

Appendix B

Odor Management Plan (Revised)

**Diamond Pet Foods –
Ripon**

**942 South Stockton Ave.
Ripon, CA 95366**

~~July 2020~~ March 2021

Prepared by:



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Odor Management Plan

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Prepared for:

Diamond Pet Foods – Ripon
942 South Stockton Avenue
Ripon, CA 95366

~~July 2020~~ March 2021

Table of Contents

1.0	EXECUTIVE SUMMARY	1
2.0	FACILITY INFORMATION	2
3.0	ODOR EMITTING ACTIVITIES.....	3
3.1	Pet Food Production Emissions	3
3.2	Indirect Emission Sources.....	3
3.2.1	<i>Raw Material Odors</i>	<i>3</i>
3.2.2	<i>In-Plant Personnel Areas</i>	<i>4</i>
4.0	PRACTICES TO OPTIMIZE ODOR CONTROL	5
4.1	Durr (Manufacturer) RTO Automatic Maintenance Sequence.....	5
4.2	Administrative Controls: Procedures.....	5
4.2.1	<i>Procedural Activities</i>	<i>5</i>
4.2.2	<i>Staff Training Procedures</i>	<i>8</i>
4.3	Maintenance Frequency: <i>Annual</i> (Per Manufacturer Recommendation).....	9
4.4	Engineering Controls.....	10
4.4.1	<i>Description of Best Available Control Technology (BACT)</i>	<i>10</i>
4.4.2	<i>Components of Engineering Controls</i>	<i>10</i>
4.4.3	<i>Pet Food Production Lines/RTO Process Logic</i>	<i>13</i>
5.0	DPF COMPLAINT TRACKING AND RESPONSE	14
5.1	General Reporting: Facility Overview	14
5.2	Tier 1 Odor Response.....	14
5.3	Tier 2 Odor Response.....	15
5.4	Tier 3 Odor Response.....	16
5.5	DPF Compliance Tracking Flowchart & Contacts.....	18
5.6	Methods for Filing Odor Complaints	20
6.0	OMP PREPARERS AND AGENCY CONTACTS	21
6.1	OMP Preparers	21
6.2	OMP Reviewing Agency (CEQA Lead Agency).....	21
6.3	OMP Review Frequency.....	21
7.0	REFERENCES.....	21

Table of Appendices

APPENDIX A – RIPON AREA CITIZEN ODOR REPORTING OPTIONS

APPENDIX B – ~~ODOR INSPECTION FORMS~~ [RTO PERSONAL ODOR INSPECTION \(POI\) PROCEDURE](#)

APPENDIX C – ~~RTO ODOR SAMPLING/TESTING PROCEDURE~~ [ODOR INSPECTION FORMS](#)

APPENDIX D – SAMPLE ODOR COMPLAINT WEATHER REPORT

APPENDIX E – SAMPLE RTO DAHS MONITORING REPORTS

APPENDIX F – SJVAPCD GUIDELINE: INVESTIGATION OF COMPLAINTS

APPENDIX G – EXCERPT FROM ODOR COMPLAINT TRACKING SHEET

APPENDIX H – SAMPLE MONTHLY ODOR REPORT TO CITY OF RIPON

APPENDIX I – OMP REVIEW TEMPLATE

List of Figures

Figure 4-1: Durr Regenerative Thermal Oxidizer (RTO) Flow Schematic	11
Figure 5-1: Progressive Tier Response Flowchart.....	18

List of Tables

Table 1-1: DPF-Ripon RTO Volatile Organic Compound Sampling/Analysis Protocols	1
Table 1-2: DPF-Ripon RTO Volatile Organic Compound Test Results Summary.....	2
Table 4-1: DPF-Ripon Odor Complaint History vs RTO Installation.....	13

List of Acronyms and Abbreviations

AA	Administrative Assistant
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
DPF-Ripon	Diamond Pet Foods – Ripon
°F	Degrees Fahrenheit
FM	Facility Manager
H ₂ O	Water
HAP	Hazardous Air Pollutant
HEPA	High efficiency particulate air
Hz	Hertz
MAMS	Manufacturer Automatic Maintenance Sequence (equivalent to bakeout or bakeoff)
MDAQMD	Mojave Desert Air Quality Management District
MS	Maintenance Supervisor
OMP	Odor Management Plan
PM	Project Manager
PTO	Permit to Operate
QCM	Quality Control Manager
RTO	Regenerative Thermal Oxidizer
SJVAPCD	San Joaquin Valley Air Pollution Control District
SS	Shift Supervisor
VOC	Volatile Organic Compound

Odor Management Plan

1.0 EXECUTIVE SUMMARY

The purpose of this OMP is to detail the specific activities, best practices, and response measures that will be implemented to prevent exposure of the public to potential odor impacts resulting from the addition of a fourth pet food production line at Diamond Pet Foods-Ripon (DPF-Ripon).

Since mid-2012, DPF-Ripon has produced dry pet food for various clients and markets at their facility located at 942 South Stockton Avenue. Since that time, the local area communities have noticed and complained to the San Joaquin Valley Air Pollution Control District (SJVAPCD) and the City of Ripon about pet food odors in the air.

Diamond has actively sought to remedy the odors, first by installing a Cold Plasma Injection System in 2014, and ultimately, in 2018, by replacing the Cold Plasma Injection System with a Regenerative Thermal Oxidizer (RTO) System consisting of three Durr Systems RL-60 natural gas-fired RTOs. The Durr RL-60 RTO was chosen because the system has the highest odor abatement level, is highly energy efficient, and simple, with only a single moving part (a rotating shaft/valve assembly).

The RTO System was specifically designed to treat 100% of the pet food production odors from all sources of production exhaust which may be associated with anywhere from 1 to 4 simultaneously operating lines. Prior to the installation of odor abatement equipment, the exhausting of odorous pet food production air was incidental to the action of transferring the pet food kibble product through the various manufacturing stages until the product was packaged, sealed, and loaded onto pallets for storage or shipment. Additionally, the RTO System was designed to be, and is now, an integral part of the Plant's operation, as the RTO System was installed with an interlocking operating process logic control function that will not allow pet food production to occur unless the RTO System has sufficient capacity available and is on-line to abate the odorous exhaust.

Since its installation in late 2018, the RTO System has demonstrated, via source testing in January 2019 as well as subsequent testing in May of 2020, removal of over 95% of the volatile organic compounds (VOC), believed to be the source of the odors, ~~at an RTO chamber temperature of 1500 degrees Fahrenheit (degrees F)~~. In spite of ~~this~~ the RTO demonstrating compliance with the 95% VOC abatement requirement at 1,501 F in January 2019, the RTO is operated at a minimum temperature of 1,650 F to ~~maximize~~ optimize the effectiveness of odor abatement. The above-mentioned source testing was conducted according to pre-approved sampling and analysis protocols listed in Table 1-1.

Table 1-1: DPF-Ripon RTO Volatile Organic Compound Sampling/Analysis Protocols

Reference Method	Sample Location	Description of Parameter
CARB-1, 2, 3, 4	Exhaust Stack only	Volumetric Exhaust Stack Flow Rate
EPA Method 3C	RTO Inlet Header, RTO Stack	Concentrations of O ₂ , CO ₂
EPA Modified Method 18	RTO Inlet Header, RTO Stack	C1 – C14 Organic Compounds, (CH ₃) ₂ CO (Acetone)

Table 1-2 presents the 2019 RTO VOC test results as well as the January and May 2020 tests.

Table 1-2: DPF-Ripon RTO Volatile Organic Compound Test Results Summary

<u>Date</u>	<u>RTO Temperature</u>	<u>Average VOC Removal Efficiency</u>
<u>January 23, 2019</u>	<u>1,501 F</u>	<u>97.2 %</u>
<u>January 24, 2019</u>	<u>1,650 F</u>	<u>99.8 %</u>
<u>January 21, 2020</u>	<u>1,710 F</u>	<u>90.2¹ %</u>
<u>May 14, 2020</u>	<u>1,700 F</u>	<u>97.9 %</u>

The above sampling and testing methods resulted in the identification of 136 carbon-based compounds (hydrocarbon/organic compounds) based on the element carbon. As stated previously, it is believed that the odorous compounds are organic compounds, and the odor abatement efficiency is tied directly to the abatement of the organic compounds.

In addition to installing and operating the RTO System, DPF-Ripon developed this site-specific Odor Management Plan (OMP), with which includes procedures to monitor and maintain, on a daily basis, the active and passive systems designed to contain and control any and all identifiable odors from the pet food production activities.

Also contained in this OMP are guidelines to continuously monitor the RTO permit condition parameters as well as the Ripon-area odor complaints and the associated weather during the period when the odors were occurring.

Based on the installation and optimal operations of the RTO units, confirmed odor complaints have been reduced from an average of 24 per year (years 2012 – 2018) to 1 per year (2019 and 2020 average basis) since the RTO was installed, as discussed in Section 4.2.2.

This OMP also includes a progressive response system (Tier 1, Tier 2 and Tier 3) to ensure that any persistent odor issues are appropriately dealt with. ~~To assist the community, Figure 1 presents the steps that local citizens can follow to ensure that DPF-Ripon resources are quickly deployed to inspect and address any odors that may occur.~~

The instructions to guide citizens in filing an odor complaint are also is provided in Section 5.6.

2.0 FACILITY INFORMATION

Diamond Pet Foods, Inc. (Diamond) operates a pet food production facility (DPF-Ripon) located at 942 South Stockton Avenue in Ripon, CA. The primary contact for DPF-Ripon is as follows:

DPF-Ripon Plant Manager: Mark Ferguson
Phone: (209) 662-0569
E-mail: mferguson@diamondpet.com
Address: 942 South Stockton Ave, Ripon, CA 95366

DPF-Ripon produces pet food by measuring and loading the meat, grain, water, and other ingredients into steam conditioner units (one per line) where mixing and pasteurization occurs, followed by forming (extruding) the pet food into kibbles, which are then conveyed from the steam

¹ Disputed VOC removal average was claimed to be due to apparent contamination of the sample probe from Test #1. RTO was therefore retested on 5-14-2020, resulting in a 97.9 % VOC removal efficiency.

conditioners to the dryers and other systems for further processing. At each stage of the production line, the kibble is collected and transported through vacuum tubes to the next part of the process using a blower/cyclone system. Each production line requires four blowers (operating with three exhaust stacks) to allow the vacuum system to move the kibble through the plant. All exhaust from the pet food production processes is collected into an 80-inch diameter exhaust header and routed to an RTO system for abatement.

DPF-Ripon operates 24 hours per day, 7 days per week, and 363 days per year, with two planned holidays per year, Christmas and Easter.

3.0 ODOR EMITTING ACTIVITIES

3.1 Pet Food Production Emissions

Each pet food processing line is capable of manufacturing various pet food kibble based on the production needs and given recipes. The process begins with a specific pet food kibble recipe. Depending on the recipe, an appropriate amount of each material is dispensed from metering bins, mixed, and transferred into steam conditioners. Each recipe may use a protein, such as beef, chicken, lamb, fish, turkey, bison, pork, venison, duck, quail, or pheasant, added to the steam conditioners and thoroughly pasteurized/steam conditioned to release starches, which act as binding agents for the material. The material is then extruded to form pet food kibble. The freshly extruded moist kibble is transferred via food-grade vacuum takeaway tubing to the stainless-steel conveyor belt that dries the kibble by moving the product through the dryer/dryer-cooler which is part of each processing line.

In the natural gas-fired dryer the kibble is dried as it passes through the drier and ultimately cooled in the drier-cooler. The dried kibble is then transferred to the coating process where the product is coated with either chicken fat or canola oil which acts to bind other nutrients, such as dry digest and probiotics. The coated kibble is cooled further in vertical coolers, then transported to the packaging line bins for feeding the packaging equipment. Each of the pet food processing lines has three production exhausts, one each for the extruder (wet) cyclone, dryer cyclone, and vertical cooler cyclone. These exhausts are responsible for the majority of the pet food odors that have been noticed in the Ripon community.

3.2 Indirect Emission Sources

3.2.1 Raw Material Odors

DPF-Ripon receives and stores the raw materials used for the manufacture of the pet food in appropriate silos/bins equipped with baghouses, which are essentially high-powered vacuum cleaner systems appropriately positioned to collect dust particles (particulate) which may be present as the materials are transferred into storage.

~~A small portion of the raw materials are processed through the pre-grind mill, which consists of a hammermill and screen. All material is transferred from the storage and pre-grinding areas by bucket elevators, which feed into the mill tower. All material transfer occurs via enclosed conveyors. All of these materials are received in a dry form, which is readily controlled by the baghouses.~~

Regarding odors associated with the raw materials ingredients, it is noted that the particulate material from the dry raw materials has a slight grain-like odor, ~~although these~~

~~odors are which is~~ generally not considered offensive, as compared with the pet food production (cooking) odors. Since the particulate material has an odor, any control of particulate emissions by the use of baghouses will have the effect of containing the odors, however slight they may be. Since baghouses are installed throughout the facility, the particulate emissions from these materials are minimized, which has the side effect of containing odors as noted above.

