

THE BOARD OF SUPERVISORS OF THE COUNTY OF STANISLAUS
ACTION AGENDA SUMMARY

DEPT: ENVIRONMENTAL RESOURCES *KMW*
Urgent _____ Routine x
CEO Concurs with Recommendation YES *opt* NO _____
(Information Attached)

BOARD AGENDA # B-10
AGENDA DATE January 30, 2001
4/5 Vote Required YES _____ NO *✓*

SUBJECT:

ACCEPT THE STATUS REPORT REGARDING MODESTO TALLOW COMPANY

STAFF
RECOMMEN-
DATIONS:

ACCEPT THE STATUS REPORT REGARDING MODESTO TALLOW COMPANY

FISCAL
IMPACT:

There is no fiscal impact.

BOARD ACTION

No. 2001-73

On motion of Supervisor Blom, Seconded by Supervisor Mayfield,
and approved by the following vote,

Ayes: Supervisors: Mayfield, Blom, Simon, and Chair Paul

Noes: Supervisors: None

Excused or Absent: Supervisors: None

Abstaining: Supervisor: Caruso

1) X Approved as recommended

2) _____ Denied

3) _____ Approved as amended

Motion:

ATTEST: REAGAN M. WILSON, Clerk

By: *Cristine Ferrare* Deputy

File No.

ACCEPT THE STATUS REPORT REGARDING MODESTO TALLOW COMPANY

Page 2

DISCUSSION: This agenda item is important to ensure a safe and healthy community and to take pride in our local community. The Department of Environmental Resources presented its last update regarding Modesto Tallow Company to the Board on July 11, 2000.

All but one of the permit requirements with June and July 2000, compliance dates have been satisfied. Areas in compliance included the operation of the feather hydrolyzing area under negative pressure and odor control mechanisms. Requirements pertaining to the dead stock room were not met.

According to a schedule approved by the San Joaquin Valley Air Pollution Control District (SJVAPCD), by July 1, the dead stock building was to be "fully enclosed, under negative pressure, and served by odor control equipment. The dead stock room may be under refrigeration in lieu of being served by odor control equipment" (Item 11 of Attachment A). This requirement, which will be met by the installation of refrigeration, has not been complied with. The reason for the non-compliance was an engineering error in the design of the conveyor track system, according to Modesto Tallow Company officials. The track system transports the carcasses through the dead stock building.

In order for refrigeration to be effective and efficient, the building would need to be fully enclosed and fitted with doors. Because of design error, the building could not be fitted with doors. Therefore the refrigeration system cannot be used, although it has been installed. Once the re-engineered conveyor track system is installed, the building will be fitted with doors and fully enclosed, and the refrigeration system would then be started. According to the SJVAPCD, the new compliance date for refrigeration is March 31, 2001 (please see Attachment B).

Although the dead stock room is not refrigerated, representatives of Modesto Tallow Company believe that it will not contribute to odor problems this time of the year. The purpose of refrigerating the dead stock room is to impede normal biological decomposition processes, which create odors. It is the opinion of Modesto Tallow Company representatives that, during the months of December, January, February and March, the difference between the temperature in the dead stock room and the outside ambient air

would be negligible, with or without refrigeration. Therefore, the dead stock room would not be the source of odors, even though the room is not refrigerated. The SJVAPCD reports that odors are not emanating beyond the building at this time.

Although Modesto Tallow Company did not meet the negotiated compliance schedule for the dead stock room, the SJVAPCD staff is satisfied with the progress that has been made, and will not be taking any legal action.

Concerned about the extended compliance date, the Department of Environmental Resources inquired of the SJVAPCD as to the appropriateness of such an extension without legal action (please see Attachment C). The SJVAPCD's position remained constant. They confirmed that the delay was due to some legitimate engineering problems as described already. Due to the cool ambient temperatures during this time extension, the SJVAPCD was confident that odors would not be a problem.

It should be brought to the Board's attention that the compliance schedule (page 3 of Attachment A) was negotiated between the SJVAPCD and Modesto Tallow Company. This compliance schedule is not an integral part of the facility wide permit requirements. According to the SJVAPCD the compliance schedule is not an instrument for enforcement. It is more of a planning tool designed to bring the full operation into compliance with the Facility Wide Permit Requirements.

