



**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 8-2642-00003/00009  
Effective Date: 03/31/2016 Expiration Date: 03/30/2026

Permit Issued To: BAKER COMMODITIES INC  
4020 BANDINI BLVD  
LOS ANGELES, CA 90058

Contact: WILLIAM J SCHMIEDER  
BAKER COMMODITIES - ROCHESTER DIVISION  
2268 BROWNCROFT BLVD  
ROCHESTER, NY 14625  
(585) 482-1880

Facility: BAKER COMMODITIES  
2268 BROWNCROFT BLVD  
PENFIELD, NY 14625

Description:

This facility, located at 2268 Browncroft Blvd. in the Town of Penfield, converts inedible meat processing animal by-products to meal, tallow, oil, and grease, and also processes spent restaurant grease into a saleable product.

Equipment and operations at the plant include: A grinder to reduce material to a slurry; a steam heated cooker to break down the by-products to soluble, insoluble, and volatile components; a condenser for the water component of the volatiles; a press to aid separation of fat solids from the remaining solids; a hammer mill for meal production from the remaining solids; and a centrifuge and filter for tallow production from the separated fats. In addition, spent restaurant grease processing operations include a grease cooker, screening, sedimentation, and centrifugation equipment, to separate the grease from water and entrained solids.

Water from both the meat by-product and the spent grease processing operations is treated at the facility before discharge to the sanitary sewer. Non condensable volatiles from both operations are directed to thermal and chemical oxidation units for odor control.

Baker Commodities Inc. has installed new chemical injection, control, and monitoring equipment to better eliminate process odor emissions and improve system monitoring. This equipment will also decrease reaction time in correcting operational problems and upset conditions that could potentially result in odorous emissions.



This draft permit/Department Initiated Modification includes the following provisions: contains regulatory changes instituted by the Department since issuance of the previous permit, allows Baker to use #2 fuel oil or yellow grease (used cooking oil) as additional alternate fuels in its largest boiler, incorporates equipment installed by the company to improve emission controls (described above), requires monitoring of these control systems, encompasses an updated Air Quality Operating Procedures Manual, and establishes a complaint response procedure.

Baker Commodities Inc. has also accepted Permit Conditions that restrict this facility's potentials to emit Oxides of Nitrogen (NO<sub>x</sub>) and Sulfur Oxides (SO<sub>x</sub>) to below 50 tons per year (TPY) each (reduced from 100 TPY in the initial permit), which is less than one half of the threshold of applicability for:

6 NYCRR Part 201-6 (Title V) for a Major Stationary Source, and  
6 NYCRR Part 227 Reasonably Available Control Technology (RACT) for NO<sub>x</sub>.  
These Permit Conditions are maintained in this permit, specifying that this facility is not currently subject to these regulations.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator:           KIMBERLY A MERCHANT  
                                          6274 EAST AVON-LIMA RD  
                                          AVON, NY 14414-9519

Authorized Signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_



**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

**Item B: Permittee's Contractors to Comply with Permit**

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

**Item C: Permittee Responsible for Obtaining Other Required Permits**

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

**Item D: No Right to Trespass or Interfere with Riparian Rights**

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

**Facility Level**

- Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS



**DEC GENERAL CONDITIONS**  
**\*\*\*\* General Provisions \*\*\*\***  
**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

**Condition 1: Facility Inspection by the Department**

**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

**Item 1.2:**

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

**Item 1.3:**

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

**Condition 2: Relationship of this Permit to Other Department Orders and Determinations**

**Applicable State Requirement: ECL 3-0301 (2) (m)**

**Item 2.1:**

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

**Condition 3: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

The permittee must submit a renewal application at least 180 days before expiration of permits for both Title V and State Facility Permits.