~~This-The~~ odor control effect ~~of from~~ the baghouse particulate control occurs throughout the facility, wherever baghouses for PM ~~control abatement~~ are installed and operating.

The meat products are received refrigerated and stored in the refrigerator until used, and thus are an unlikely source for odors. The totes that contain the refrigerated meat are lined with plastic, and once the meat has been transferred into the process, the plastic liners are rinsed and disposed of in the facility dumpsters. As with all garbage dumpsters, there is a possibility of minor garbage-like odors emanating from the dumpsters. However, the dumpsters are located near the RTO units where DPF-Ripon personnel frequent the area, and if an odor is noted from the dumpster, DPF-Ripon will contact the waste collector to pick up and exchange the dumpster. The standard practice is to replace the dumpsters on a weekly basis.

Prior to being mixed and cooked in the steam conditioning units, the raw ingredients are received and stored appropriately either in above-ground silos or bins, or in refrigerated enclosures as in the case of fresh meats which are perishable. Materials stored in the silos include beans, peas, meat meal (various), dried vegetables, grains, etc.

~~Some of~~ As noted previously, some of these raw materials have a slight odor and could contribute indirectly to the odors in the community. However, the storage protocols require vessels to be closed up and for the transport of the raw materials to be abated by particulate-removal systems.

3.2.2 In-Plant Personnel Areas

The vast majority of odorous emissions are from the pet food production exhausts, as noted in §3.1 above. Although these systems are largely enclosed, the various areas inside the production and storage building of the plant are noted to have varying levels of pet food production odors, although not nearly as strong as the odors from the direct production exhausts. Generally speaking, the in-plant personnel areas have a pet food odor that is volumetrically much less than what is produced by the production operations. more or less noticeable, depending on the specific area of the plant. For example, the extrusion room has the strongest pet food odors, but the room is entirely sealed up and any odorous emissions in the room are captured in the product take-up tubes to be ultimately abated by the RTO System.

The odors in the dryer, coating and vertical cooler areas are of a much lower intensity as compared to the odors from either the extruder room or the direct production exhausts. All outside doors to this area are designed to close automatically, and any odors that escape through an open door are brief, of minimal volume (as compared with the production exhaust), and once outside the building are rapidly diluted to levels below detection, before reaching the facility boundary.

Any odors in the packaging lines and product storage areas are even more dilute than the odors of the dryer-coater-vertical cooler room(s) areas and are similar to what might be noticed in a typical pet food aisle of a pet products retail store.

4.0 ODOR CONTROL PRACTICES TO OPTIMIZE ODOR CONTROL

4.1 Durr (Manufacturer) RTO Automatic Maintenance Sequence

The manufacturer automatic maintenance sequence (MAMS), also known as a bakeout is a sequenced procedure which decreases the rotation frequency of the RTO valve thereby allowing the hot RTO exhaust to increase the temperature of the refractory material up to a programmed maximum outlet temperature to “bake-off” any particulate or condensed material that may be on the “coldface” (outlet) of the refractory, which could make the RTO less efficient.

Manufacturer Recommended MAMS Frequency: Durr Systems does not recommend a specific MAMS frequency, noting that every RTO application is different, and a recommended frequency cannot be predicted. Depending on the application, Durr staff have indicated that operators at other facilities have found success with conducting MAMS at a frequency from monthly to semi-annually.

DPF-Ripon MAMS Frequency: As part of the daily RTO inspection, DPF-Ripon notes if any process indicators such as an excessive temperature differences between the RTO inlet and outlet are noted or if odors are prevalent in the RTO area, a MAMS will be conducted. Additionally, DPF-Ripon inspects the actual exhaust of each RTO unit by conducting a personal odor inspection, or POI (as outlined in Appendix B) on each RTO on a daily basis. This provides an invaluable data point for determining if one or more RTOs needs a MAMS. Since there have been no confirmed odor complaints in 2020, we conclude that MAMS are best conducted on an as-needed schedule, based on daily actual odor inspections. An established regular MAMS event, we believe, may be less effective as the highest priority RTO may not be subjected to the MAMS in lieu of the set schedule for a different RTO. Currently, at least one RTO per month is subjected to a MAMS, and this frequency would be automatically increased if the POI showed the need.

~~In order to ensure a MAMS is necessary, DPF may evaluate the RTO exhaust by performing an onsite personal odor inspection (as outlined in Appendix C). If any combination of RTOs is deemed to be more odorous than another, or if the temperature readings indicate reduced efficiency, DPF will initiate a MAMS, which takes the unit offline, and activates the cleanout sequence as desired.~~

There is no limit to the number of MAMS that can be performed as long as the manufacturer automated sequence is followed according to the PLC programmed actions.

~~The typical frequency that DPF routinely follows is to perform at least one MAMS every calendar week.~~

4.2 Administrative Controls: Procedures

4.2.1 Procedural Activities

4.2.1.1 Odor Inspection Procedures – Off-Site: Daily Frequency

~~On a weekly (Monday through Friday) basis~~ When pet food manufacturing is occurring, daily off-site inspections are conducted according to the following protocol. Inspections

are conducted on an increased frequency during times when more odors have typically been reported (i.e., winter). The Facility Manager (FM), Maintenance Supervisor (MS), and/or Quality Control Manager (QCM) or designated qualified alternate staff conducts off-site inspections at the following locations, as needed. (Alternate staff are qualified if they have been trained according to the staff training procedures described below.) If an odor is noted, it will be recorded on the off-site inspection record form and addressed by DPF-Ripon management and staff. Blank inspection forms are provided in Appendix BC.

Following are the locations where the daily and as-needed inspections will occur:

- Laurelwood neighborhood (East of Highway 99);
- Downtown Ripon;
- Highway 99 Corridor (Jack Tone Road to Hammett Road);
- Schools (Ripon Elementary, Ripon High, Ripon Christian Schools, and Ripona Elementary);
- ~~Weather Station: Weather data is reviewed to determine on a real time basis, the general wind direction and speed at the time of the odor complaint;~~
- Other areas around the plant on an as-needed basis.

4.2.1.2 Weather Station Monitoring

A wind direction and speed monitoring system has been installed near the highest point on the hammermill building (tallest building) and is operated on a continuous basis to collect weather data to be used in tandem with the odor complaint records. A sample of the information obtained from this weather station is presented in Appendix D which shows the wind direction and speed at the time of the odor complaint overlaid on a satellite photo of the DPF-Ripon site along with the directional variability associated with the data. This data is developed and carefully reviewed along with the reports for every odor complaint. The information is shared with the SJVAPCD and the City of Ripon.

*4.2.1.3 Odor Inspection Procedures – On-Site: **Daily Frequency***

Daily on-site inspections of plant operations are conducted according to the following protocol.

Facility Review: The Project Manager (PM) or designated qualified alternate staff conducts the following facility inspections at the frequency noted below. If any anomalous parameters are observed, they will be recorded on the on-site inspection record form or stored electronically. The PM or designated alternate inspects and takes actions as needed on the following:

- Process exhaust lines: The exhaust lines from the extrusion, drying and vertical cooling processes are all inspected for any leaks. If any odors are noted, further inspections are conducted to determine the source.
- Facility Walk-Through (M—F): Walk-around inspection of main production building doors (as listed on on-site inspection form) to ensure there are no open doors or potential odor escape sources and make general visual observations of the facility operations; ~~and~~

RTO Inspection: The PM or designated qualified alternate staff conducts the following inspections at the frequency noted below. If any anomalous parameters are observed, they will be recorded on the on-site inspection record form or stored electronically. The PM or designated qualified alternate staff inspects and takes actions as needed on the following:

- Control Room (**Daily**, in person or via mobile app): Overview of plant operations, observing the following:
 - Product being produced on each line and production rate (recorded in shift logs);
 - RTO average operating temperature (approximately 1,650°F² per DPF-Ripon setpoint): If RTO operating temperature is ~~significantly less~~ than 1,650°F (~~20°F or more~~), the following actions should be taken:
 - Evaluate gas usage data (ensure reasonable readings are being recorded);
 - Inspect rotary valve (ensure rotation); and
 - Check RTO inlet temperature, which should be approximately 145°F. If <100°F, confirm that fans are on or check dryer burner settings;
 - RTO Inlet and Outlet Temperatures: Target temperature difference between inlet and outlet temperature is 80 to 100°F. If the temperature difference is higher than 100°F, management will review options to correct, including initiating a MAMS³; and
 - RTO blower frequency (Hz): Normal is 42 Hz with a range of 40 to 45 Hz (three RTOs) or >50 Hz (two or fewer RTOs);
- RTO Operating Parameters (~~Recorded in DAHS, reviewed daily in person or via mobile application~~) are continuously monitored and recorded by the continuous emission rate monitoring system (CERM) which included a digital acquisition and handling system (DAHS). Reports from the DAHS are reviewed daily either in person or via mobile application. Sample DAHS reports, provided in Appendix E, assist DPF-Ripon in optimizing the RTO system operation. The following parameters provide a sample of the parameters monitored for the CERMS reports:
 - RTO Operating Status;
 - RTO Differential Optical Absorption System (DOAS) Calibration Status;

² The minimum RTO combustion chamber temperature is 1,650°F, as recommended to SJVAPCD in Project N-1491493 required in permits N-8234-4-12, '-5-12, and '-6-12.

³ During the RTO Manufacturer Automatic Maintenance Sequence (MAMS), the RTO Unit that is the subject of the MAMS is isolated from the rest of the RTO units (taken out of production), and the plant production emissions abated by the remaining RTOs. It should be reiterated that the plant will automatically shut down certain production units to reduce production exhaust ("called "load shedding") in the event that there is insufficient RTO capacity to abate the odors. This ensures the plant will never operate pet foods without the appropriate level of RTO System odor abatement capacity.

- RTO temperatures;
- ~~RTO pressure;~~
- ~~RTO fan speed (Hz) versus RTO inlet static pressure set point; and~~
- ~~Natural gas consumption.~~
- RTO fuel usage & heat input;
- RTO Exhaust Stack(s) Flow, Temperature and Moisture; and
- NOx Emissions.
- RTO POI (Conducted **daily**): The POI is conducted by a designated DPF-Ripon employee who conducted an unbiased olfactory review of the odors in real-time from each RTO exhaust. Based on the results of the POI, a decision will be made on whether one or more of the RTOs needs servicing by conducting a MAMS. In this test the odor coming directly from the abated RTO exhaust is sampled and tested and compared against the other exhausts to identify if any performance reduction trends are occurring.

Airflow Switches (**Weekly** Frequency): Check airflow switches behind the RTO control room for possible moisture buildup. Initiate moisture removal as applicable.

4.2.2 Staff Training Procedures

All inspection and training procedures will be maintained in the Qualtrax compliance software. The software will manage compliance schedules, personnel training, and document control.

4.2.2.1 Off-Site Odor Inspection Training

At a minimum, the FM, MS, QCM, and one designated alternate staff will be trained to conduct off-site odor inspections. Training will include consistent location identification and instructions for completion of the off-site inspection record form. Odor identification will be evaluated using the odor category checklist provided in Appendix BC. Off-site odor inspection training will occur once prior to staff member's initial inspection.

4.2.2.2 On-Site Odor Inspection

- Facility Inspection training for the PM and designated alternate staff will occur during normal onboarding training or when new personnel are designated to this role. Training will consist of instructions regarding the items that need to be observed and completion of the on-site inspection record form. Training will also be provided to the appropriate maintenance personnel in order to ensure that the inspections occur during off hours, such as over the weekend, or when the site PM is unable to be at the site.
- RTO Inspection training for the PM and designated alternate staff will occur during normal onboarding training or when new personnel are designated to this role. Training will consist of instructions regarding the correct RTO operating parameter ranges, potential resolutions for parameters out of range, chain of command if

corrective actions need to be taken, and completion of the on-site inspection record form.

- In-Stack RTO POI training for the PM, MS, QCM, and designated alternate staff will occur annually and prior to staff member's initial sampling. Training will consist of operation of the odor cup sampler, identification and categorization of odors, and completion of the odor checklist. Odor identification will be evaluated using the RTO odor terms and intensity scale on the checklist.

4.2.2.3 Maintenance Activities

Training for maintenance activities will continue to be conducted and tracked through the Qualtrax compliance software. The training will include a requirement to be cognizant of minimizing potential odor-causing activities.

4.2.2.4 Odor Complaint Response

Odor complaint response training for the FM, PM, QCM, SS, and designated alternate staff will be encompassed in the on-site odor inspection training. In addition, this training will focus on quick assessment of potential odors with the goal of determining application of corrective measures in a timely manner. (See description under Odor Complaint Tracking and Response below for additional details related to the odor complaint response system.)

4.2.2.5 SJVAPCD Orientation

It is recommended that new SJVAPCD inspectors tour the DPF-Ripon facility to familiarize themselves with the process and potential odor sources. SJVAPCD inspectors should contact the FM or the PM to arrange the orientation.