Modesto Tallow Company has satisfied all but one of the permit requirements that had November compliance dates. The requirement that was not completely satisfied is as follows:

“All process buildings and finished material storage containment areas shall be kept clean and in good repair” (item 6 of Attachment A).

While for the most part the facility is in substantial compliance with these requirements, one of the problems identified by SJVAPCD has been water accumulation under the dry finished material tanks. This area will be one of the high priority areas for road repairs. Once the road has been repaired, water will drain freely and will not collect under the tanks.

The two permit requirements that were completed by the November compliance date are as follows:

1. “Finished product shall be loaded into trucks in a manner that will minimize spillage onto the ground or entrainment into the ambient air” (item 9 of Attachment A). In order to meet this requirement, a transfer station was installed. This transfer station is a pit with an auger and a lid that closes while the material is moved into the truck for transfer. This has been very effective in minimizing spillage and entrainment.
2. “All finished products shall be stored in enclosed containers that may include, but not limited to, buildings, bins, and silos” (item 10 of Attachment A). The SJVAPCD reports that all finished materials are being stored in enclosed containers.

The remaining permit requirement, which has a compliance date of January 1, 2002, is as follows:

“All roadways, parking areas, load out areas, and staging areas shall be paved and maintained in good condition to mitigate odors that may constitute a nuisance” (Item 5 of Attachment A). “Interim repairs to roadways will be made (site plan identifying areas is being developed)” (per footnote on Attachment A).

In a letter to Modesto Tallow Company, the SJVAPCD expressed concern about the timing of the roadwork (please see Attachment D). They have requested “a high priority placed on potholes and areas where fluids accumulate”. This would include the ramp for the feather hydrolyzing area as well as the area under the dry finished product storage tanks. Recognizing that the work would be done incrementally, the intention is to correct the problem areas prior to the summer heat. If permanent repairs are not accomplished prior to summer, temporary methods of repair will be used to take care of the high priority areas.

Attached to the same letter noted above, is an updated “Modesto Tallow Facility Wide Permit Condition Status” sheet (Page 3 of

Attachment D). Take note that item 17 relates to the provision for training, with a "scheduled date" of March 1, 2000. It has been previously reported by SJVAPCD that training had been established as part of their standard operating procedures. As processing new materials is introduced, new procedures must be developed. The introduction of new procedures requires additional training. It is reported by the SJVAPCD that the training policy is currently under revision by the Modesto Tallow Company, with a modified date of completion being January 31, 2001.

As noted in the chart below, there was a significant reduction in the number of complaints over the last year.

Month and Total	Number of Complaints per Month for Respective Years	
	1999	2000
July	55	5
August	43	14
September	47	13
October	41	5
November	8	0
December	1	0
Total	195	37

The SJVAPCD believes that the decreases in the number of complaints are attributable to the improvements at Modesto Tallow Company.

Department staff will continue to monitor Modesto Tallow Company's progress in meeting the permit requirements of the SJVAPCD. The Department will update the Board routinely.

POLICY
ISSUE:

Acceptance of this status report is consistent with the Board's priority of ensuring a safe, healthy community.

STAFF
IMPACT:

None.

