

REGULATORY AUTHORITY
OF THE
SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT
OVER
THE SACRAMENTO RENDERING COMPANY

Sacramento Rendering Company (SRC) is a business that has operated in Sacramento County since 1913. It has been at its current location on Kiefer Boulevard since the 1950s. SRC receives restaurant grease and animal waste materials and renders them into products used in the manufacturing of many everyday items such as soaps, cosmetics, candles, and animal feed.

Given the nature of the operations at SRC, the facility is regulated by a number of agencies, including the Sacramento Metropolitan Air Quality Management District (SMAQMD). The SMAQMD's role in regulating SRC is to ensure that SRC follows federal, state, and local air pollution control regulations designed to protect the public health.

The principal method by which the SMAQMD regulates SRC is through a permit to operate. This permit requires SRC to operate in accordance with specific conditions. These conditions are enforced by regular compliance inspections. Due to the number of odor complaints the SMAQMD receives regarding SRC, the facility is inspected frequently to ensure that it is operating in full compliance with permit conditions.

The surrounding land uses have changed considerably since SRC began operating at its current location. More recently, the County of Sacramento approved a large residential project in the Sunrise/Douglas area. When that development was approved by the Sacramento County Board of Supervisors, an agreement was reached between the developer, Sacramento County, and SRC to install an enhanced odor control system prior to the issuance of any building permits for structures located downwind of the plant. This particular odor control system was not required by any air pollution control regulations – it was a voluntary effort by the developer and SRC to reduce odors already known to exist around the plant. Even though this equipment was voluntarily installed, it is still subject to SMAQMD permitting requirements to ensure that it meets local, state, and federal emission requirements.

SRC has indicated that the odor control equipment it installed is a state-of-the-art system that takes air from the rendering process through a combination of chemical and thermal treatments to reduce pollutants and odors. The primary air pollutants emitted from rendering operations are Volatile Organic Compounds (VOCs). There are many different types of VOCs which may be emitted, including organic sulfides, disulfides and aromatic compounds. Given the low odor detection threshold for some compounds and varying sensitivities among individuals who may detect odor downwind of the plant, it is possible to detect odors from SRC even though the odor

control equipment is being operated within design specifications and in full compliance with SMAQMD permit conditions.

In addition to its authority to establish permit conditions to limit the discharge of air pollutants from facilities, the SMAQMD has a nuisance rule (Rule 402) that, under most scenarios, would apply when a facility operating in compliance with permit conditions is still causing a public odor nuisance. However, California Civil Code Section 3482.6, "The Right to Farm Act", specifically exempts agricultural processing facilities and rendering plants from nuisance rules. Consequently, if SRC is operating within the limits of its SMAQMD permit and the SMAQMD receives odor complaints, the SMAQMD has no authority to take an enforcement action against the facility.

However, the SMAQMD has worked with SRC in an effort to lessen odor impacts on the community, and SRC is interested in hearing from surrounding residents, businesses, and the general public with comments and/or concerns about their operations. To this end, SRC has established a 24-Hour Hotline 1-800-339-6493 for reporting concerns. The hotline is staffed during business hours and voice mail after hours. You can also email SRC at airyourthoughts@SRCCompanies.com or contact them by mail at 11350 Kiefer Boulevard; Mather, CA 95830. Additional information on SRC also is posted on a website maintained by the County of Sacramento at http://www.saccounty.net/community-services/SAC_COS_DF_SacRenderingCo#1.

In summary, to ensure SRC properly operates its odor control equipment, the SMAQMD conducts regular inspections of the plant. Under certain conditions, odors may be detected even when this equipment is operated properly. Given the limitations of the SMAQMD's authority as it relates to rendering plants, odors alone do not constitute a violation of existing SMAQMD regulations.

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