The SJVAPCD procedures for investigation of odor complaints is provided for reference purposes as Appendix F.

4.3 Maintenance Frequency: *Annual* (Per Manufacturer Recommendation)

The following annual Manufacturer-recommended maintenance is performed when the manufacturer visits the site and conducts both on-line and off-line inspections of the RTO systems:

- Perform annual visual inspection of entire RL-60 RTO system;
- Check diverter valve: stator/rotor surfaces;
- Inspect castable refractory;
- Check vertical valve movement
- Check all relays and contactors for wear
- Check burner mounting plate and tile assembly for cracks. Replace;
- Inspect/re-lubricate the thrust bearing carrier and housing
- Check all 460V terminal connectors/circuit breakers for tightness;
- Clean operating level block internals;
- Replace air cylinders with new cylinders and rebuild the removed cylinders;
- Exhaust fan coupling;

- Valve gear teeth lubrication/tooth wear;
- Inspect seal rings/spline housing;
- Burner throttle valve micro-ratio valve cam;

4.4 Engineering Controls

4.4.1 Description of Best Available Control Technology (BACT)

As noted in Section 3.0 of the Referenced Odor History Report for Pet Food Manufacturing Facility (dated May 2020), studies of odor emissions from pet food indicates that the chemicals contributing to the odors are organic compounds capable of being volatilized (i.e., emitted into the air). These odorous volatile organic compounds (VOC) are likely released during the cooking and drying stages of pet food production.

Air districts throughout California routinely require emission controls on sources of VOC emissions from a wide variety of processes. Within the context of the air permitting for new or modified sources of air emissions, the air agencies may require the installation of “Best Available Control Technology” (BACT) in order to satisfy New Source Review (NSR) requirements for new or modified sources of emissions. BACT determinations are periodically published so that the regulated community has visibility to the requirements.

Yorke reviewed the BACT determinations from four major air districts in California [San Joaquin Valley Air Pollution Control District (SJVAPCD), South Coast Air Quality Management District (SCAQMD), Bay Area Air Quality Management District (BAAQMD), and San Diego Air Pollution Control District (SDAPCD)]. The findings are shown in Table 2. ~~We also reviewed~~ Also, the California Air Resources Board (CARB), U.S. EPA, and Texas Commission on Environmental Quality (TCEQ) databases were reviewed; no additional BACT determinations were identified.

No BACT determinations specific to pet food manufacturing were identified.

To summarize, Yorke’s analysis indicates that the most applicable BACT for the pet food production process would be an afterburner with a minimum residence time of 0.3 seconds and a minimum combustion chamber temperature of 1,400°F. The DPF-Ripon facility operates the RTOs at 1,650°F with a minimum residence time that exceeds the recommended 0.3 seconds, hereby resulting in a level of performance that exceeds BACT.

4.4.2 Components of Engineering Controls

As noted previously, In in late 2019/2018, DPF-Ripon installed an RTO system consisting of three thermal oxidizer units, which operate in parallel to abate ~~all the~~ odors from the existing 3-production line exhaust (nine exhaust stacks combined into a common header). ~~In addition to~~ Although the RTO system is abating the current 3-line operation, the RTO System is also was designed to abate the odors from 4-production line operation ~~as well~~. This installation was completed and started up in December of 2018.

The exhaust from the production lines ~~are~~ is vented to a common ducting header that vents the process exhaust to the RTO system. Currently, based on 3-line production, the estimated residence time in the RTO combustion chamber is 2.33 seconds, which is over seven times the BACT-specified retention (residence) time of 0.3 seconds. With the installation of the fourth production line, the residence time in the combustion chamber

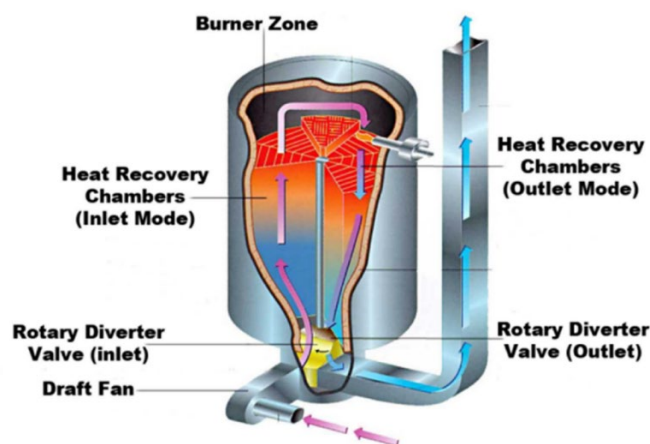
will be 1.75 seconds, which is more than five times the BACT-specified minimum residence time.

Additionally, although the BACT-recommended oxidation temperature ranges from 1,200°F to 1,400°F, DPF-Ripon operates the RTO units at a minimum temperature of 1,650°F. Additional details on the design and operating parameters are provided in the Odor History Report noted in the list of References.

The Durr RL-60 RTO System for DPF-Ripon is designed for efficient odor abatement and fuel use. Each RTO includes 12 separate ceramic heat-exchange beds arranged radially over a proprietary rotating diverter valve. After the exhaust gases from all production lines are thoroughly mixed in the RTO feed header, the incoming odorous air is introduced into the respective RTO through the bottom of the unit. The inlet air from the RTO feed header is drawn upwards through five of the 12 beds, which have been previously preheated. Heat is transferred into the odorous air as it passes through the preheated ceramic bed and is further heated to the temperature setpoint in the combustion chamber near the top of the RTO, where a natural gas-fired burner is operated to complete the oxidation process.

Hot, clean exhaust is drawn downward through five adjacent ceramic beds to transfer the thermal energy, preheating the media, before being exhausted to the atmosphere through a stack. The two “spare” ceramic beds serve to prevent cross-contamination between the inlet and outlet sections and to ensure the high destruction efficiency of the RTO. A schematic of the RTO Flow is shown in Figure 54-1, below:

Figure 4-1: Durr Regenerative Thermal Oxidizer (RTO) Flow Schematic



The rotary diverter valve slowly turns which allows ceramic beds that have been cooled by transferring heat to the incoming air to then be heated back up to become a preheating bed by the outgoing exhaust. Since the rotating valve is the only moving part, there is very little wear to the bearing surfaces, and the reliability/longevity of the beds and the rotating valve are extremely high.

To ensure ongoing reliability and appropriate operation, the temperature difference between the incoming air and the outgoing exhaust is monitored and expected to be between 80-100°F, which indicates that good heat transfer is occurring. In the event the temperature difference is above 100°F, staff conducts odor testing to verify that the RTO

is operating properly, then if the temperature difference remains high, will initiate a manufacturer automatic maintenance sequence (MAMS) which returns the ceramic bed to clean condition and full heat transfer and odor abatement capability.

If the temperature difference is less than 80°F, staff will conduct odor testing of the RTO exhaust to develop a baseline reading. If the exhaust from the RTO is determined to be more odorous than normal, the RTO is isolated from the system, visually inspected and possibly shutdown for internal inspections.

The three Durr model RL-60 RTOs operate in parallel, with the plant production exhaust entering the units from a common header. Each of the Durr model RL-60 RTOs is a unique single vessel that is designed to destroy more than 95% of the volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) potentially found in industrial process exhaust streams. With the installation of the RTO System, the plant/RTO process control logic requires the RTOs to be online with sufficient capacity to treat the exhaust from the plant, before allowing the production processes to be started up and operated to produce pet food.

The RTO air permit issued to DPF-Ripon by the SJVAPCD (Authority to Construct/ATC N-8234-4-10, '-5-10 and '-6-10) requires the RTOs to operate at a temperature sufficient to achieve 95% VOC abatement. Based on the SJVAPCD-approved initial source testing conducted ~~in January of 2019~~ on 1-23-2019, DPF-Ripon determined that RTO operation at a temperature of at least 1,500 degrees Fahrenheit (°F) ~~will~~ would easily ~~meet~~ achieve the required 95% VOC destruction efficiency.

However, DPF-Ripon learned, from the subsequent RTO compliance source testing conducted on 1-24-2019, that at an operating temperature of 1,650 F, in order to achieve 99% VOC abatement was achieved. Based on this higher degree of VOC (and hence odor) control, DPF-Ripon has voluntarily proposed 1,650 F as the minimum RTO combustion temperature. This minimum temperature is reflected in the final revised RTO ATC as issued on 12-29-2021 (N-8234-4-12, '-5-12 and '-6-12). higher level of VOC abatement, DPF-Ripon operates the units at a setpoint of 1,650°F, which is sufficient to abate over 99% of the VOCs as demonstrated in the January 2019 source tests.

Additionally, aAs required by the SJVAPCD Permit to Operate (PTO), annual required source testing is required to demonstrate ongoing continued compliance with the VOC emission limits and percent abatement requirements was conducted in 2020. Runs 2 and 3 of the tests showed that VOC levels in the RTO exhaust was below the level of detection, although the result from sample run 1 was high enough to negatively impact (reduce) the overall average VOC abatement to 90.16%. This sample run result was believed to be caused by the use of a contaminated sample probe, therefore DPF-Ripon retested the RTO on May 14, 2020 which showed a VOC abatement efficiency of 97.9 %, which showed compliance with the 95% minimum abatement efficiency.

~~As of this writing of the OMP, RTO source testing has been conducted in January of 2019 and again in January of 2020 (results pending).~~

Additionally, the RTOs were designed and constructed with a supplemental 8 feet of vertical combustion chamber volume, thereby providing additional air abatement residence time at the RTO internal temperature. This has the effect of both further oxidizing carbon

monoxide (CO) into carbon dioxide (CO₂) and increasing the abatement (oxidation) of the odorous air contaminants/VOCs.

Beyond the 2019 and 2020 compliance source testing, DPF-Ripon has adopted certain regular inspection practices (listed in this Odor Management Plan) which requires daily RTO and facility-wide (site) equipment and odor inspections to minimize odors. Part of these practices include a frequent review of the exhaust gas odors from each RTO, to determine which unit is in need of a MAMS. Based on this, the RTO deemed to be most in need of maintenance is given highest priority for the initiation of the maintenance sequence.

Odor Complaint Tracking: In addition to the in-plant and offsite inspection practices, DPF-Ripon also actively tracks, records, provides the SJVAPCD and City of Ripon with weather data to assist in the review of odor complaints filed with the SJVAPCD. A sample of the odor tracking records from late 2020 and early 2021 is included as Appendix G. Table 4-1 provides a summary of the confirmed vs unconfirmed odor complaints for the entire period of DPF-Ripon operation.

Table 4-1: DPF-Ripon Odor Complaint History vs RTO Installation

<u>Operating Periods</u>	<u>Confirmed Odor Complaints</u>	<u>Total Odor Complaints</u>
<u>2012-2018 (pre-RTO)</u>	<u>173</u>	<u>528</u>
<u>2019</u>	<u>2</u>	<u>18</u>
<u>2020</u>	<u>0</u>	<u>10</u>

4.4.3 Pet Food Production Lines/RTO Process Logic

The RTO System was designed to be an integral part of the entire facility operation. As such, the pet food production lines cannot be operated unless the RTO Units are operating at the temperature setpoint with sufficient flow capacity to abate the production line exhaust gases.

Therefore, control of the RTO is digitally integrated into the overall operation process logic ensuring that the RTOs operate as a unit, with the volumetric intake flow to each RTO controlled by a variable speed intake process air fan that maintains a pressure setpoint in the common ~~80-inch~~ 80-inch exhaust header.

If the process air flow from the plant is reduced due to one or more lines being shut down, then the three RTO intake blowers will ramp down to maintain the pressure setpoint in the header. In the event that the supply volume of gas from the plant decreases further, the RTO is designed to isolate one or more RTO unit(s) from the system to maintain the proper flow rates, pressures and abatement efficiency. The RTO system is designed to operate as needed to abate the odors from anywhere from one to four production lines, with design allowances for any combination in between.

This operation occurs due to the algorithms built into the process logic controllers (PLCs) of the RTO system and the production facility which review the overall RTO volumetric

abatement capacity in light of what is being requested for production at the plant. If the PLC determines that sufficient RTO capacity is available, the PLC will allow the additional production to occur. Only if the additional RTO capacity is operating or is available will the PLC allow the plant to increase production.

5.0 DPF COMPLAINT TRACKING AND RESPONSE

5.1 General Reporting: Facility Overview

The main principles underlying every odor complaint (whether confirmed or not) is 1) that SJVAPCD communicate with DPF-Ripon as soon as possible that an odor complaint has occurred, and 2) that every odor complaint, be investigated, remediated (if verified as pet-food) and reported according to an established criteria. ~~the odor complaint be communicated concurrently between the SJVAPCD, DPF-Ripon (Operator) and City of Ripon, and 2) every odor complaint, if verified as pet-food odor, be investigated, remediated, recorded and reported according to an established criteria.~~ The odor complainant should provide the agent taking the complaint with the date, time and general neighborhood (location) of the odor event.