**Item 3.3:**

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

**Condition 4: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.13**

**Item 4.1:**

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification,



suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

**\*\*\*\* Facility Level \*\*\*\***

**Condition 5: Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS**

**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator  
Region 8 Headquarters  
Division of Environmental Permits  
6274 Avon-Lima Road  
Avon, NY 14414-9519  
(585) 226-2466

**New York State Department of Environmental Conservation**

Permit ID: 8-2642-00003/00009

Facility DEC ID: 8264200003



**Permit Under the Environmental Conservation Law (ECL)**

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY  
PERMIT**

**IDENTIFICATION INFORMATION**

Permit Issued To:BAKER COMMODITIES INC  
4020 BANDINI BLVD  
LOS ANGELES, CA 90058

Facility: BAKER COMMODITIES  
2268 BROWNCROFT BLVD  
PENFIELD, NY 14625

Authorized Activity By Standard Industrial Classification Code:  
2077 - ANIMAL AND MARINE FATS AND OIL

Permit Effective Date: 03/31/2016

Permit Expiration Date: 03/30/2026



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 201-7.1: Facility Permissible Emissions
- \*2 6 NYCRR 201-7.1: Capping Monitoring Condition
- \*3 6 NYCRR 201-7.1: Capping Monitoring Condition
- 4 6 NYCRR 225-1.2: Compliance Demonstration

#### Emission Unit Level

##### EU=1-CMBST

- 5 6 NYCRR 227-1.3 (a): Compliance Demonstration

##### EU=1-CMBST,Proc=005

- 6 6 NYCRR 211.1: Compliance Demonstration

### STATE ONLY ENFORCEABLE CONDITIONS

#### Facility Level

- 7 ECL 19-0301: Contaminant List
- 8 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 9 6 NYCRR Subpart 201-5: Emission Unit Definition
- 10 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 11 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 12 6 NYCRR 211.1: Air pollution prohibited
- 13 6 NYCRR 211.1: Compliance Demonstration
- 14 6 NYCRR 211.1: Compliance Demonstration
- 15 6 NYCRR 211.2: Visible Emissions Limited
- 16 6 NYCRR 225-1.2 (e): Compliance Demonstration
- 17 6 NYCRR 225-1.2 (f): Compliance Demonstration

#### Emission Unit Level

- 18 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 19 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

##### EU=1-CMBST,Proc=004

- 20 6 NYCRR 211.1: Compliance Demonstration
- 21 6 NYCRR 211.1: Compliance Demonstration

##### EU=1-SCRBR

- 22 6 NYCRR 211.1: Compliance Demonstration
- 23 6 NYCRR 211.1: Compliance Demonstration
- 24 6 NYCRR 211.1: Compliance Demonstration
- 25 6 NYCRR 211.1: Compliance Demonstration

NOTE: \* preceding the condition number indicates capping.





**FEDERALLY ENFORCEABLE CONDITIONS**  
**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability**

**Item A: Sealing - 6 NYCRR 200.5**

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

**Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6**

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

**Item C: Maintenance of Equipment - 6 NYCRR 200.7**

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications,



required to operate such device effectively.

**Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2**

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

**Item E: Emergency Defense - 6 NYCRR 201-1.5**

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.



(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

**Item F: Recycling and Salvage - 6 NYCRR 201-1.7**

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

**Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8**

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

**Item H: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)**

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

**Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)**

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

**Item J: Required Emission Tests - 6 NYCRR 202-1.1**



An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

**Item K: Open Fires Prohibitions - 6 NYCRR 215.2**  
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

**Item L: Permit Exclusion - ECL 19-0305**  
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

**Item M: Federally Enforceable Requirements - 40 CFR 70.6 (b)**  
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**FEDERAL APPLICABLE REQUIREMENTS**  
**The following conditions are federally enforceable.**

**Condition 1: Facility Permissible Emissions**



**New York State Department of Environmental Conservation**

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Facility DEC ID: 8264200003



**Item 2.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 2.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Sulfur dioxide emissions cannot exceed 50 tons per year based on a 12 month rolling summary. Records will be maintained showing the monthly and annual facility fuel usage, and the calculation of monthly and annual SO<sub>2</sub> emissions using the following AP-42 emission factors:

0.6 pounds of SO<sub>2</sub> emitted per million dry standard cubic feet of natural gas combusted

157 pounds of SO<sub>2</sub> emitted per thousand gallons of number 6 fuel oil combusted multiplied by the % of sulfur in the oil combusted, and

142 pounds of SO<sub>2</sub> emitted per thousand gallons of number 2 fuel oil combusted multiplied by the % of sulfur in the oil combusted.

