

Feed Mill Environmental Opportunities

Jamie Burr

Summary of Topics

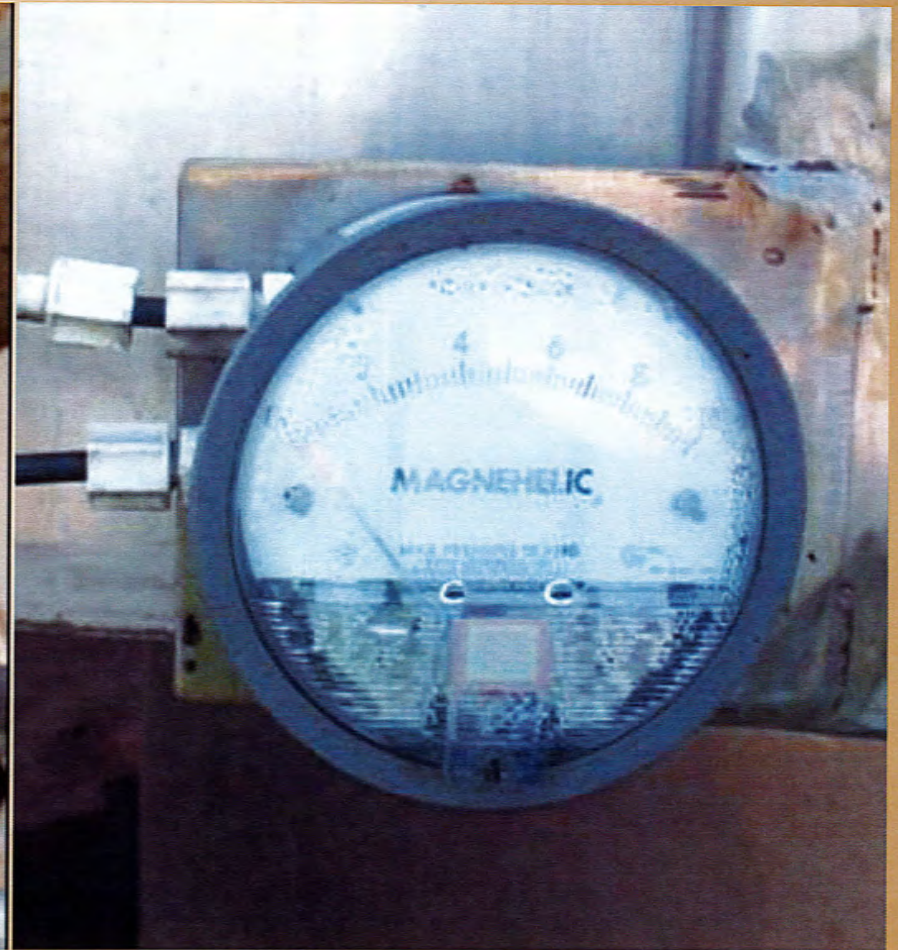
- Air Permitting / Regulations
- Storm Water
- RCRA
- EPCRA
- SPCC