Once notified that an odor complaint has been submitted to the SJVAPCD, ~~t~~The operator shall respond according to the Tier 1, 2, or 3 methodologies, depending on the specifics of the event.

The operator will submit to the City of Ripon a summary log of all odor complaints occurring during the most recent calendar month.

In addition to the measures described below, in response to odor and other nuisance impacts, the City shall retain all rights and remedies available under the Ripon Municipal Code, including, but not limited to, Chapters 1.10 and 1.12.

5.2 Tier 1 Odor Response

If an odor complaint is received ~~that is confirmed to have originated from the DPF facility (either confirmed or unconfirmed),~~ the Operator shall initiate a system check **within 2 hours of DPF's receipt of the complaint confirmation** to identify any potential cause of odor. ~~(Note that DPF-Diamond may also initiate systems checks on unconfirmed complaints, as determined by DPF-Diamond on a case-by-case basis.)~~

If an issue with normal operation is identified that could be the cause of potential odors, the necessary cleaning, mechanical adjustments, repairs, or other routine modifications shall be made to resolve the issue.

~~The Operator shall contact the City~~ shall provide a follow-up report to the SJVAPCD, as well as and the complainant (if requested by the complainant's permission) to provide of the findings of the systems check, including whether an odor issue was identified, and, if so, the steps taken to remedy the issue. These findings will also be entered into the complaint log and reported to the SJVAPCD. If no issue with the system is identified, this will also be logged and reported to the City and SJVAPCD.

The City will be notified by DPF-Ripon via email within one business day of receiving notice of the odor complaint event and the ultimate outcome.

- a. Tier 1 Specific Actions to be ~~taken by Operator~~ initiated by Operator within 2 hours of odor complaint notification, and to be completed by the close of the following business day:
 - Conduct on-site walk-through (checking doors/openings, etc.) noting any unexpected odors or other findings.
 - Review ~~of~~ RTO operating Parameters, including:
 1. RTO combustion zone temperature (compare temperature vs setpoint);
 2. Inlet temperature (from inlet header) & Outlet temperature difference. The temperature difference should be in the range of 80-100 F. If the temperature difference is outside of this range, the temperature differential will be reviewed with the DPF-Ripon Project Manager (PM), who will then take the appropriate actions, which may include Manufacturer Automated Maintenance Sequence (MAMS);
 3. Check wind speed and direction at the time of the odor complaint. ~~Determine if consistent with location of community odor event~~ Provide a copy of the DPF-Ripon weather report to the SJVAPCD to assist in determining if the weather was consistent with stated general location of the odor event. A sample weather report from an odor complaint filed on February 9, 2021, is provided in Appendix D; and
 4. Conduct RTO exhaust Personal Odor Inspection (POI) procedure (using DPF-Ripon odor inspection procedure OMP-1⁴ and equipment to sample/compare odors from RTO-1, RTO-2 and RTO-3 ~~odors~~).
 - Conduct MAMS on most odorous RTO exhaust then conduct ~~new~~ follow-up POI odor test of RTO exhaust after conducting MAMS.
- b. Record findings/steps taken in Odor Complaint Log File.
- c. Report findings/~~steps~~ measures taken to SJVAPCD ~~and City~~ via email by the close of the following business day after receipt of complaint confirmation. Report the event and findings to the City via the monthly Odor Complaint Report.

5.3 Tier 2 Odor Response

If, after an RTO systems check and any necessary remedies have been implemented according to the Tier 1 protocol, in the event that an additional (verified) odor complaint is received (or an unusual increase in unconfirmed complaints that have been reviewed and agreed upon by the City and DPF Ripon) within the same week from the same or new complainants that could suggest that an odor issue remains unresolved (as determined on a case-by-case basis by consultation between the ~~City~~ SJVAPCD and DPF), within 2 hours of DPF's receipt of the additional confirmed odor complaint (or determination by the City and DPF Ripon that an unusual increase in complaints,

⁴ OMP-1 Personal Odor Inspection (POI) procedure is provided in Appendix ~~E~~.

including unconfirmed complaints, has occurred) the Operator will ~~implement~~ initiate the following Tier 2 Odor Response actions.

- a. Tier 2 Specific Actions to be taken by Operator and concluded by close of following business day:
 - Conduct Level 1 Response Steps (if not already performed).
 - Conduct examination of all exhaust lines including fresh air dampers to ensure there is no leakage of untreated production exhaust.
 - ~~Conduct~~ Initiate MAMS on all RTO units (if necessary). The MAMS will be performed on one RTO at a time.
 - Perform post MAMS POI on all RTO units. Record results.
 - If any RTO has stronger odor than the others, operator to take appropriate measures to improve odor abatement, including increasing the RTO combustion temperature in 50°F increments (above the minimum 1,650°F minimum temperature setpoint), and retesting the odor using the POI procedure.
 - Review pre-MAMS and post-MAMS inlet and outlet exhaust temperatures.
 - As soon as practical, contact the RTO manufacturer (Durr Systems) to review any anomalous findings/further recommendations for cleaning/adjusting RTO System via conference call.
- b. Record findings/steps taken in Odor Complaint Log File.
- c. Report findings/steps taken to SJVAPCD ~~and City~~ via email within 1 business day. Report the event and findings to the City via the monthly Odor Complaint Report. A sample monthly Odor Complaint Report submitted to the City of Ripon is provided in Appendix H.

5.4 Tier 3 Odor Response

If, after implementing all measures above, additional verified odor complaints are received from the same or new complainants ~~that~~ which suggest the same odor issue remains unresolved, the operator shall coordinate with the City and SJVAPCD (as applicable) to determine appropriate additional measures. Discussions with the appropriate parties will be initiated as soon as practicable⁵, with DPF providing progress updates to the City and/or SJVAPCD. Such measures include, but are not limited to, a full diagnostic of the RTO by the manufacturer (and/or other qualified equipment diagnostician), ~~or~~ upgrades or expansions of the odor abatement system, and/or implementation of additional measures identified in the March 19, 2021 OSE report or other more current recommendations from an odor expert.

Until such time as the odor is appropriately abated to the performance levels that were demonstrated by the RTO system during the period from January 2019 through ~~March~~ December 2020, the City and ~~Diamond Pet Foods~~ DPF will meet and confer and the City will determine, depending on the severity of the odor issue, if a decrease in the actual throughput of the DPF facility by (up to) the equivalent of the capacity of one production line would be helpful in reducing

⁵ City of Ripon and or SJVAPCD may not be available over the weekend or on holidays.

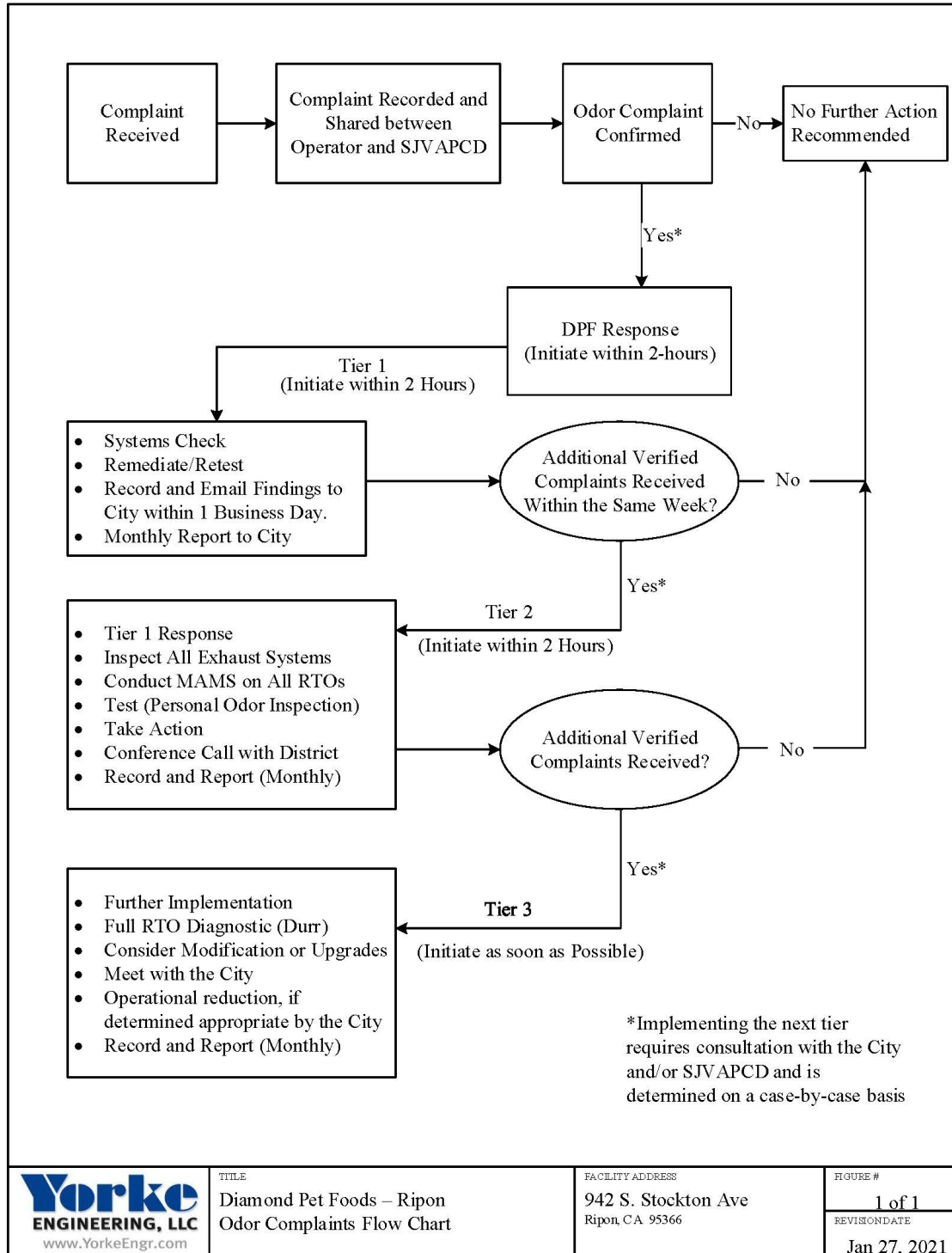
odors. The following Tier 3 Response actions will be initiated, as apropos, in the event that both Tier 1 and 2 Response actions have been completed and there are still additional confirmed odor complaints:

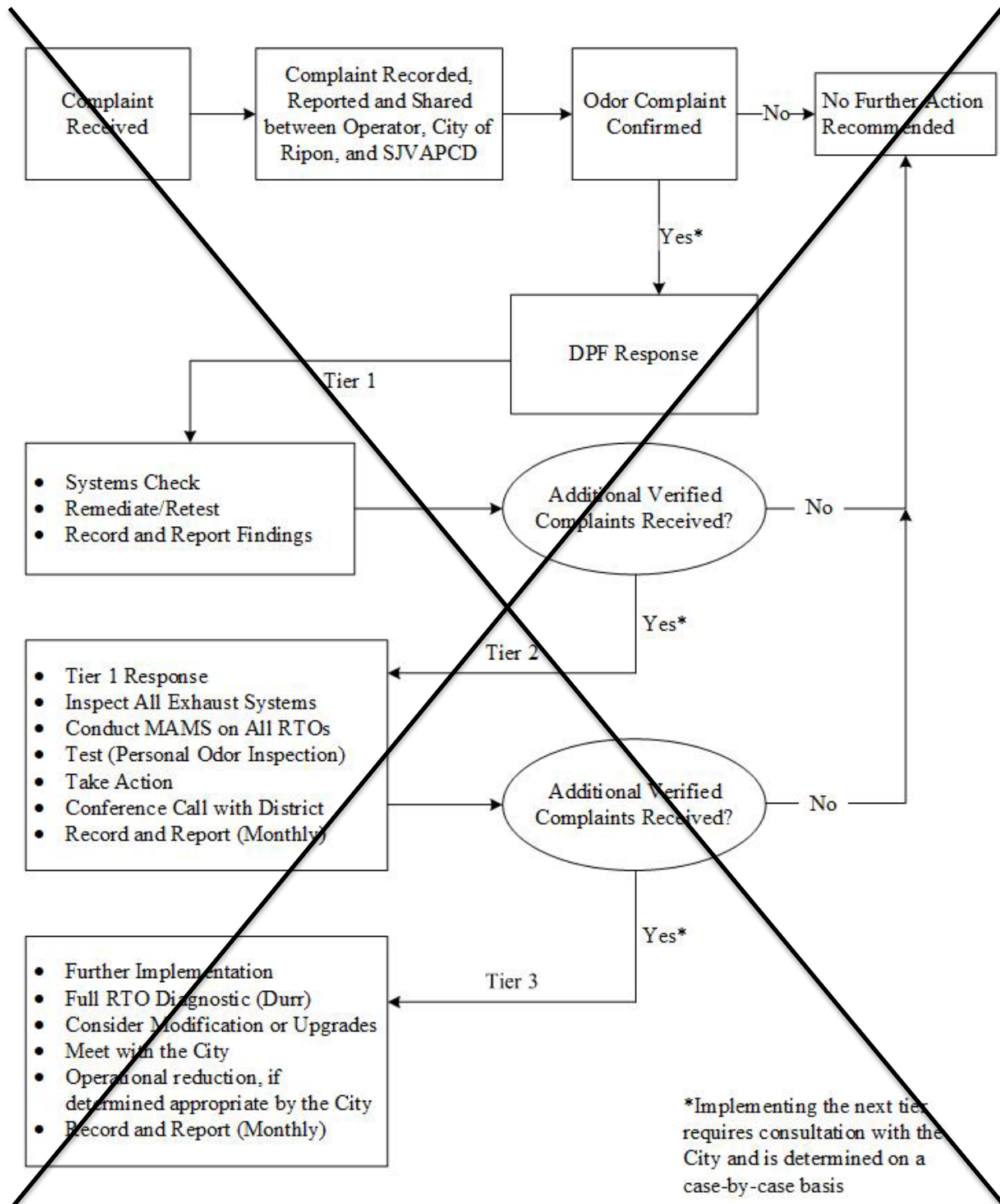
- a. Tier 3 Specific Actions to be taken by the Operator within 30 days of determination that Tier 3 Odor Response is necessary:
 - Operator to meet & and confer with RTO manufacturer (Durr Systems) to determine if on-site inspection is needed, or if additional cleaning measures or physical modifications to the current technology are available/necessary.
 - Operator to review the maintenance history of the RTO System to identify if one or more RTO units (including visual and/or smoke test of ceramic heat transfer media) needs to be serviced. Components to be evaluated include:
 1. RTO ceramic (inspect for integrity, possible contamination or blockages, etc.);
 2. RTO rotating valve sealing performance;
 3. RTO metal thermal cycles/metal structure;
 4. RTO burner turbulence/mixing/thermal uniformity;
 5. RTO inlet blower variable frequency drives. Compare VFD/blower performance/flow uniformity on all RTO Units; and
 6. Conduct design review.
 - Review RTO setpoints to ensure that appropriate capacity according to best design practices exists.
 - Review facility blower & product movement through plant with DPF Corporate design group to identify feasibility of revised blower exhaust rates.
 - Determine which kinetic parameter (RTO temperature, residence time, mixing efficiency) needs to be improved/increased.
 - Review process control logic to determine if improved RTO odor abatement could be accomplished by software modifications.
 - Prepare timeline to implement necessary design/hardware changes.
 - Reduce production: Depending on the severity of the additional and ongoing confirmed odor complaints, the operator will meet with the City Code Compliance Division (CCD) and the City will determine if decreasing production will be beneficial. This could include a temporary reduction in production up to a maximum equivalent of 25% of the actual four-line production capacity.
- b. Record findings/steps taken in Odor Complaint Log File.
- c. Report findings/steps taken to SJVAPCD and City via written report.

5.5 DPF Compliance Tracking Flowchart and Contacts

The following flowchart and associated contact table provides a graphical approach to the Tiered responses detailed in §5.1-5.4.

Figure 5-1: Progressive Tier Response Flowchart





5.6 Methods for Filing Odor Complaints

Members of the community who encounter pet food odors are encouraged to file complaints with SJVAPCD using one of the following methods.

- File a Complaint Online with SJVAPCD, by entering the following web address:

<http://www.valleyair.org/busind/comply/complaint.htm>,

Click on: **SUBMIT AIR POLLUTION COMPLAINT**

or

- File a Complaint by Phone with SJVAPCD: (800) 281-7003

It is recommended that complaints be filed with the SJVAPCD; however, complaints can also be filed with the City of Ripon (Planning Department: 209-599-2108) and/or with DPF-Ripon via the following numbers: DPF Project Manager (Joe Garcia) at 209-765-4741 or Shift Supervisor at 209-602-9379.

Note that the City-SJVAPCD will inform DPF-Ripon when an odor complaint is received, but ~~and DPF-Ripon will notify one another when any complaint is received.~~ SJVAPCD does not disclose the details of ongoing complaint investigations to third-parties. DPF-Ripon will email the City of Ripon within one business day of receipt of a confirmed odor complaint and will also prepare/submit to the City a monthly report for the previous month any odor complaint(s) received.

6.0 OMP PREPARERS AND AGENCY CONTACTS

This document was prepared under the direction of the City of Ripon by Yorke Engineering, LLC, in coordination with Ascent Environmental, Inc, and in consultation with Diamond Pet Foods-Ripon. Following is a detailed list of those who participated in the preparation and review of the document.

6.1 OMP Preparers

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6.2 OMP Reviewing Agency (CEQA Lead Agency)

City of Ripon

Ken Zuidervaart

Director of Planning & Economic Development

6.3 OMP Review Frequency

The OMP is reviewed on a regular basis, at a frequency not to exceed every five (5) calendar years. A form used as a template for conducting this review is included as Appendix I.

7.0 REFERENCES

Ontario. 2017. Example Odour Control Report for a Pet Food Manufacturing Facility that Cooks and Dries Animal Products. May 2017.

San Joaquin Valley Air Pollution Control District (SJVAPCD), 2007. Complaint Response Guidelines. COM 1140, February 8, 2007.

Yorke Engineering, 2013. *draft* Odor Abatement Study for Diamond Pet Food of Ripon. March 2013.

Yorke Engineering, 2020. Odor History Report for Pet Food Manufacturing Facility; 5-19-2020.

APPENDIX A – RIPON AREA CITIZEN ODOR REPORTING OPTIONS

The following three options are provided for persons who wish to file an odor complaint in the town or Ripon.

1) San Joaquin Valley Air Pollution Control District (SJVAPCD)

Members of the community who encounter pet food odors are encouraged to file complaints with SJVAPCD using one of the following methods.

- File a Complaint Online with SJVAPCD:
<http://www.valleyair.org/busind/comply/complaint.htm>.

Once on the page, click on: **SUBMIT AIR POLLUTION COMPLAINT**

- File a Complaint by Phone with SJVAPCD: (800) 281-7003

It is recommended that complaints be filed with the SJVAPCD; however, complaints can also be filed with the City of Ripon and/or DPF-Ripon as follows:

2) City of Ripon

Members of the community may also contact the City of Ripon at:

- Planning Department: (209) 599-2108

3) Diamond Pet Foods – Ripon (DPF-Ripon)

Members of the community should also feel free to file an odor complaint directly with DPF-Ripon, who will respond with an investigation into the cause of the odor and the remedy.

- DPF Project Manager (Joe Garcia): (209) 765-4741, or
- Shift Supervisor: (209) 602-9379.

**APPENDIX B – ~~ODOR INSPECTION FORMS~~ RTO PERSONAL ODOR
INSPECTION (POI) PROCEDURE**

Odor Comparison Test Procedure **OMP-1**

RTO EXHAUST

PERSONAL ODOR INSPECTION (POI)

REF: Permit Units N-8234-4-10, N-8234-5-10, N-8234-6-10

1. APPLICABILITY

- 1.1. This method is used to determine the maintenance priority for the Diamond Pet Foods-Ripon (DPF-Ripon) regenerative thermal oxidizers (RTOs).

2. PRINCIPLE

- 2.1. A sample of exhaust is continuously extracted from the RTO exhaust line, cooled and sampled by a trained DPF-Ripon Sample Technician (DRST). The RTO that is determined to have the strongest odor will be assessed to determine if the Manufacturer Automatic Maintenance Sequence (MAMS) is needed.

3. RANGE AND SENSITIVITY

- 3.1. The minimum and maximum measurable concentrations of odorous sample depends on the specific detection level of the DRST.
- 3.2. If any DRST is unable to establish a baseline of detection, an alternate trained DRST technician is chosen to conduct the review.

4. INTERFERENCES

- 4.1. In the event the DRST is unable to smell either via cold or allergies, an alternate trained DRST is chosen.
- 4.2. DRST should not be exposed to any highly odorous area such as the interior of the anhydrous ammonia SCR (boiler) injection ports or the anhydrous ammonia storage tank within 30 minutes of RTO exhaust sampling.

5. APPARATUS

- 5.1. PPE: Hard Hat, Safety Glasses, Leather or Thermal-Protective Gloves.
- 5.2. Sample Shunt Tubing Wand (see ½" curved stainless steel tubing).
- 5.3. Sample Collection/Testing Detection Housing (see Figure OMP-1B).
- 5.4. Sample conditioning (cooling/sampling): The assembly of this system is shown in Figure OMP-1B. The sample conditioning and capture system (wand) consists of approximately 3 feet of ½" diameter stainless steel tubing, curved for sample capture, with a funnel-shaped detection housing where the cooled sample exhaust may be analyzed by the DRST. Except as specified, all materials which come in contact with either the sampled exhaust or the heated exhaust housing (exhaust duct) must be constructed of stainless steel.
- 5.5. Sample Detection Requirements: Two DPF-Ripon Sample Technicians (two DRSTs). **NOTE: RTO odor testing according to OMP-1 should not be performed during MAMS or when the exhaust duct temperature exceeds 230°F.**

Figure OMP-1A
RTO Odor Sample Port Location

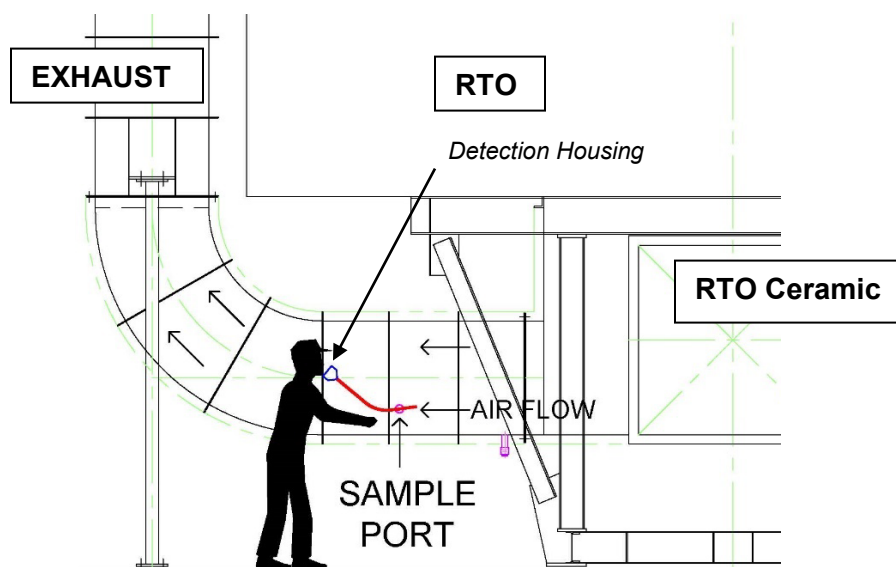


RTO Exhaust Odor Sampling Port

RTO Exhaust Odor Sampling Port
Close-Up View



Figure OMP-1B
RTO Odor Sample Image



6. PRE-TEST PROCEDURES

- 6.1. Review RTO operation: RTO odor sampling may be performed only when the RTO is operating during steady state operating conditions. The RTO exhaust temperature will be variable and will range from 210°F to 230°F. **NOTE: RTO odor testing according to OMP-1 should not be performed during MAMS or when the exhaust duct temperature exceeds 230°F.**
- 6.2. Insert the odor sampling wand as shown in Figure OMP-1B, with the curved sample wand directed upstream to capture sample using the flow momentum.
- 6.3. Ensure a suitable exhaust stream is established in the Detection Housing for the analysis.
- 6.4. Confirm the RTO is operating at steady state operation and that the exhaust temperature does not exceed 230°F.

7. SAMPLING

- 7.1. The DRST should conduct the odor analysis the exhaust stream by slowly drawing closer to the sample detection housing until a slight breeze from the cooled sample is felt coming from the wide end of the detection housing.
- 7.2. Gently draw the sample through the nose for approximately 15 seconds.
- 7.3. Clear the nose by breathing fresh air away from the exhaust for approximately 30 seconds and perform sampling per 7.2 again. Repeat this process until 4 tests are completed. Record a description of the odor detected.
- 7.4. Conduct this process on all three RTOs and compare the results.
- 7.5. Results should be discussed to determine if any maintenance is needed on any RTO and if so, the order of RTO maintenance.

8. REPORTING

The results from the testing should be recorded on the enclosed sample and analysis sheet (Figure OMP-1C).