Also, 0.018 pounds per hour of SO<sub>2</sub> emitted per hour of operation with yellow grease combusted.\*

\*Note-emission factor based on Baker Commodities Inc. Kewanee Boiler Source Testing conducted on February 14-15, 2001.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

Subsequent reports are due every 12 calendar month(s).

**Condition 3:      Capping Monitoring Condition**



Effective between the dates of 03/31/2016 and 03/30/2026

Applicable Federal Requirement:6 NYCRR 201-7.1

**Item 3.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

6 NYCRR Subpart 227-2

**Item 3.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 3.3:**

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

**Item 3.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 3.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 3.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 3.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Oxides of nitrogen emissions cannot exceed 50 tons per year on a twelve month rolling summary basis. Records will be maintained showing the monthly and annual facility

**New York State Department of Environmental Conservation**

Permit ID: 8-2642-00003/00009

Facility DEC ID: 8264200003



fuel usage, and the calculation of monthly and annual NOx emissions using the following AP-42 emission factors:

100 pounds of NOx emitted per million dry standard cubic feet of natural gas combusted

55 pounds of NOx emitted per thousand gallons of number 6 fuel oil combusted.

24 pounds of NOx emitted per thousand gallons of number 2 fuel oil combusted.

Also, 3.49 pounds of NOx emitted per hour of operation with yellow grease combusted\*.

\*Note-emission factor based on Baker Commodities Inc. Kewanee Boiler Source Testing conducted on February 14-15, 2001.

Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2017.  
Subsequent reports are due every 12 calendar month(s).

**Condition 4: Compliance Demonstration**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable Federal Requirement:6 NYCRR 225-1.2**

**Item 4.1:**  
The Compliance Demonstration activity will be performed for the Facility.

**Item 4.2:**  
Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Owners and/or operators of a stationary combustion installation that fires distillate oil other than number two heating oil are limited to the purchase of distillate oil with 0.0015 percent sulfur by weight or less on or after July 1, 2014 and are limited to the firing of distillate oil including number two heating oil with 0.0015 percent sulfur by weight or less on or after July 1, 2016.

The department will require fuel analyses, information on





the quantity of fuel received, fired or sold, and results of stack sampling, stack monitoring, and other procedures to ensure compliance with the provisions of this Subpart. All records must be maintained at the facility for a minimum of five years.

Facility owners subject to this Subpart must submit a written report of the fuel sulfur content exceeding the applicable sulfur-in-fuel limitation, measured emissions exceeding the applicable sulfur-in-fuel limitation, measured emissions exceeding the applicable equivalent emission rate, and the nature and cause of such exceedances if known, for each calendar quarter, within 30 days after the end of any quarterly period in which an exceedance takes place.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL  
Parameter Monitored: SULFUR CONTENT  
Upper Permit Limit: 0.0015 percent by weight  
Monitoring Frequency: PER DELIVERY  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: QUARTERLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 4/30/2016.  
Subsequent reports are due every 3 calendar month(s).

\*\*\*\* Emission Unit Level \*\*\*\*

**Condition 5: Compliance Demonstration**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable Federal Requirement:6 NYCRR 227-1.3 (a)**

**Replaces Condition(s) 20, 21, 23, 24**

**Item 5.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-CMBST

**Item 5.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No owner or operator of a combustion installation shall

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operate the installation in such a way to emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test Method 9 in Appendix A of 40 CFR 60.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 6: Compliance Demonstration**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 6.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-CMBST

Process: 005

**Item 6.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The boiler will be operated in accordance with the Air Quality Operating Procedures Manual, dated March 28, 2016.

