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# Air Enforcement: Alabama Department of Environmental Management and Houston County Incinerator Operator Enter into Consent Order

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The Alabama Department of Environmental Management (“ADEM”) and Renegades Meat Processing LLC (“Renegades”) entered into a December 15th Consent Order (“CO”) addressing an alleged violation of an ADEM air regulation.

The CO provides that Renegades operates an incinerator in Houston County, Alabama (“Site”).

The incinerator is stated to be operated under the authority of an ADEM Registration Number that was issued on November 8, 2021.

ADEM is stated to have received a complaint on October 21, 2021, concerning the daily burning of animal remains that produced a very acidic smell from the direction of the Site.

An inspection was conducted which noted the following:

- The inspector observed the incinerator emitting an excessive amount of smoke.
- The inspector informed the Owner of the requirements of regulations concerning visible emissions and that the incinerator must be registered with the Department.
- The Owner agreed to register the incinerator and control the emissions within the guidelines of the regulations immediately.

Renegades submitted to ADEM on November 8, 2021, a completed ADEM form 52 that registered the incinerator. However, on November 12, 2021, ADEM issued a warning letter due to excessive smoke it is stated to have observed emanating from the incinerator during the November 3, 2022, inspection.

A second complaint was subsequently received by ADEM stating that Renegades was using a large grill to burn animal carcasses that produced offensive odors and smoke.

ADEM personnel are stated to have conducted a subsequent inspection and noted the following:

- The inspector immediately observed excessive emissions emanating from the incinerator stack.
- The Owner was asked why the visible emissions were so high and responded that the afterburner was not functioning due to a shortage in the system.
- The Owner further explained that it was actively working on the issue and would have it fixed as soon as possible.

On August 18th, ADEM issued a Notice of Violation for alleged operation without an afterburner and requested a response detailing why the incinerator was being improperly operated. Renegades responded reiterating that the problem was with the afterburner and that it was not aware that this equipment was malfunctioning until after the incinerator was loaded.

Renegades neither admits nor denies ADEM's contentions.

The CO assesses a civil penalty of \$4,000.

A copy of the CO can be downloaded [here](#).