Figure OMP-1C

Test Date: _____ [blank]: _____	DIAMOND PET FOODS – RIPON ODOR MANAGEMENT PLAN Summary of Odor Test Results	Test Times: RTO-1: _____ RTO-2: _____ RTO-3: _____
Source Information/Weather Conditions/Etc.		DRST Representatives
Weather Conditions (°F, Wind, etc.) _____	DPF-Ripon Sample Technicians DRST-1: _____ DRST-2: _____	
RTO-1 Product: _____	RTO-2 Product: _____	RTO-3 Product: _____
Applicable Regulations: _____		

Source Test Results and Comments

RTO 1				
Scent	None	Weak	Average	Strong
Overall Odor Intensity				
Pet Food				
Burnt Oven				
Natural Gas				
Other: _____				

RTO 2				
Scent	None	Weak	Average	Strong
Overall Odor Intensity				
Pet Food				
Burnt Oven				
Natural Gas				
Other: _____				

RTO 3				
Scent	None	Weak	Average	Strong
Overall Odor Intensity				
Pet Food				
Burnt Oven				
Natural Gas				
Other: _____				

Comments:

DPF-Ripon Team Leader	Reviewed by	Date	Approved By	Date
_____	_____	_____	_____	_____

**APPENDIX C – ~~RTO ODOR SAMPLING/TESTING PROCEDURE~~ ODOR
INSPECTION FORMS**

ON-SITE ODOR INSPECTION RECORD

Diamond Pet Foods of Ripon (DPF-Ripon)

DAILY

Inspection Date: Inspection Type (check box) : ☐ daily ☐ complaint
 Inspection Time: ☐ recheck ☐ other

Inspection Conducted By:
 Inspection Assisted By (if applicable)

COMPLAINT INFORMATION (IF APPLICABLE)

Complaint Date:

Complaint Time:

Approximate Location:

SJVAPCD Inspector Contact:

Complaint Status: (circle one)

Confirmed / Not Confirmed

METEOROLOGICAL DATA

Weekly Basis: (Every Monday) DPF-Ripon downloads and transmits weather data to Yorke Engineering

Wind Direction (from):

Wind Speed:

PRODUCTION RECORDS		
	OPERATING	PRODUCT
Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>

RTO/SOUTH AREA INSPECTIONS								
	MODE*	FAN HZ	INLET TEMP	OUTLET TEMP	COMB TEMP	GAS SCFH	EXHAUST STACK ODOR INSPECTION (comment)	COMMENTS
RTO-1								
RTO-2								
RTO-3								
FAT TKS	COMMENTS:							

*MODE 0: Burner Off (shutdown)

*MODE 2: Warming Up

*MODE 1: Steady State

*MODE 3: Set Back

*MODE 4: Warming Up

*MODE 5: Bakeout (MAMS)

PRODUCTION BUILDING DOORS		"AS-FOUND" CONDITION		COMMENTS/ACTIONS TAKEN
Rooftop (Personnel)	<input type="text"/>	<input type="text"/>	open	<input type="text"/>
UPS-Roll-up	<input type="text"/>	<input type="text"/>	open	<input type="text"/>
UPS Personnel (west wall)	<input type="text"/>	<input type="text"/>	open	<input type="text"/>
South Wall-1, far west (personnel)	<input type="text"/>	<input type="text"/>	open	<input type="text"/>
South Wall-2, west of fat tanks (personnel)	<input type="text"/>	<input type="text"/>	open	<input type="text"/>
South Wall-3, nr fat tanks (personnel)	<input type="text"/>	<input type="text"/>	open	<input type="text"/>
South Wall-4, near controll rm (personnel)	<input type="text"/>	<input type="text"/>	open	<input type="text"/>
South Wall Roll Up (nr control rm)	<input type="text"/>	<input type="text"/>	open	<input type="text"/>
South Wall-Refrig Meat Roll Up	<input type="text"/>	<input type="text"/>	open	<input type="text"/>
South Wall-Refrig Meat (personnel)	<input type="text"/>	<input type="text"/>	open	<input type="text"/>
East Wall Roll-Ups (Hammer Mill)	<input type="text"/>	<input type="text"/>	open	<input type="text"/>
Rooftop Personnel (above extruders)	<input type="text"/>	<input type="text"/>	open	<input type="text"/>

GENERAL INSPECTION AREAS		COMMENTS
Rooftop-Extruder Area	<input type="text"/>	<input type="text"/>
South Area: Near Fat Tanks	<input type="text"/>	<input type="text"/>
South Area: Near RTOs	<input type="text"/>	<input type="text"/>
South Area: Dumpsters ¹	<input type="text"/>	<input type="text"/>
East Area Roadway (west of Cogen)	<input type="text"/>	<input type="text"/>

¹If odors are detected, contact the DPF-Ripon Sanitation Lead to arrange for pickup of the waste container

RECOMMENDATIONS

RTO ODOR INSPECTION RECORD

Diamond Pet Foods of Ripon (DPF-Ripon)

DAILY

Inspection Date	Inspection Time	Inspection Conducted By

RTO 1				
Scent	Present	Weak	Average	Strong
Overall odor intensity				
Pet food				
Burnt Oven				
Natural Gas				
Other - describe				

RTO 2				
Scent	None	Weak	Average	Strong
Overall odor intensity				
Pet food				
Burnt Oven				
Natural Gas				
Other - describe				

RTO 3				
Scent	None	Weak	Average	Strong
Overall odor intensity				
Pet food				
Burnt Oven				
Natural Gas				
Other - describe				

Note: Rate all terms.

GENERAL COMMENTS, IF APPLICABLE	
(Maintenance Plans/Activities/Planned Shutdowns/Equipment Replacements, etc)	

OFF-SITE ODOR INSPECTION RECORD

Diamond Pet Foods of Ripon (DPF-Ripon)

DAILY

Inspection Date	Inspection Time	Inspection Conducted By

Location (Circle One)
Highway 99 / Main St. Exit and Overpass / Hammett Rd / Salida / Jack Tone Rd / Laurelwood/ Other

Offsite Odor Category Checklist

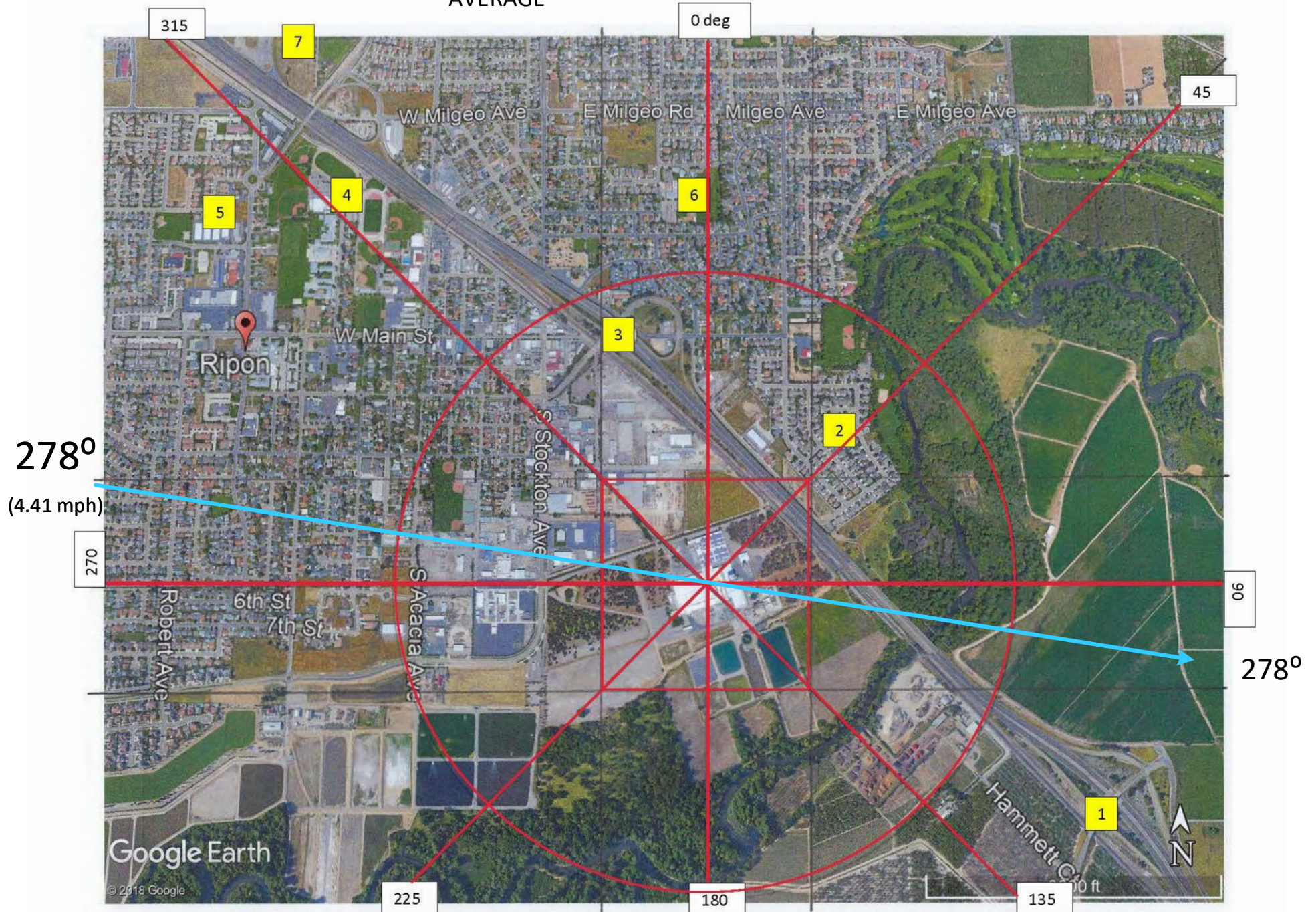
Scent	Present	Not-Present	Notes
Pet food			
Vehicle exhaust			
Gasoline			
Cigarette			
Fishy			
Meaty			
Potato			
Rancid			
Camp fire			
Musty, mildew			
Compost, organic decay			
Nutty			
Silage (grass, animal feed)			
Livestock			
Citrus			
Petrichor (smell after rain)			
Garbage			
Floral			
Other - describe			

Note: Rate all terms.

APPENDIX D – SAMPLE ODOR COMPLAINT WEATHER REPORT

3/8/2021 0800 – 0900 hrs

AVERAGE



Date	Wind Speed (MPH)	Wind Dir (from) (Deg, from)	Gust (MPH)	Sigma (Deg)
3/8/21 8:00	7.2	259	9	12
3/8/21 8:01	5.9	267	7.8	10
3/8/21 8:02	7.1	269	9	11
3/8/21 8:03	5.3	263	7.2	10
3/8/21 8:04	4.8	278	8.4	17
3/8/21 8:05	5.7	272	8.4	20
3/8/21 8:06	6.1	269	8.4	10
3/8/21 8:07	6.3	259	7.8	12
3/8/21 8:08	4.1	266	4.8	15
3/8/21 8:09	4.4	268	6	13
3/8/21 8:10	4.9	276	7.2	20
3/8/21 8:11	5.1	289	7.2	14
3/8/21 8:12	7.7	301	11.4	11
3/8/21 8:13	7.4	302	9	9
3/8/21 8:14	4	272	6.6	20
3/8/21 8:15	2.4	270	3.6	49
3/8/21 8:16	1.9	223	3	36
3/8/21 8:17	2.8	269	3.6	18
3/8/21 8:18	2.6	266	4.2	13
3/8/21 8:19	2.4	179	3.6	27
3/8/21 8:20	2.8	260	4.2	48
3/8/21 8:21	1.7	282	2.4	45
3/8/21 8:22	2.4	271	3.6	39
3/8/21 8:23	2.5	291	4.8	32
3/8/21 8:24	2.9	267	4.2	40
3/8/21 8:25	3.7	303	5.4	20
3/8/21 8:26	2.7	308	4.2	36
3/8/21 8:27	2.7	200	3.6	37
3/8/21 8:28	1.7	314	2.4	61
3/8/21 8:29	1.5	1	2.4	65
3/8/21 8:30	4.3	337	6	15
3/8/21 8:31	4	298	5.4	13
3/8/21 8:32	4.2	305	6.6	17
3/8/21 8:33	7.4	335	9	8
3/8/21 8:34	6.6	347	8.4	19
3/8/21 8:35	4.9	291	9	45

Avg. Wind Speed (MPH)	Median Wind Speed (MPH)	Avg. Wind Dir (Deg, from)	Median Wind Dir (Deg, from)	Avg σ_0 (Deg)	Med. σ_0 (Deg)
4.41	4.1	277.77	281	23.02	16
Max. Wind Speed (MPH)		Most E Wind Dir (Deg, from)			
11.4					
Min. Wind Speed (MPH)		Most W Dir (Deg, from)			
1					