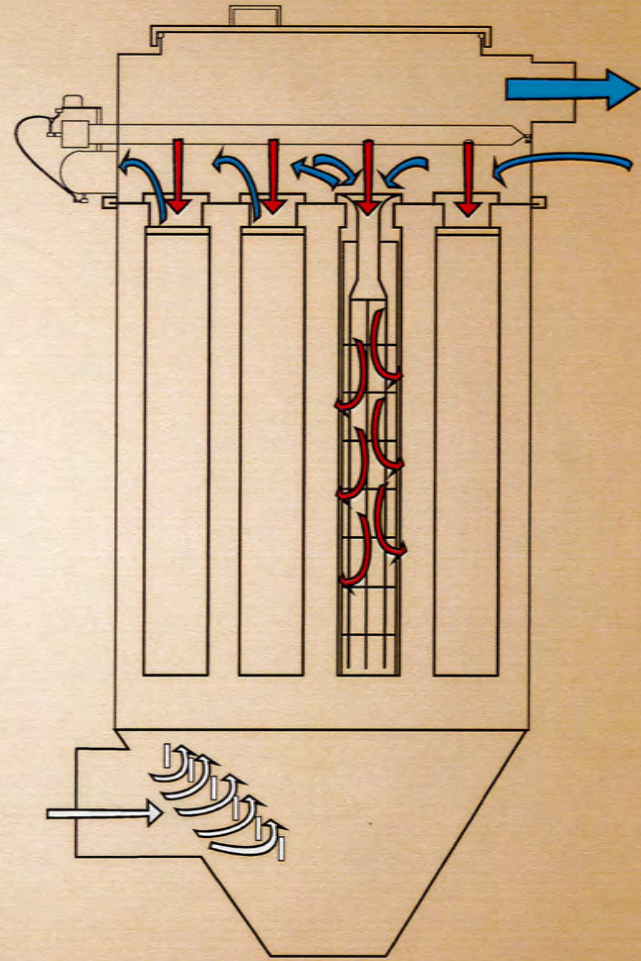
Clean Air Act

- Potential to Emit (PTE) calculations.
 - Up to date? Current processes? Include HAPS?
 - Current AP-42 factors?
- NSPS for boilers – ‘constructed’ OR “reconstructed” after June 1989.
 - 50% rule.
 - Cost aggregation (EPA guidance suggests 3-5 years).
 - Fuel Usage.
 - SSM log.

Clean Air Act

- Bag house operation.
 - Operated according to manufacturer?
 - PM program in place?
 - Purge valves operating properly?
 - Bags (filters) replaced when they need to be?
 - Magnehelic gauges working properly?