The exit temperature gauge shall be operational, properly maintained, and calibrated. When odorous gases are being ducted, firebox temperature, as measured by the gauge, shall be a minimum of 1350° F.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1350 degrees Fahrenheit

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



**STATE ONLY ENFORCEABLE CONDITIONS**  
**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability**

**Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)**

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

**Item B: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**

**Condition 7: Contaminant List**  
**Effective between the dates of 03/31/2016 and 03/30/2026**



**Applicable State Requirement:ECL 19-0301**

**Item 7.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

**Condition 8: Malfunctions and start-up/shutdown activities  
Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable State Requirement:6 NYCRR 201-1.4**

**Item 8.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that



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such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 9: Emission Unit Definition**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 9.1:**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-CMBST

Emission Unit Description:

This emission unit consists of a 45 MMBtu/hr natural gas-fired boiler (EP00009) with no. 6 or no. 2 fuel oil, or yellow grease as an alternative fuel, a 25 MMBtu/hr natural gas-fired boiler (EP00010), and a 10 MMBtu/hr natural gas-fired thermal oxidizer (EP00004) used to control captured odor emissions from the continuous dry rendering process equipment and meal grinding room. The EP00009 boiler is used as a back-up thermal oxidizer when EP00004 is down.

Building(s): R PLANT

**Item 9.2:**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-SCRBR

Emission Unit Description:

Three (3) scrubber system that controls rendering plant interior odor. The VC-10 scrubber (EP00006, 35,250 cfm) treats air from the raw material receiving and main processing areas. VC-11, the SCP control scrubber, (EP00007 - 60,000 cfm) treats air from the raw material receiving, main processing, and yellow grease areas. VC-12, SCP control scrubber (EP00008 - 60,000 cfm) treats air from the grease area, grinding floor and wastewater area.

Building(s): R PLANT

**Condition 10: Renewal deadlines for state facility permits**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable State Requirement:6 NYCRR 201-5.2 (c)**

**Item 10.1:**

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

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**Condition 11: Compliance Demonstration**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable State Requirement:6 NYCRR 201-5.3 (c)**

**Item 11.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources  
NYS Dept. of Environmental Conservation  
Region 8  
6274 East Avon-Lima Rd.  
Avon, NY 14414

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 12: Air pollution prohibited**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 12.1:**

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

**Condition 13: Compliance Demonstration**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 13.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 13.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



Monitoring Description:

Baker shall continue to implement operating procedures outlined in the 'Air Quality Operating Procedures Manual', version dated March 28, 2016. The manual shall be reviewed and revised, as necessary, to initiate corrective action of recognized emission related problems. The Department must be provided in writing any revisions to the document within thirty days of implementing such operating changes or revisions. Any revision or modification to the 'Air Quality Operating Procedures Manual' is subject to approval by the New York State Dept. of Environmental Conservation. Minimally, an annual review of the 'Manual' is required. An updated copy of the manual or a notification of "no change" to the document must be submitted to the Region 8 office of the NYSDEC by January 31 of each year.

Noncompliance with provisions outlined in the 'Air Quality Operating Procedures Manual' shall constitute a violation of the Air State Facility permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

Subsequent reports are due every 12 calendar month(s).

**Condition 14: Compliance Demonstration**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 14.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall establish a complaint response procedure to manage complaints related to air emissions from this facility. The procedure shall be designed to ensure that complaints from officials or neighbors are adequately received and documented, and that appropriate response is taken by the facility. The facility shall:

1. Have a complaint line of communication available 24 hours a day, 7 days a week.
2. Investigate any possible causes of any complaint received.
3. Take prompt action to abate any circumstance which is



- found to be the cause of the complaint.
4. Fully document the complaint, results of investigation, and any action taken.
  5. Report in a format acceptable to the Department within two business days of the complaint.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 15: Visible Emissions Limited**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 15.1:**

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**Condition 16: Compliance Demonstration**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable State Requirement:6 NYCRR 225-1.2 (e)**

**Item 16.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 16.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Owners and/or operators of any stationary combustion installation that fires residual oil are limited to the purchase of residual oil with a sulfur content of 0.50% sulfur on or after July 1, 2014 and to the firing of residual oil with a sulfur content of 0.50% on or after July 1, 2016.