3/8/21 8:36	5.8	330	7.8	11
3/8/21 8:37	2.4	304	4.2	51
3/8/21 8:38	3.2	315	5.4	36
3/8/21 8:39	6.7	310	9	15
3/8/21 8:40	7.7	297	9	13
3/8/21 8:41	4	328	6	24
3/8/21 8:42	6.9	328	8.4	14
3/8/21 8:43	8	311	9	14
3/8/21 8:44	6.2	307	8.4	8
3/8/21 8:45	6.7	312	8.4	5
3/8/21 8:46	6.4	302	8.4	28
3/8/21 8:47	6.3	281	8.4	8
3/8/21 8:48	5.2	297	6	12
3/8/21 8:49	5.6	301	6.6	11
3/8/21 8:50	5.2	293	6.6	7
3/8/21 8:51	3.2	260	3.6	16
3/8/21 8:52	3.1	262	4.2	25
3/8/21 8:53	3.4	248	4.2	38
3/8/21 8:54	3	255	4.2	11
3/8/21 8:55	2.8	265	3.6	18
3/8/21 8:56	2.5	301	5.4	53
3/8/21 8:57	2.3	292	3.6	76
3/8/21 8:58	4.1	241	4.8	11
3/8/21 8:59	3	244	4.2	6
3/8/21 9:00	1	233	1.2	6

APPENDIX E – SAMPLE RTO DAHS MONITORING REPORTS



DIAMOND PET FOODS-RIPON
Continuous Emissions Monitoring Report

Date of Request: [Date of request]

Operation Date: [Operating date]

During Odor Abatement Operation

Maximum RTO Chamber Temp, F

Average RTO Chamber Temp, F

Minimum RTO Chamber Temp, F

[Permit Limit: 1650 F Minimum]

RTO Stack Flowrate, SCFM-Average

RTO Stack Temperature, F, maximum

RTO Stack Temperature, F, minimum

RTO Stack Temperature, F, average

All RTO Operations

Daily Total RTO Heat Input, MMBtu/hr

[Pemit Limit: 184.8 MMBtu/day Maximum-RTO]

Rolling 12-month Heat Input, MMBtu/yr

[Pemit Limit: 67,082 MMBtu/yr Maximum-RTO]

Rolling Combined 12-month Heat Input, MMBtu/yr

[Pemit Limit: 156,816 MMBtu/yr Maximum Total]

Maximum Total Hourly NOx Emissions, Lb/hr

[Permit Limit: 8.343 lb/hr]

Daily Total NOx Emissions, Lb/day

[Permit Limit: 200.4 lb/day]

Rolling 12-month NOx Emissions, Lb/yr

[Permit Limitz; 33,639 lb/yr]

Maximum RTO NOx Concentration

Time

Minimum RTO NOx Concentration

Time

Average RTO NOx Concentration

RTO-1 RTO-2 RTO-3

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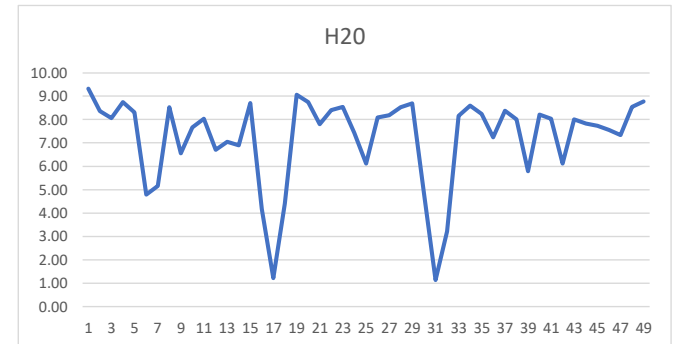
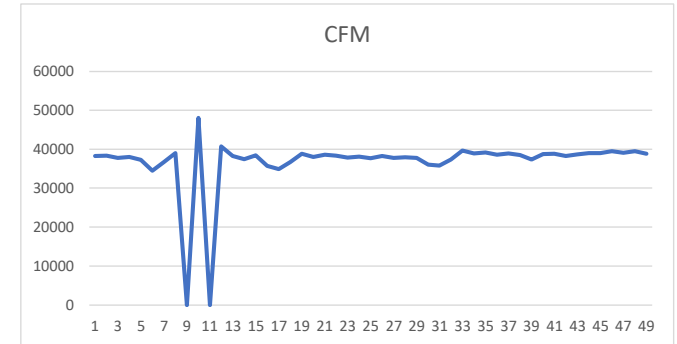
DRAFT REPORT; FORMAT MAY BE AMENDED

Average Values Report
Generated: 2/11/2021 07:08

Company: Diamond Pet Food
Plant:
City/St: Ripon, CA
Source: RT01

Period Start: 2/9/2021 00:00
Period End: 2/11/2021 00:00
Validation Type: 1/60 min
Averaging Period: 1 hr
Type: Block Avg

Period Start:	Average 1_NOxD ppm	Average 1_NOxMassD #/hr	Average 1_RTO_CTemp degF	Average 1_ProcOn 1=ON	Total 1NOxMass24 #/day	Average 1_FlowD scfmd	Average 1_H2O %
02/09/2021 00:00	2.79	0.78	1715	1	4.9	38267	9.32
02/09/2021 01:00	2.49	0.69	1715	1	4.9	38345	8.36
02/09/2021 02:00	2.25	0.62	1715	1	4.9	37760	8.06
02/09/2021 03:00	2.34	0.65	1715	1	4.9	38045	8.75
02/09/2021 04:00	2.30	0.62	1716	1	4.9	37273	8.31
02/09/2021 05:00	1.03	0.26	1715	1	4.9	34474	4.79
02/09/2021 06:00	1.54	0.41	1715	1	4.9	36698	5.16
02/09/2021 07:00	2.32	0.66	1715	1	4.9	38994	8.52
02/09/2021 08:00	1.60	N/A	1713	1	4.9	N/A	6.55
02/09/2021 09:00	1.96	0.57	1715	1	4.9	48053	7.67
02/09/2021 10:00	2.24	N/A	1715	1	4.9	N/A	8.03
02/09/2021 11:00	1.59	0.46	1717	1	4.9	40737	6.71
02/09/2021 12:00	2.32	0.65	1715	1	4.9	38225	7.05
02/09/2021 13:00	2.64	0.72	1715	1	4.9	37424	6.90
02/09/2021 14:00	3.06	0.85	1715	1	4.9	38386	8.70
02/09/2021 15:00	1.65	0.43	1715	1	4.9	35740	4.17
02/09/2021 16:00	0.74	0.19	1715	1	4.9	34924	1.22
02/09/2021 17:00	1.66	0.45	1715	1	4.9	36728	4.40
02/09/2021 18:00	3.21	0.91	1715	1	4.9	38825	9.06
02/09/2021 19:00	3.04	0.84	1715	1	4.9	38002	8.75
02/09/2021 20:00	2.60	0.73	1715	1	4.9	38594	7.80
02/09/2021 21:00	2.62	0.73	1715	1	4.9	38323	8.40
02/09/2021 22:00	2.57	0.71	1715	1	4.9	37833	8.54
02/09/2021 23:00	2.46	0.68	1715	1	4.9	38101	7.43
02/10/2021 00:00	1.75	0.48	1715	1	12.3	37663	6.12
02/10/2021 01:00	1.95	0.54	1715	1	12.3	38237	8.09
02/10/2021 02:00	1.75	0.48	1715	1	12.3	37798	8.18
02/10/2021 03:00	1.86	0.51	1715	1	12.3	37928	8.53
02/10/2021 04:00	2.15	0.59	1715	1	12.3	37789	8.69
02/10/2021 05:00	1.34	0.35	1715	1	12.3	36010	4.93
02/10/2021 06:00	0.59	0.15	1715	1	12.3	35808	1.14
02/10/2021 07:00	0.84	0.23	1715	1	12.3	37360	3.22
02/10/2021 08:00	1.82	0.53	1715	1	12.3	39682	8.16
02/10/2021 09:00	1.67	0.47	1715	1	12.3	38911	8.60



APPENDIX F – SJVAPCD GUIDELINE: INVESTIGATION OF COMPLAINTS

**SAN JOAQUIN VALLEY UNIFIED
AIR POLLUTION CONTROL DISTRICT
COMPLIANCE DEPARTMENT**

COM 1140

APPROVED: _____ **SIGNED** _____ **Date:** February 8, 2007
Jon Adams
Director of Compliance

TITLE: **COMPLAINT RESPONSE GUIDELINES**

SUBJECT: **INVESTIGATION OF COMPLAINTS**

OBJECTIVE:

The purpose of this policy is to establish uniform criteria for the investigation and documentation of complaints and public nuisances.

PURPOSE:

Rule 4102 (Nuisance) of the Rules and Regulations of the San Joaquin Valley APCD and California Health and Safety Code Section 41700 provides for the protection of the public from nuisances caused by air contaminants. It is the purpose of this policy to ensure (1) complaints are investigated in a prompt and professional manner; (2) ensure that staff properly documents their observations; and (3) ensure that any necessary corrective actions are implemented expeditiously. The district will investigate complaints and enforce Rule 4102 in accordance with these procedures and policies. The rule provides for the mitigation of public nuisances resulting from the emission of air contaminants.

POLICY STATEMENT:

I. COMPLAINT ASSIGNMENT

A. COMPLAINTS RECEIVED DURING NORMAL OFFICE HOURS

1. The clerical staff normally receives complaints. Personnel receiving the complaint initiate a complaint form.
2. The complaint is entered into the computer database and assigned to the Area Inspector. Supervising inspector or clerical staff shall phone/page/text message the inspector for assignment.
3. Complaints will be assigned as soon as possible. If no inspector can be reached

within 20 minutes the supervisor or manager should be contacted.

B. COMPLAINTS RECEIVED AFTER NORMAL OFFICE HOURS

1. The District telephone system records complaints that are received after normal office hours and pages the group page number when a complaint is recorded.
2. The on-call inspector is to call in and listen to the recorded message when paged and immediately call the complainant to personally interview them concerning the nature of the complaint.
3. The on-call inspector shall enter all complaints that he/she receives into the complaint database. At that time the voice mail messages may be erased or forwarded to the assigned inspector. If the on-call inspector is unable to enter all the complaints in the database while on-call, clerical staff may be asked to enter the complaints into the database on the next working day.
4. Complaints regarding a violation in progress should receive immediate response. Minor violations that can be easily verified at a later date may be investigated the next working day, if necessary.
5. Requests for assistance by a fire agency should receive immediate response unless fire agency personnel are able to document a violation without our assistance.
6. Complaints identified by a supervisor as an on-going problem that requires special treatment should receive immediate response.
7. Odor or other potential nuisance type complaints should be investigated as soon as possible when more than one complaint is received or if after talking to the complainant there is a possibility that there might be a public health threat then the inspector should respond as soon as possible.
8. Always call the complainant as soon as possible after receiving a page.
9. For complaints that will require a response after dark, no field response will be initiated unless it is believed that a public health or safety hazard is in progress and supervisor or manager approval has been given.
10. Inspector safety should always be considered. If you encounter unsafe conditions, exit quickly and report the situation to your supervisor. In some cases it may be necessary to request the assistance of law enforcement.
11. When it is questionable if a complaint requires immediate response, contact a supervisor or manager for assistance.

12. Complaints received by the on-call staff that require prompt investigation, but are not immediately investigated due to nightfall or other extenuating circumstances, shall be investigated by the end of the next day. Complaints that are not investigated before the next working day shall be assigned to the appropriate supervisor for reassignment to another inspector. The supervisor shall be notified by voicemail of the pending complaint assignment.
13. Any time the inspector spends answering pages, listening to voicemail complaint messages, talking to complainants, or entering information into the database should be reported as hours worked.
14. All time the inspector spends driving to the field, investigating the complaint, and returning home should be reported as callback.

C. COMPLAINTS RECEIVED BY THE INSPECTOR

When a complaint is received by an inspector in the field, the inspector shall enter the complaint into the computer database while in the field or when he/she returns to the office.

D. AREA WIDE COMPLAINT EPISODES

1. Area-wide complaint episodes are generally the result of an unusual occurrence such as a large accidental fire or an industrial incident resulting in emissions of air contaminants that are readily detected by the public.
2. When a complaint episode occurs which is of such magnitude that it cannot be handled by the area inspector, compliance division staff should immediately alert the compliance manager and the appropriate supervising inspector in order to assign the additional personnel within the area to handle the situation.

E. ARB, EPA REFERRAL

Complaints referred by the ARB or EPA are normally received by telephone, with written notification to follow. These complaints will be entered into the computer database and assigned as soon as possible. Inspectors will be sent a copy of ARB and EPA's written complaint as soon as it is received.

F. CANCELLATION

Complaints may be cancelled for the following reasons:

1. A second complaint is received on the same day for the same source from the same person.
2. A second complaint is received on the same day from a related person in the same household.
3. The source of the complaint is located outside the District.
4. The source of the complaint is not within the scope of the District authority.

In all cases, the complainant should be contacted and advised of District actions.

G. COMPLAINTS FROM SCHOOLS (WATERS BILL – AB 3205)

If the principal of a school contacts the District to request an investigation of odors or possible air pollution sources as the cause of illness among school children, the District must respond and notify the city or county office responsible for administering hazardous materials policies and the fire department having jurisdiction as soon as possible.

The inspector who receives this complaint is responsible for notification.

H. GASOLINE DISPENSING FACILITY COMPLAINTS

Gasoline dispensing facility complaints should be entered into the computer database and forwarded to the appropriate District inspector.

