associated stack-SV-Boiler1
EU-Boiler2: 49.1 MMBtu/hr. Cleaver-Brooks Boiler, Associated stack- SV-Boiler2
EU-TO: 18 MMBtu/hr.
Thermal oxidizer with heat recovery boiler for controlling odors from facility, associated stack - N/A
DII stated no changes were made to stack dimensions since installation was completed even after the FGRENDERING units were removed.

32. In compliance - DII demonstrated the maximum NOx emissions from FG-Boilers did not exceed 89.4 tons per year. based on 12-month rolling time period, as determined at the end of each calendar month (R336.1205(1)(a) & (3).
Note: Permittee shall calculate NOx emissions from FG-Boilers based on the worst-case emission factors from GC 13 or the emission factors below: Natural Gas Emission Factors NOx = 0.100 lb./MMBtu Fuel Oil Emission Factors NOx = 0.140 lb./MMBtu Yellow Grease Emission Factors NOx = 0.137 lb./MMBtu Tallow Emission Factors NOx = 0.135 lb./MMBtu [SC.1.1]. The data submitted by DII showed emission compliance with the limit, the highest NOx emission was registered to be 2.40 tons per consecutive 12-month and observed as calculated at the end of months of November 2015 and December 2015 [Binder # 5, Last page]. AQD accepts the calculation basis consecutive 12-month to be synonymous with a 12-month rolling time period.

33. In compliance – DII demonstrate the permittee only burned natural gas, #2 fuel oil, yellow grease, and tallow in FG-Boilers. [R336.1205(1)(a) & (3), R336.1224, R336.1225, R336.1901] [SC. 1.2]. Records submitted by DII showed fuel usage logs in reference of natural gas, No. 2 fuel oil, yellow grease and tallow indicating the facility did not deviate for use of permitted fuels [Binder

#5].

34. In compliance – DII demonstrated the sulfur content of all fuel oil used in FG-Boilers did not exceed 0.05 percent by weight. [R336.1205(1)(a) & (3)][SC.1.3]. Records submitted by DII showed no fuel oil was supplied to the facility [Binder #5, Last page].

35. In compliance – DII demonstrated the permittee kept, in a satisfactory manner, monthly and a previous 12-month rolling time period records of natural gas usage, in cubic feet, fuel oil usage, in gallons, yellow grease usage, in gallons, and tallow usage, in gallons, for FG-Boilers. All records were kept on file for a period of at least five years and made available to the Department upon request. [R336.1205(1)(a) & (3), R336.1225, R336.1901] [SC. 1.4]. Records submitted by DII showed records were kept in a satisfactory manner of monthly and previous 12-month rolling time period or consecutive 12-month usage of natural gas, in cubic feet, fuel oil usage in gallon, yellow grease usage in gallons, and tallow usage, in gallons for the FGBOILERS [Binder #5].

36. In compliance – DII demonstrated permittee calculated the NOx mass emission rate from FG-Boilers in tons per month and tons per a 12-month rolling time period on a monthly basis. [R336.1205(1)(a) & (3)] [SC. 1.5]. Records submitted by DII confirmed permittee calculated NOx emission rate from FG-BOILERS in tons per month and tons per 12-month rolling time period on a monthly basis [Binder #5].

37. In compliance – DII demonstrated the permittee kept, in a satisfactory manner, monthly and a previous 12-month NOx emission record, as required by SC 1.1, for FG-Boilers. All records were kept on file for a period of at least five years and made available to the Department upon request. [R336.1205(1)(a) & (3)][SC. 1.6]. Records submitted by DII showed permittee kept, in a satisfactory manner, monthly and a previous 12-month NOx emission record, as required by SC 1.1, for FG-Boilers [Binder #5].

38. Not applicable – DII did not need to demonstrate the permittee maintained a complete copy of the sulfur content analysis, as supplied by the fuel oil vendor, for each shipment of fuel oil, prior to firing in FG-Boilers. All records were kept on file for a period of at least five years and made available to the Department upon request. [R336.1205(1)(a) & (3)][SC. 1.7]. Records submitted by DII showed no fuel oil was supplied to the facility [Binder #5].

39. In compliance -DII demonstrated the exhaust gases from FGBOILERS were discharged unobstructed vertically upwards to the ambient air through the following stacks: [SC. 1.8]: DII stated there were no changes or modifications made to the two Boilers' stack dimensions since installation was completed-

Stack & Vent ID	Max. DI (inches)	Minimum Height (feet)	Applicable Requirement
SV-Boiler1	36	50	R336.1901[SC. 1.8a]
SV-Boiler2	36	50	R336.1901 [SC. 1.8b]

Discussion: Regulatory Summary

40 CFR 63, Subpart JJJJJJ - This rule applies to the 2 Cleaver Brooks boilers located at the facility. The boilers are subject to initial notification report requirements under the NESHAP for Area Sources and tune-up work practice standards. However, the DEQ has not accepted delegation for enforcement of this standard.

Rule 201: The DII operates the processes under two permits: The PTI 397-98A that cover the animal material recycling, and the PTI # 132-03A that cover the 2 Cleaver Brooks boilers installed at the facility.

Rule 301: The facility had experienced fewer PM and associated odor emission issues following the removal of emission units and FGRENDERING equipment.

Rule 901: The facility removed or ceased to operate most of the units that posed to emit odors and nuisance to the environment. Current process operates scrubbers and chlorine dioxide for odor controls. An odor complaint was last received at the facility in 2015. An odor investigation conducted

resolved the complaint and led to further removal of flexible groups that associated to odor emissions. At the time of inspection, there was no issue with odor emission in the plant and outside the facility operating boundaries.

Rule 912: The facility is required to furnish a malfunction abatement plan (MAP) for odor and associated nuisances that are likely to be emitted from the process. A MAP was developed and submitted to the DEQ-AQD. The document is on file.

Rule 910: DII observed the conditions set in the permits for installing and operating control devices in a satisfactory manner. Maintenance and operational records were kept in the manner stipulated.

POLLUTANT EMISSIONS PER MAERS 2016 REPORT (TPY):
MAERS REPORT REVIEW:

The DII facility's 2016 MAERS was reviewed. The report indicated the overall emissions decreased from the previous year inventory. DII is in compliance with MAERS reporting requirements.

CONCLUSION:
The inspection of Darling Ingredients Inc. facility was conducted. The facility was determined to have operated in compliance with permit recordkeeping requirements. In summary, the inspection determined the DII operated in compliance with the permit No. PTI # 397-98A and PTI# 132-03A conditions.

NAME _____ DATE 9/11/2017 SUPERVISOR JK