San Joaquin Valley Air Pollution Control District

FACILITY: N-2049-0-0

EXPIRATION DATE: 11/30/2003

FACILITY-WIDE REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions from any single source operation shall be no more than 0.1 gr/dscf and visible emissions from any single emission point shall be less than 20% opacity. [District Rules 4101 and 4201]
3. The Air Pollution Control District must be notified as soon as practical of any breakdown, malfunction, event, or action as to cause a malodorous release that may constitute a nuisance odor. [District Rule 4102]
4. The rendering facility, associated equipment, odor control equipment, ductwork, and facility grounds shall be properly maintained and operated in such a manner as to mitigate odors that may constitute a nuisance. All areas of the facility, including all process and storage equipment, are to be kept clean and free from spillage of raw or finished products, refuse, or standing pools of liquid. [District Rule 4102]
5. All roadways, parking areas, load out areas, and staging areas shall be paved and maintained in good condition to mitigate odors that may constitute a nuisance. [District Rule 4102]
6. All process buildings and finished material storage containment areas shall be kept clean and in good repair. [District Rule 4102]
7. All process equipment at this facility shall be maintained and operated in such a manner to minimize fugitive emissions that may constitute a nuisance. [District Rule 4102]
8. All solid and liquid material shall be expeditiously disposed of or processed to mitigate odors that may constitute a nuisance. [District Rule 4102]
9. Finished product shall be loaded into trucks in a manner that will minimize spillage onto the ground or entrainment into the ambient air. [District Rule 4102]
10. All finished products shall be stored in enclosed containers that may include, but are not limited to, buildings, bins, and silos. [District Rule 4102]
11. The Feather Plant Hydrolyzing area, Rendering Plant, and the Dead Stock buildings including all receiving pits and processing equipment associated with each shall be fully enclosed, under negative pressure, and served by odor control equipment. The buildings shall be equipped with inlets for efficient air mixing and air movement to the odor control equipment. Openings to the buildings shall be controlled so each building remains under negative pressure at all times except during the entry or exit of trucks or personnel. The Dead Stock room may be under refrigeration in lieu of being served by odor control equipment. If the District determines that fugitive emissions from the feather dryer are inadequately captured, the facility must take measures to control the emissions. Such measures include but are not limited to enclosing the area and venting to control equipment. [District Rule 4102]
12. All raw materials to be processed shall be unloaded as soon as possible but not to exceed 4 hours of entering the facility grounds unless the vehicle carrying this material is placed in an area that prevents the exposure of the raw material to direct sunlight. The amount of material stored and or staged, which is to be processed by the feather plant shall not exceed 40 tons. The amount of material stored and or staged, which is to be processed by the rendering (meat and bone meal plant) operation shall not exceed 84 tons. [District Rule 4102]

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: MODESTO TALLOW CO INC
Location: 925 CROWS LANDING RD, MODESTO, CA 95351

ATTACHMENT A - Page 1 of 3

Facility-wide Requirements for N-2049-0-0 (continued)

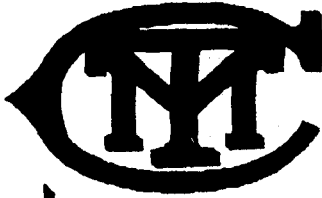
13. All raw materials must be processed within 24 hours of receipt. All raw materials that cannot be processed within a 24 hour period must be disposed of off site or stored such that the odors from the raw material are processed through an odor control device. [District Rule 4102]
14. If the District determines that the raw material stored or staged outside is causing a nuisance then the facility must take measures to immediately mitigate the problem and ensure that this condition will not be duplicated. Such measures may include but are not limited to enclosures around the affected areas. All staging areas shall only be used for fresh material. [District Rule 4102]
15. All trucks and vehicles shall be washed following unloading and before leaving the unloading area. All raw material trucks shall be maintained so as to prevent leakage of solid and liquid material. [District Rule 4102]
16. If the District determines that the DAF and solids skimmer (including the collection bin) are causing a nuisance then the facility must take measures to ensure that this condition will not be duplicated. Such measures may include but not limited to enclosures around the affected areas. [District Rule 4102]
17. Training of personnel pertaining to plant procedures and operations needed to maintain the effectiveness of the current odor control measures shall be implemented and conducted on a routine basis. Training shall also include the presentation of district permit conditions to MTC personnel. Documentation of the training attendees and the dates and types of training must be maintained on the premises. [District Rule 4102]
18. The facility shall maintain continuous records of wind speed and direction using a calibrated anemometer and wind vane. These records shall be retained on site for at least 3 years and made available to the District upon request. [District Rule 4102]
19. Daily records of all incoming raw material received shall be maintained and made immediately available to the District upon request. The records shall include the type of material, the amount of that type of material, and the time received. These records shall be retained on site for at least 3 years. [District Rule 4102]
20. An annual throughput/production report shall be submitted at the end of each calendar year. This report is due no later than March 31 for the previous year. This report must include actual amounts of materials processed. Each type of material and each type of process must be listed separately. [District Rule 4102]

These terms and conditions are part of the Facility-wide Permit to Operate.

