



Prepared Feeds Manufacturers and the EPA

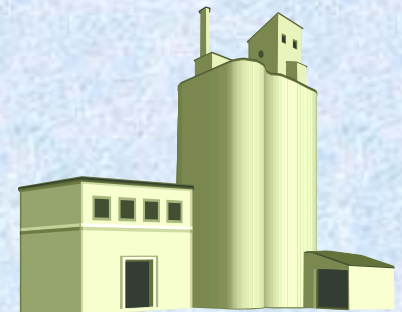
**Leslye Werner
Air Toxics Coordinator
Region 7 EPA**



Prepared Feeds Manufacturing

Does this rule apply to me?

- Do you use materials containing Chromium (Cr) and Manganese (Mn)?
- “Animal Feed Production” > 50% of Annual Production at your facility (by mass)?
 - Includes Feed Products
 - Feed Ingredients
 - Premixes and Additives
 - Concentrates
 - Does not include Dog and Cat Food

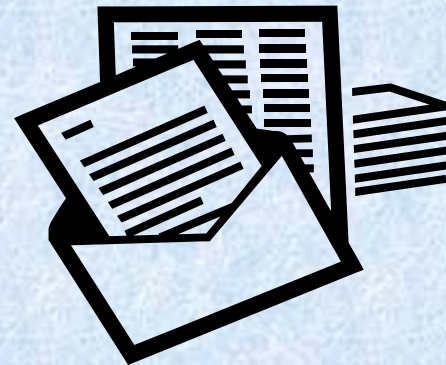




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What dates do I need to know?

- Initial Notifications were due – May 5, 2010
- Compliance Dates –
 - Existing Sources – January 5, 2012
 - New Sources – at Startup
- Notice of Compliance Status due –
 - Existing Sources – May 4, 2012
 - New Sources – within 120 days of Startup

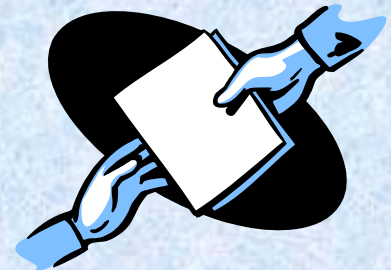
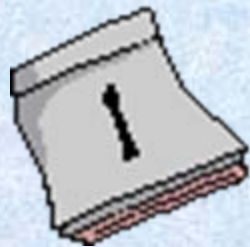




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Any additional paperwork?

- Annual Compliance Certification
 - Due by March 1 each year
- If you no longer use Cr or Mn
 - Notify us that you are no longer subject





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What do I need to do?

General Standards

For all materials that contain Cr and Mn

- Minimize Dust with Housekeeping
- Properly maintain or operate Process Equipment
 - According to Manufacturers Specifications
 - In a way to minimize dust





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What do I need to do?

Process Area Standards

For all materials that contain Cr and Mn

- Storage Areas –
 - Store in Closed Containers
- Mixing Operations –
 - Add to mixer carefully to reduce emissions
 - Cover mixer, except when adding materials





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What do I need to do?

Process Area Standards (Continued)

For all materials that contain Cr and Mn

- Bulk Loading Processes –
 - Prepared feed products loaded into trucks or railcars
 - Loadout End of bulk loader
 - Need device to lessen fugitive emissions
 - Reduce the distance between loading arm and truck or railcar





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What do I need to do?

Pelleting/Pellet Cooling Standards

For all materials that contain Cr and Mn

- Your Average Daily Feed Production > 50 tons/day
 - Install and Operate Cyclone
 - Reduces Emissions from Pellet Operations
- Average Daily Feed Production = Average amount produced each day for one year





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What do I need to do?

Pelleting/Pellet Cooling Standards (continued)

For all materials that contain Cr and Mn

- Cyclone Must Achieve $\geq 95\%$ PM Reduction
- Demonstrate 95% PM Reduction –
 - Manufacturer's Specifications
 - Professional Engineer or Responsible Official Certification
 - Method 5 Performance Test





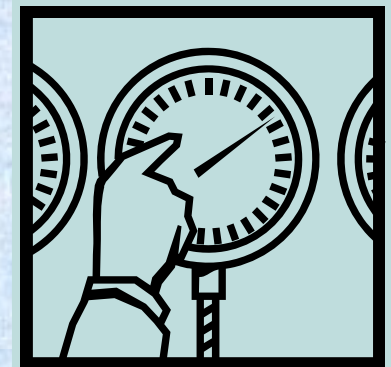
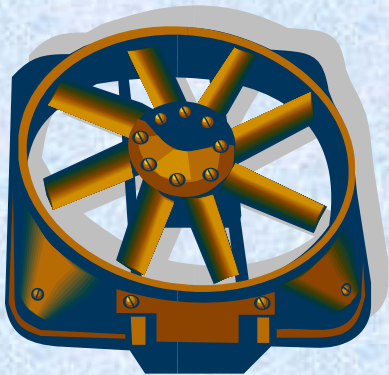
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What do I need to do?

Pelleting/Pellet Cooling Standards (cont'd)

For all materials that contain Cr and Mn

- Establish Parameter Range for each Cyclone
 - Shows Cyclone is Operating Properly
 - Parameter can be:
 - Inlet flow rate
 - Inlet velocity
 - Pressure drop, or
 - Fan Amperage





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What do I need to do?

Monitoring and Compliance Requirements

- Inspect Cyclones Quarterly
- Monitor Cyclone Operating Parameter
 - Record Results Daily
- Inspect Loadout End Devices Monthly





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What do I need to do? Recordkeeping Requirements

- If Average Daily Feed Production \leq 50 tons
 - Maintain Feed Production Records
- If Average Daily Feed Production \geq 50 tons
 - Cyclone Design Records
 - Cyclone Operation Records

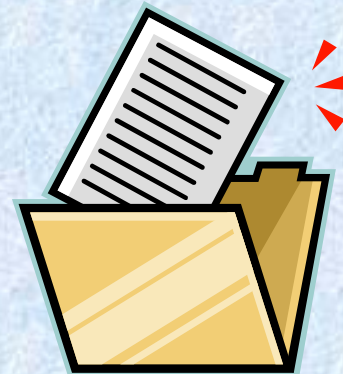
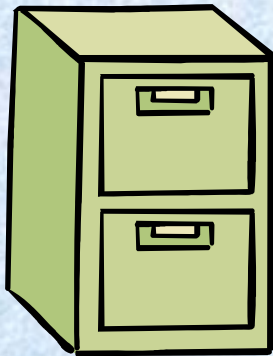




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What do I need to do? Recordkeeping Requirements - All

- Keep Copies of All Previously Mentioned Documents
 - Notifications and Compliance Certifications
- Keep Records in Suitable and Readily Available Form
 - Keep Records for 5 Years
 - Onsite for at least 2 Years





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