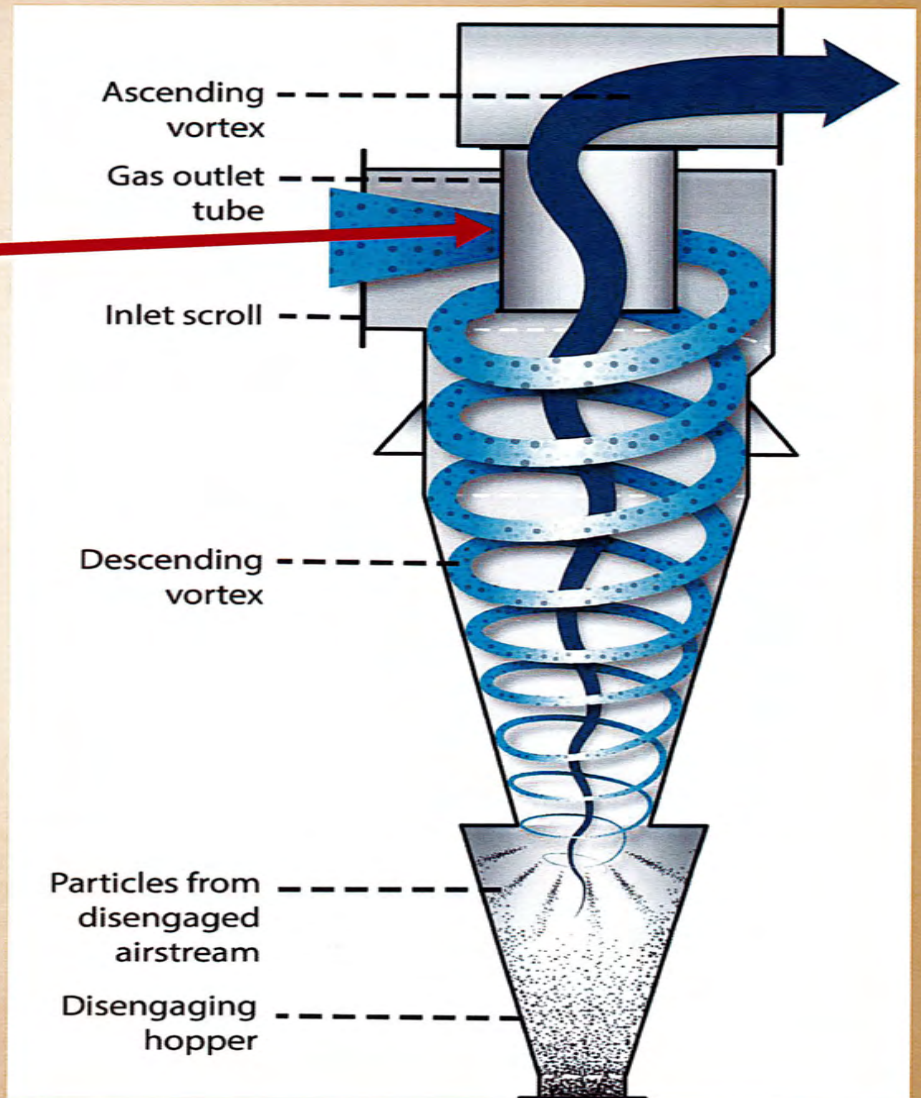






Cyclone Operation

- If this tube rusts or holes wear in it, the cyclone will short circuit.
- Pin holes (leaks in cyclone) will reduce efficiency.
- Sledge hammer is an enemy!



Clean Air Act – NESHAP 7D

- Cyclones operating according to manufacture specification?
 - Air Leaks in ducting / cyclone body.
 - Air lock working properly?
 - Internal components.
- Daily Inspections – varies based on construction date.
- House Keeping.
 - Manual sweeping, low pressure air, vacuuming, etc.
 - Ingredients sealed up.
- Doors shut

NESHAP 7D – Feed Mill Doors

- “You must keep exterior doors in the immediate affected areas shut except during normal ingress and egress, as practicable.....except.....where finished product is stored in closed containers, and not other materials containing chromium or manganese are present.”

NESHAP 7D – Feed Mill Doors

- Tyson requested EPA to reconsider the rule due to make up air restriction to cyclones and heat inside the mill (worker health issue).
- EPA said they would not open the rule, but would be open to issuing an applicability determination.
- Note: During our conversations EPA stated that their interpretation is that doors in the ‘immediate affected areas’ be closed when the mills is not operating!

Applicability Determination – Summary of Letter

- Agreed to allow louvers.
- Have to open inward.
- Only open when negative pressure is in place – cannot be fixed.
- Agreed that as long as the above items conditions were met, the requirements of 7D would be met.

Louvers Installed





Storm Water

- Permit & SW3P up to date?
- DMR's filed on time? Signed by correct person?
- State notification after exceedance?
- SW3P modified after benchmark exceedance?
- Additional requirements for 303(d) / TMDL streams?
- Inspections up to date?
- Annual comprehensive evaluation.
- Identified issues from inspections resolved?
- All pollution sources identified?











L-Threonine

Food Grade

Guaranteed Analysis

L-Threonine (minimum) 98.5%

Moisture (maximum) 1.5%

Manufactured by Archer Daniels Midland Company.

ADM Decatur, IL (Made in U.S.A.)

25 kg (55.1 lbs)