Data collected pursuant to this Subpart must be tabulated and summarized in a form acceptable to the Department, and must be retained for at least five years. The owner of a Title V facility must furnish to the Department such records and summaries, on a semiannual calendar basis, within 30 days after the end of the semiannual period. All other facility owners or distributors must submit these records and summaries upon request of the Department.



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Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: RESIDUAL FUEL (#4, #5 AND/OR #6 FUEL OIL)  
Parameter Monitored: SULFUR CONTENT  
Upper Permit Limit: 0.50 percent by weight  
Monitoring Frequency: PER DELIVERY  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 17: Compliance Demonstration**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable State Requirement: 6 NYCRR 225-1.2 (f)**

**Item 17.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 17.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

Owners and/or operators of commercial, industrial, or residential emission sources that fire number two heating oil on or after July 1, 2012 are limited to the purchase of number two heating oil with 0.0015 percent sulfur by weight or less. Compliance with this limit will be based on vendor certifications.

Data collected pursuant to this Subpart must be tabulated and summarized in a form acceptable to the Department, and must be retained for at least five years. The owner of a Title V facility must furnish to the Department such records and summaries, on a semiannual calendar basis, within 30 days after the end of the semiannual period. All other facility owners or distributors must submit these records and summaries upon request of the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: NUMBER 2 HEATING OIL  
Parameter Monitored: SULFUR CONTENT  
Upper Permit Limit: 0.0015 percent by weight  
Monitoring Frequency: PER DELIVERY  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

\*\*\*\* Emission Unit Level \*\*\*\*

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**Condition 18: Emission Point Definition By Emission Unit**  
Effective between the dates of 03/31/2016 and 03/30/2026

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 18.1:**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-CMBST

Emission Point: 00004  
Height (ft.): 30 Diameter (in.): 24  
NYTMN (km.): 4781.521 NYTME (km.): 294.729 Building: R PLANT

Emission Point: 00009  
Height (ft.): 30 Diameter (in.): 36  
NYTMN (km.): 4781.521 NYTME (km.): 294.729 Building: R PLANT

Emission Point: 00010  
Height (ft.): 28 Diameter (in.): 36  
NYTMN (km.): 4781.5 NYTME (km.): 294.7 Building: R PLANT

**Item 18.2:**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-SCRBR

Emission Point: 00005 Removal Date: 05/01/2008  
Height (ft.): 26 Length (in.): 24 Width (in.): 24  
NYTMN (km.): 4781.521 NYTME (km.): 294.729 Building: R PLANT

Emission Point: 00006  
Height (ft.): 46 Diameter (in.): 48  
NYTMN (km.): 4781.521 NYTME (km.): 294.729 Building: R PLANT

Emission Point: 00007  
Height (ft.): 35 Diameter (in.): 58  
NYTMN (km.): 4781.521 NYTME (km.): 294.729 Building: R PLANT

Emission Point: 00008  
Height (ft.): 41 Diameter (in.): 60  
NYTMN (km.): 4781.5 NYTME (km.): 294.7 Building: R PLANT

**Condition 19: Process Definition By Emission Unit**  
Effective between the dates of 03/31/2016 and 03/30/2026

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 19.1:**

This permit authorizes the following regulated processes for the cited Emission Unit:



Emission Unit: 1-CMBST  
Process: 001 Source Classification Code: 1-02-006-02  
Process Description:  
Process 001 consists of a Cleaver-Brooks/D-52-R-4, 45 MMBtu/hr boiler (EP00009). During this process, the boiler fires natural gas, and provides building heat and process steam for the facility when the primary boiler (25 MMBtu/hr) is down.

