



Prepared Feeds Manufacturing Area Source NESHAP

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Introduction

- NAICS 31119
 - Prepared animal feeds manufacturing (except dog and cat)
- Listed for regulation under section 112(k)
 - HAP: chromium compounds and manganese compounds



Background

- 1,800 facilities
- Most of these are considered small businesses
 - Small business definition is <500 employees
 - 98% have <100 employees
 - 43% have <10



Emissions

○ Baseline emissions

- PM: 32,000 tons/year
- PM2.5: 7,500 tons/year
- Manganese compounds: 100 tons/year
- Chromium compounds: 2 tons/year

○ Potential emitting processes

- Pre-mix storage of chromium and manganese compounds
- Mixing of milled grains with other ingredients including chromium and manganese compounds
- Pelleting and pellet cooling
- Bagging
- Bulk loading



Proposed Subcategorization

- Observed differences between facilities based on size
 - “Small” facilities: production rate of ≤ 50 tons per day
 - “Large” facilities: production rate of > 50 tons per day



Proposed GACT

- Management practices and equipment standards for all new and existing facilities
 - General: minimizing dust containing HAP and equipment maintenance
 - Storage area: store raw materials containing HAP in closed containers
 - Mixing operations: materials containing HAP added in manner to reduce emissions; mixer covered at all times except when adding materials.
 - Bagging: General requirements
 - Bulk loading operations: filter drop socks must be used when loading product containing HAP into trucks or railcars



Proposed GACT (cont.)

- Installation of cyclone with at least 95% efficiency for PM10 at pelleting and pellet cooling operations for existing and new facilities with average daily feed production levels > 50 tons per day



Emissions Reductions

○ From installation of cyclones

- PM: 4,000 tons/yr
- PM2.5: 900 tons/yr
- Chromium and manganese compounds: 11 tons/yr



Total Costs

- Management practices
 - Believe all facilities already implement
 - No additional costs anticipated
- Installation of cyclone at large facilities (estimate 32 facilities):
 - Nationwide capital costs: \$3 million
 - Nationwide annual costs: \$4 million



Proposed Notification, Recordkeeping, and Reporting Requirements

- Initial Notification: basic information about facility and its operations (submitted 120 days after publication)
- Notification of Compliance Status: Statement that source has complied with all relevant standards (submitted 120 days after compliance date)
- Records must be kept of all notifications, each cyclone or drop filter sock inspection, and each pressure drop monitoring event
 - Cyclone pressure drop to be recorded daily
 - Cyclones to be inspected quarterly
 - Drop socks to be inspected monthly



Proposed Notification, Recordkeeping, and Reporting Requirements (cont.)

- Monthly certification that all management practices have been followed
- Annual compliance certification to be maintained on site
 - If cyclone pressure drop outside proper operating range, report submitted to EPA (by March 15 of the same year)
- Records to be kept for at least 5 years, the first 2 onsite



Applicability Recommendations

- Exclude facilities that don't add chromium or manganese compounds during processing
- No HAP use or emissions, only initial notification



Contact Information

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Comments to Docket:

ID No. EPA-HQ-OAR-2008-0080

www.epa.gov/oar/docket.html. Follow the instructions for submitting comments.

E-mail: a-and-r-Docket@epa.gov. Include Docket ID No. in the subject line.

Fax: (202) 566-9744, Attention Docket ID No. EPA-HQ-OAR-2008-0080.