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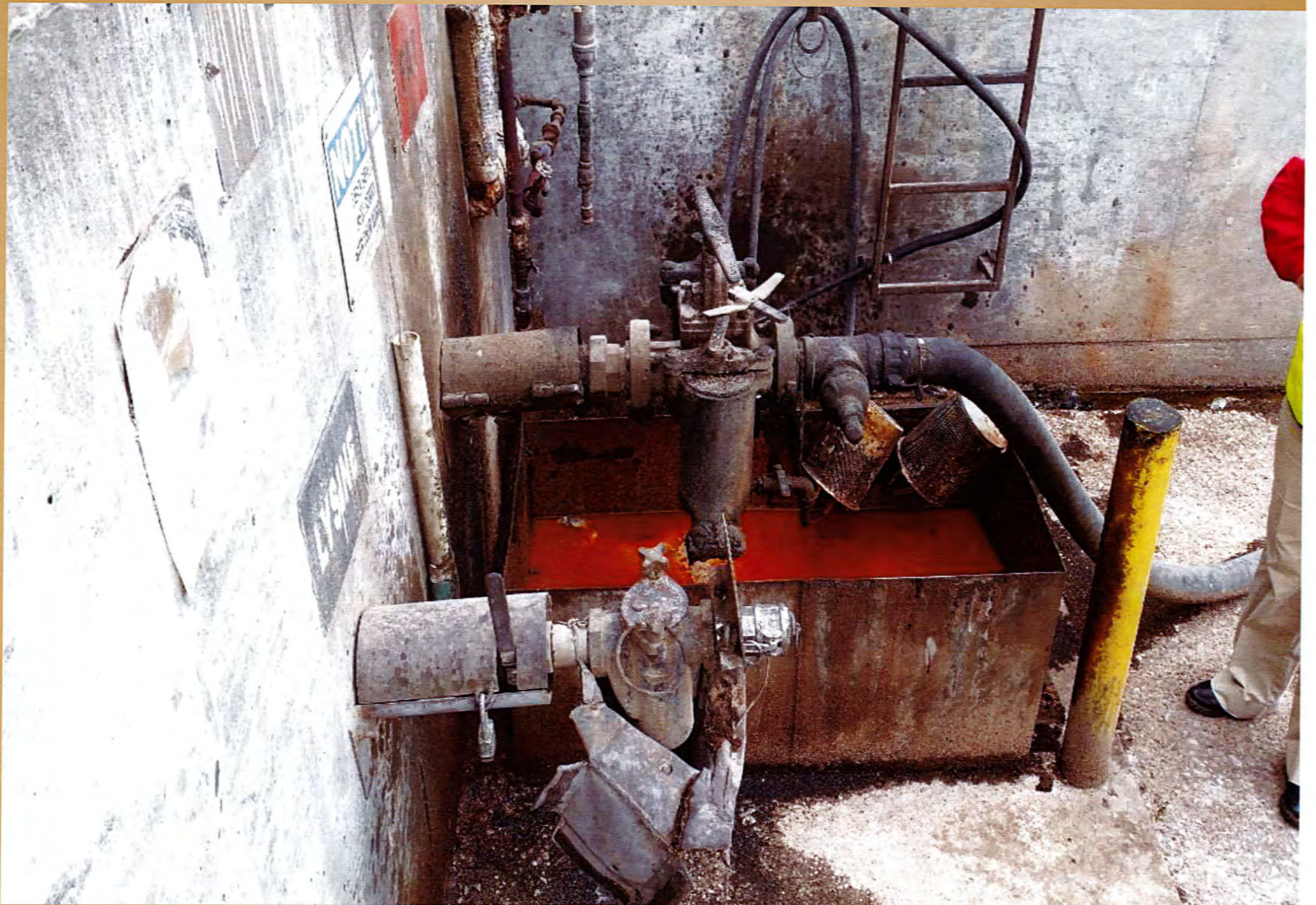
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RCRA

- Waste Determination completed?
- Haz / Universal Waste stored correctly?
- CESQG / SQG threshold?
- What are some POTENTIAL hazardous wastes?
 - Certain ingredient spills.
 - Take a close look at testing for Aflatoxins.

EPCRA

- Evaluation of all ingredients / chemicals to ensure they appear on Tier 2 report?
- New ingredients – notification to LEPC / SERC?
- Copper, Zinc, and Manganese reported?
- Formaldehyde?
- Live production using warehouse space for other storage such as litter treatment.

SPCC

- Is a plan required?
- Review / updates?
- Inventory of oil correct?
- Facility diagrams correct?
- Tanks have alarm or visual monitoring?
- Secondary containment calculations correct?
- Condition / cleanliness of secondary containment?
- Tank inspections up to date?

Summary

- Same environmental programs apply to the mill as a plant – it's just a different process.
- Improperly operated air pollution control devices can become a storm water issue.
- Don't overlook RCRA.
- Lastly, what day do chickens like the least?
 - Fry-day

Questions?

I am no cook. But I can follow the directions. Which said to let the bird chill in the sink for a few hours.