Emission Source/Control: 45BLR - Combustion  
Design Capacity: 45 million Btu per hour

**Item 19.2:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-CMBST  
Process: 002 Source Classification Code: 1-02-004-02  
Process Description:  
Process 002 consists of a Cleaver-Brooks/D-52-R-4, 45 MMBtu/hr boiler (EP00009). This boiler is the same as described in process 001, however it is fired with #6 or #2 Fuel Oil, or yellow grease. During this process, it provides building heat and process steam for the facility when the primary boiler (25 MMBtu/hr) is down.

Emission Source/Control: 45BLR - Combustion  
Design Capacity: 45 million Btu per hour

**Item 19.3:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-CMBST  
Process: 003 Source Classification Code: 1-02-006-02  
Process Description:  
Process 003 consists of a Cleaver-Brooks/C8426X-600, 25 MMBtu/hr, natural gas-fired boiler (EP00010). This primary boiler is used to provide building heat and process steam for the facility.

Emission Source/Control: 25BLR - Combustion  
Design Capacity: 25 million Btu per hour

**Item 19.4:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-CMBST  
Process: 004 Source Classification Code: 3-02-038-01  
Process Description:  
Process 004 consists of rendering operations using the 10MMBtu/hr oxidizer and a vapor condensers (EP00004) to control captured odor emissions. Process equipment and areas controlled by the oxidizer include the cooker,

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presses, centrifuges, tallow work tanks, drainer, elevators and conveyors, non-condensables, and the meal grinding room.

Emission Source/Control: CDSR1 - Control  
Control Type: VAPOR RECOVERY SYS(INCL. CONDENSERS,HOODING, OTHER ENCLOSURES)

Emission Source/Control: OXIDR - Control  
Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: COOKR - Process

Emission Source/Control: RNDR1 - Process

**Item 19.5:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-CMBST  
Process: 005 Source Classification Code: 3-02-038-01  
Process Description:

Process 005 consists of rendering operations using the 45 MMBtu/hr boiler (EP00009) to control captured odor emissions. Process equipment and areas controlled by the boiler include the cooker, presses, centrifuges, tallow work tanks, drainer, elevators and conveyors, non-condensables, and the meal grinding room.

Emission Source/Control: 45BLR - Combustion  
Design Capacity: 45 million Btu per hour

Emission Source/Control: CDSR1 - Control  
Control Type: VAPOR RECOVERY SYS(INCL. CONDENSERS,HOODING, OTHER ENCLOSURES)

Emission Source/Control: COOKR - Process

Emission Source/Control: RNDR1 - Process

**Item 19.6:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-SCRBR  
Process: 006 Source Classification Code: 3-02-038-01  
Process Description:

Process 006 consists of rendering operations which utilize (3) scrubbers that control odor emissions from the process. The VC-10 scrubber (EP-00006, 35,250 cfm) treats air from the raw material receiving and main processing areas. VC-11, the SCP control scrubber (EP00007 - 60,000 cfm) treats air from the raw material receiving, main

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processing, and yellow grease areas. VC-12, SCP control scrubber (EP00008 - 60,000 cfm), treats air from the grease area, grinding floor and wastewater area.

Emission Source/Control: CDSR6 - Control  
Control Type: VAPOR RECOVERY SYS(INCL.  
CONDENSERS,HOODING, OTHER ENCLOSURES)

Emission Source/Control: SCB6A - Control  
Control Type: SPRAY TOWER

Emission Source/Control: SCB6B - Control  
Control Type: PACKED-GAS ABSORPTION SYSTEM

Emission Source/Control: SCBR5 - Control  
Control Type: PACKED-GAS ABSORPTION SYSTEM

Emission Source/Control: SCBR7 - Control  
Control Type: PACKED-GAS ABSORPTION SYSTEM

Emission Source/Control: RNDR2 - Process

**Condition 20: Compliance Demonstration**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 20.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-CMBST  
Process: 004

**Item 20.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The afterburner (incinerator) will be operated in accordance with the Air Quality Operating Procedures Manual, dated March 28, 2016. The temperature will be monitored continuously and will be maintained at a minimum temperature of 1250 degrees F from September 15-May 15 or as outlined in the Operating Procedures Manual.

