



Prepared Feeds Manufacturers and the EPA

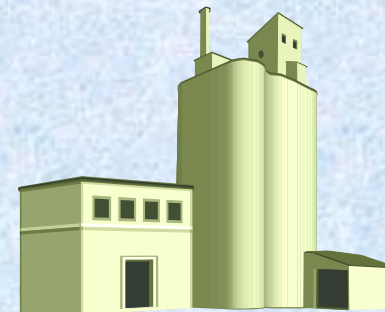
**Leslye Werner
Air Toxics Coordinator
Region 7 EPA**



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**

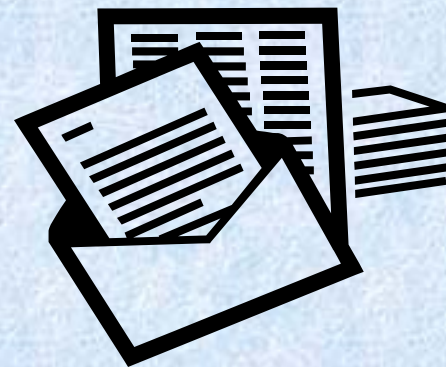




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What dates do I need to know?

- **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 or October 18, 2010, whichever is later***

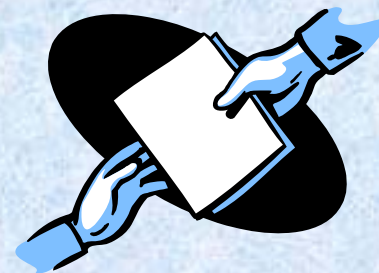




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Any additional paperwork?

- **Annual Compliance Certification**
 - **Prepare by March 1 each year**
 - **Submit if compliance or cyclone operation deviations***
- **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**





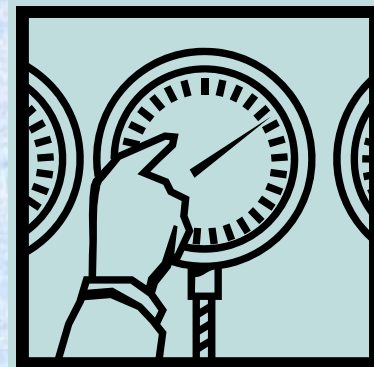
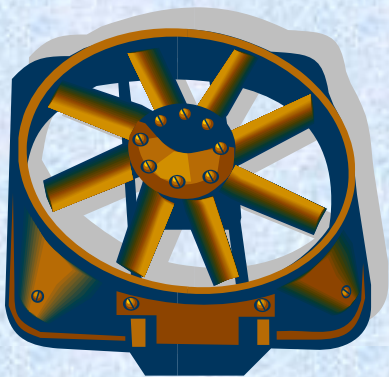
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What do I need to do?

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**



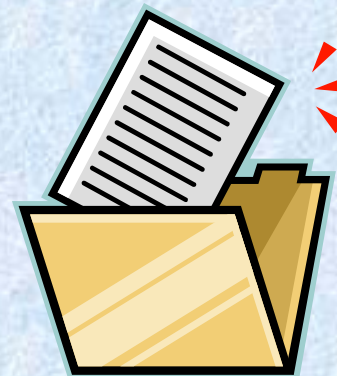
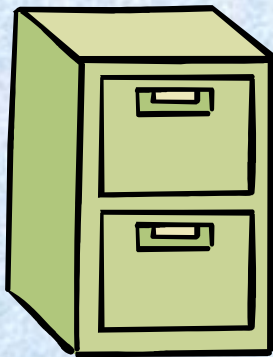


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What do I need to do?

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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Rule Information and Forms:

<http://www.epa.gov/ttn/area/arearules.html>

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