II. FIELD INVESTIGATION

A. GENERAL

1. Complaint responses will take precedence over all other assignments with the exception of violations in progress.
2. When the area inspector is unavailable, an alternate inspector will be assigned the complaint.
3. After a complaint has been assigned, the inspector should first call and talk to the complainant and then decide whether to investigate the source or contact the complainant in person.
4. If there is a possibility that a violation is in progress and the inspector is confident that the complainant has accurately identified the source, the complaint response should begin with the investigation of the suspected source of the complaint. With odor complaints it is best to verify the odor before

investigating the suspected source.

5. Upon arrival at the scene, every effort will be made to avoid obvious identification of the complainant (do not park in front of the complainant's home when the complaint source is in the vicinity). The complainant will not be identified to anyone who is not an employee of the District.
6. If the complainant is not at home, the inspector will leave a message.

B. CUSTOMER SERVICE

The following guidelines will be followed when conferring with the complainant:

1. Inspectors will identify themselves by name and agency in a friendly manner.
2. Inspectors will be courteous and objective.
3. The complainant will be allowed to tell their story without unnecessary interruptions. When facts appear, the inspector should repeat them aloud for verification and write them down.
4. After the complainants have expressed themselves, the inspector should proceed with a line of questioning which will determine the cause, nature, and source of the air pollution problem cited in the complaint.
5. Ask the complainant how he expects the complaint to be resolved.
6. Inspectors will explain the laws involved and evidence necessary to proceed with enforcement action.
7. Do not promise any legal action nor commit the District to any course of action.
8. Always try to deliver your message in a positive manner, even if the message may be unwelcome.
9. Do not solicit complaints.

C. COMPLAINT INTERVIEW

In order to obtain the necessary data, the following should be obtained:

1. Name and location of the suspected source;

2. Description of the problem and its frequency;
3. Time of day the problem was first noticed;
4. Duration of problem at each occurrence;
5. Names and addresses of affected persons.
6. Location and extent of property damage, if any.
7. Description and frequency of any illness or symptoms alleged to have resulted from exposure to air contaminants. Report any observed or reported symptoms such as nausea, vomiting, headache, sore throat, cough, eye irritation.
8. Description of odors, if any.
9. Any other information the complainant may have that will relate the problem to a specific source.
10. If soiling or other property damage is reported, the inspector should examine the citizen's property. The pattern of fall-out may indicate their origin.
11. If an odor, fall-out, or other pollutant is detected at the complainant's property, the wind direction must be determined for the purpose identifying the source.

D. INSPECTION OF THE ALLEGED SOURCE

To establish a nuisance, the source responsible for the offending emission must be identified.

When investigating the source the inspector should:

1. Identify him/herself and explain that he/she is investigating a complaint.
2. Ask pertinent questions based on information acquired from the investigation.
3. Inspect the equipment and compare actual operating conditions, cycles, and times of operation with the times and frequencies of complaints.
4. Obtain wind data from a nearby facility, e.g. airport, air monitoring station, or industry.

E. COMPLAINT CONFIRMATION

A confirmed complaint means either an inspector, another employee of the District, or a reliable complainant is able to testify that a particular operation or combination of operations is the source of the air contaminants. Confirmation may be accomplished through in the following ways:

1. Personal observation by an inspector or another District employee with the complainant (face-to-face confirmation). This would require that the inspector trace the air contaminant from the complainant's residence or place of business to the alleged source.
2. A reliable complainant makes confirmation. A reliable complainant is a person that has previously had a complaint confirmed that meets all the requirements listed in number 1 above.
3. The identification of a source of air contaminants that is supported by data such as: operational records, wind charts, and monitoring devices that show a correlation between complaints and source activities.

F. NON-SPECIFIC COMPLAINT

The cause of the complaint may not always involve air pollution. Although most complaints are related to air pollution, some will concern problems over which the agency has little or no control because they are not related to air pollution; e.g. backyard feuds and naturally occurring contaminants, resentment towards a nearby source.

Although the District may not have jurisdiction in certain cases the inspector should refer the complaint to an appropriate agency. Additionally, the complainant must be informed of the District's actions.

If complaints are unsubstantiated, the inspector will document that fact.

III. VIOLATION NOTICE OF CRITERIA

A. GENERAL

If during a complaint investigation the inspector observes a violation of a District regulation, a Notice of Violation shall be issued.

B. PUBLIC NUISANCE

A NOV for a nuisance **shall not** be issued until the incident has reviewed by the Director of Compliance.

C. Public Emergency

District management may authorize issuance of a NOV in the case of an obvious public emergency even though complaints have not been received, e.g., when forced evacuation is instituted or major transportation arteries are impacted.

IV. NUISANCE

Rule 4102

California Health and Safety Code Section 41700

"No person shall discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which cause, or have a natural tendency to cause injury or damage to business or property."

A. EXEMPTIONS

Rule 4102 and Health and Safety Code, Section 41700, do not apply to odors from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

B. CRITERIA

A nuisance can occur under a variety of conditions and circumstances. The following criteria are general guidelines to be considered in determining whether a nuisance has occurred, but the final determination of the occurrence of a nuisance is the responsibility of District management.

1. When five (5) complaints from different individuals have been confirmed in a 24-hour period. One household represents one complaint.
2. When less than five (5) complaints have been confirmed but special circumstances are present, such as when there are a limited number of affected people in the vicinity of an offending source, or a representative of a school complains on behalf of the students or staff.
4. The receipt of one or more confirmed complaints that a source is discharging air contaminants that cause injury to a person or damage to a business or property.

C. CHRONIC, ONGOING NUISANCES

For those sources of emissions which have been determined by the Director of Compliance to be responsible for chronic, on-going nuisance situations in a given community, the regular procedure for confirmation of odor complaints will not be required in all cases. Confirmations can be allowed when all of the following conditions are met:

1. An inspector detects the emissions within a reasonable distance of the complainant's address within 2 hours of the time of the complaint.
2. The inspector confirms that the emissions in the community on the day in question are attributable to the given source's operations.
3. The inspector confirms at least one other complaint against the source on a face-to-face basis in the general vicinity of the given complainants' address.

D. Civil Injunction, Abatement Order, Permit Revocation, and Additional Remedies

Persistent public nuisance cases will be initially handled through an office conference and, when appropriate, also under CH&SC Section 42402.

When the problem cannot be resolved at the office conference level, an Abatement Order may be sought under CH&SC Section 42451 or a Civil Injunction under CH&SC Section 41513.

In all actions brought before the Hearing Board for the abatement of a nuisance, the complainants must be notified of the Hearing.

V. COMPLAINT REPORT

The District Complaint database shall be used to enter all findings and conclusions related to the complaint. If a NOV is issued, an NOV report shall be generated.

1. If hard copy attachments or photographs related to the complaint are received or generated as a result of the investigation, a hard copy of the complaint report shall be printed when the complaint investigation is completed. All attachments shall be filed with the report in the complaints file.
2. If no attachments or photographs are generated as a result of the investigation, a complaint report does not need to be printed or filed.
3. Always immediately alert your supervisor of any public health hazards or issues of a controversial nature.

APPENDIX G – EXCERPT FROM ODOR COMPLAINT TRACKING SHEET



NOTE: Sample Only: Odor Complaints Have Been Tracked From 2012 to Present

©2021, Yorke Engineering, LLC

Excerpt of Diamond Pet Odor Complaints late 2020 - 2021									
COMPLAINT RECORD DATE OF UPDATE: MO/DD/YYYY									
							Confirmed?		NOTES
Day	Date	Time	Location	City	Total (Month)	No	Yes	Month	
Wed	11/11/2020	11:17 AM	Laurelwood	Ripon	3	1	0	November	Not confirmed. SJVAPCD indicates complainant detected odor at Mt Airy Ct (near Ripona Elementary)
Thurs	11/12/2020	7:59 PM	Laurelwood	Ripon		1	0		Not confirmed. SJVAPCD indicates detected at Mt Airy Ct (near Ripona Elementary)
Monday	11/16/2020	10:25 AM	Laurelwood	Ripon		1	0		Not confirmed.
Thurs	12/3/2020	1:28 PM	Laurelwood	Ripon	1	1	0	December	Not confirmed. SJVAPCD arrived in area east of 99 at 1:45 pm (17 min response time!)
Friday	1/8/2021	2:50 PM	Not Provided (possible Laurelwood)	Ripon	2	1	0	January	Not confirmed; compainant did not identify/did not call back to District; District in area 4:00; did not confirm.
Sun	1/10/2021	12:45 PM	Not Provided (possible Laurelwood)	Ripon		1	0		Not confirmed; District inspector tried to call; District arr 2:15; drove around. Drove up and down-wind of Laurelwood area.
Tuesday	2/9/2021	4:23 PM	Not Provided (possible Laurelwood)	Ripon		1	0	February	Not confirmed; complainant: "odors lasted 1.5 hrs". SJVAPCD responded within 30 min!

APPENDIX H – SAMPLE MONTHLY ODOR REPORT TO CITY OF RIPON

Randy Frazier (RFrazier@YorkeEngr.com)

From: Jessica Mohatt (JMohatt@YorkeEngr.com)
Sent: Friday, February 26, 2021 4:39 PM
To: 'Ken Zuidervaart'
Cc: Randy Frazier (RFrazier@YorkeEngr.com); Mark Ferguson (mferguson@diamondpet.com); Joe Garcia (jgarcia@diamondpet.com); Jodi Smith
Subject: Diamond Pet Foods Odor Complaint Summary – Jan 2021
Attachments: DPF Odor Complaint_1-8-21.pdf; DPF Odor Complaint_1-10-21.pdf

Dear Mr. Zuidervaart:

On behalf of Diamond Pet Food – Ripon (DPF – Ripon), Yorke Engineering, LLC has prepared the following summary of odor complaints received by the San Joaquin Valley Air Pollution Control District (SVAPCD) for the month of January 2021 alleged to be caused by DPF - Ripon. Table 1 summarizes the complaints reported to DPF – Ripon by the SVAPCD. A total of two complaints were received by SVAPCD staff during the month. None of the complaints were confirmed by SVAPCD staff. Attached are diagrams showing the wind data collected from DPF – Ripon’s onsite weather station at the time each odor complaint was received. The attached maps indicate the wind speed and direction at the time of the complaints.

Table 1: Summary of Odor Complaints Received by the Valley Air District

Date	Time	Approximate Location	Distance and Wind Direction to Approximate Location	Wind Speed and Direction	SVAPCD Investigation Result
1/8/2021	2:50 pm	Unknown – presumed Laurelwood	2,000 ft 225°	245° 4.9 mph	Unconfirmed
1/10/2021	12:45 pm	Unknown – presumed Laurelwood	2,000 ft 225°	256° 3.0 mph	Unconfirmed

DPF – Ripon continues to operate and maintain the Regenerative Thermal Oxidizers (RTOs) in accordance with the procedures laid out in the previously submitted Odor Management Plan.

Please do not hesitate to contact me if you have any questions or concerns regarding any of these events, as we have some further data that can be discussed.

Best regards,

Yorke Service Areas Include: Air Quality, Storm Water, Hazardous Waste, Industrial Hygiene-Safety, and CEQA Technical Reports. For More Info: www.YorkeEngr.com/Services.

Jessica Mohatt, CAPP, QISP | Merced Office Engineer

O: (209) 662-7500 | M: (209) 446-0227
JMohatt@YorkeEngr.com | [V-card Link](#)

APPENDIX I – OMP REVIEW TEMPLATE

Odor Management Plan Review

Diamond Pet Foods of Ripon (DPF-Ripon)

Frequency: Every 5 calendar years or as needed

Review Date	Reviewer and Title

Date of Last Review	25-Feb-21
Confirmed Complaints Since Last Review	
Number and Level of Tiered Odor Responses Since Last Review	
Summary of Any Process Changes with Potential Odor Impacts (i.e. significant changes to raw material handling, recipes, production rates, maintenance frequency, etc.)	

OMP Section	OMP Modifications Needed	Comments
1.0 Executive Summary		
2.0 Facility Information		
3.0 Odor Emitting Activities		
3.1 Pet Food Production Emissions		
3.2 Indirect Emission Sources		
4.0 Odor Control Practices		
4.1 RTO Automatic Maintenance Sequence		
4.2 Administrative Control Procedures		
4.3 Maintenance Frequency		
4.4 Engineering Controls		
5.0 DPF Complaint Tracking and Response		
5.1 General Reporting		
5.2 Tier 1 Odor Response		
5.3 Tier 2 Odor Response		
5.4 Tier 3 Odor Response		
5.5 DPF Compliance Tracking Flowchart and Contacts		
5.6 Methods for Filing Odor Complaints		
6.0 OMP Preparers and Agency Contacts		
6.1 OMP Preparers		
6.2 OMP Reviewing Agency (CEQA Lead Agency)		
7.0 References		

Revision Date: 2/25/2021