Manufacturer Name/Model Number: HONEYWELL / DR4200  
Parameter Monitored: TEMPERATURE  
Lower Permit Limit: 1250 degrees Fahrenheit  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION  
Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT



DURING STARTUP/SHUTDOWN  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 21: Compliance Demonstration**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 21.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-CMBST  
Process: 004

**Item 21.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The afterburner (incinerator) will be operated in accordance with the Air Quality Operating Procedures Manual, dated March 28, 2016. The temperature will be monitored continuously and be maintained at a minimum temperature of 1350 degrees F from May 16-September 14 or as outlined in the Operating Procedures Manual.

Manufacturer Name/Model Number: HONEYWELL / DR4200  
Parameter Monitored: TEMPERATURE  
Lower Permit Limit: 1350 degrees Fahrenheit  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION  
Averaging Method: 24 HOUR MAXIMUM  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 22: Compliance Demonstration**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 22.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SCRBR

**Item 22.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

When the outdoor ambient air temperature drops below 25 degrees F, one of the scrubber systems may be shut down to



prevent freezing inside the plant. An operations log of scrubber shutdowns must be kept on site. The plant operations log must list the date and time of each shutdown, the ambient air temperature at the time of the shut down, and the reason for the shut down (E.G., temperature, maintenance, plant shutdown , etc.).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 23: Compliance Demonstration**  
**Effective between the dates of 03/31/2016 and 03/30/2026**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 23.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SCRBR

**Item 23.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility's scrubber system is comprised of three separate scrubber's:  
The VC-10 scrubber (EP-00006, 35,250 cfm) treats air from the raw material receiving and main processing areas;  
VC-11, the SCP control scrubber (EP00007 - 60,000 cfm), treats air from the raw material receiving, main processing, and yellow grease areas, and  
The VC-12, SCP control scrubber (EP00008 - 60,000 cfm) treats air from the grease area, grinding floor and wastewater area.

Odor suppression success is dependent upon liquid circulation flow to system spray towers. The individual system pump flow rates must be consistently maintained and monitored continuously during plant operation. A flow reading below the limit shall prompt immediate corrective action. The corrective action shall be recorded in the plant operations log.

Parameter Monitored: FLOW RATE

Lower Permit Limit: 500 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT

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DURING STARTUP/SHUTDOWN  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 24: Compliance Demonstration**  
Effective between the dates of 03/31/2016 and 03/30/2026

**Applicable State Requirement:6 NYCRR 211.1**

**Item 24.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SCRBR

**Item 24.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility's scrubber system is comprised of three separate scrubbers- VC-10, VC-11, and VC-12. Odor suppression success is dependent upon the liquid Oxidation Reduction Potential (ORP) and circulation flow to system spray towers. Individual ORP levels must be consistently maintained during plant rendering operations and monitored continuously. ORP readings outside the specified limits shall prompt immediate corrective action. The corrective action shall be recorded in the plant operations log. Recorded data must be provided to the Department upon request.

Parameter Monitored: VOLTAGE

Lower Permit Limit: 600 millivolts

Upper Permit Limit: 850 millivolts

Monitoring Frequency: CONTINUOUS

Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED  
RANGE EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 25: Compliance Demonstration**  
Effective between the dates of 03/31/2016 and 03/30/2026

**Applicable State Requirement:6 NYCRR 211.1**

**Item 25.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SCRBR

**Item 25.2:**

Compliance Demonstration shall include the following monitoring:



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Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility's scrubber system is comprised of three separate scrubber's- VC-10, VC-11, and VC-12. Odor suppression success is dependent upon disinfection capacity/flow to the spray towers. To maintain adequate odor treatment, individual system circulating water pH levels must be consistently maintained and monitored continuously during plant rendering operations. PH readings outside of the specified limits shall prompt immediate corrective action. The corrective action shall be logged into the plant operations log.

Parameter Monitored: PH

Lower Permit Limit: 6.0 pH (STANDARD) units

Upper Permit Limit: 9.9 pH (STANDARD) units

Monitoring Frequency: CONTINUOUS

Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED

RANGE EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