Modesto Tallow
Subject Facility Wide Permit

Item	Description	Solution	Completion Date
3.	Notification	Policy	March 1, 2000
4.	General Maintenance	Policy, Repair and Maintenance	July 1, 2000
5.	Roadways	Repair and Maintenance. New construction	January 1, 2002*
6.	Building/Containments	Install new tanks. Repair and	November 1, 2000
7.	Equipment	Policy	July 1, 2000
8.	Expeditions Disposal	Policy	March 1, 2000
9.	Finished Product Loading	Repair and maintenance	November 1, 2000
10.	Finished Product Storage	New Tanks	November 1, 2000
11.	Building and Odor Control	Deadstock building	July 1, 2000
12.	Raw Material Storage	New Shed	July 1, 2000
13.	"24" hour rule	Policy	March 1, 2000
14.	If/then: Raw Material		Unknown
15.	Truck/Vehicle Maintenance	Policy	June 1, 2000
16.	If/then: Wastewater Area		Unknown
17.	Training	Policy	March 1, 2000
18.	Wind speed monitoring	Start (3) years of information	Completed
19.	Incoming Raw Records	Start (3) years of information	Completed
20.	Annual Throughput	Existing Condition	Completed

*Interim repairs to roadways will be made (site plan identifying areas is being developed) with final completion by this date.



MODESTO TALLOW CO.

MANUFACTURERS OF

MEAT BONE AND POULTRY BY PRODUCTS • HYDROLYZED FEATHER MEAL
HIDES • TALLOW • GREASE

Thursday, November 16, 2000

Roland D. Brooks
San Joaquin Valley Unified APCD
4230 Kiernan Avenue
Modesto, CA 95356

RE: Response to your October 26, 2000 Letter

Dear Roland:

Thank you for concurring with Modesto Tallow Co. (MTC) about the significant improvements made by MTC at it Modesto facility and that as a result " the number of odor complaints have diminished significantly this year".

As for the issues outlined in the District's October 26 letter based on the October 13, 2000 walk through inspection by the District, MTC's response, as requested, is as follows:

1. New Skinning Room Receiving Area:

A skirt/cover is being designed to prevent the buildup of material on the auger support.
Completion date: February 28, 2001

2. Non-treated wastewater:

MTC has a policy in place to direct all wastewater streams directly to the plant drainage system.

3. Smoke Emissions:

As Discussed during the walk through, MTC has made improvements to the capture and transport of point source emissions in the processing area and will continue to make needed modifications to improve the collection system. Point source fugitive emissions, if released into the plant atmosphere, are processed through the odor control equipment, which is the room air scrubber.

4. Cooker and Process Equipment Cleaning.

MTC's maintenance policy addresses leaks on an on-going basis. In many cases, the equipment is designed to leak, such as the packing glands on the main cookers. The minor leakage acts as a lubricant for the packing; thereby reducing wear of the equipment.

5. Raw Material Storage Area

MTC has met the raw material storage criteria on a regular basis. Outside of the agreed volumes in the facility wide permit, a concerted effort has been made to move material as quickly as possible to covered areas. A new deadstock program, which includes monitoring of drop-off animal, will improve this situation.

6. Receiving Area and Skinning floor: (DEAD STOCK BLDG)

- a. Phase 1: Rail redesign
- b. Phase 2: Electrical
- c. Phase 3: Awning
- d. Phase 4: Production Improvements

February 15, 2000
 March 31, 2000
 May 31, 2000
 As Needed

} SHOULD
 BE
 2001
 =

Please review the detail list enclosed.

7. Roadwork:

MTC expects to have a timeline after the Spring of 2001

8. Maintenance and Cleaning Schedule:

MTC will submit a Standard Operating Procedure (SOP) for the maintenance and cleaning schedule for the facility by January 31, 2001. MTC does follow a scheduled program but has not combined all aspects into a SOP. MTC appreciates the District's observation that the "facility is in pretty good shape".

If you have questions, please do not hesitate to call me at (209) 948-0209.

Sincerely,



Jeff Podesto

CC: Mel R., Texas
Bill E. Modesto

NOV-16-00 THU 09:18 AM CAL SPRAY DRY

FAX NO. 209 948 0629

P. 04

Deadstock Floor
Detailed agenda for completion
Modesto Tallow Co.

Phase	Status	Completion Date
Phase 1		
Trolley System	Onsite, Install	2/15/01
Landing Rail	Onsite, Install	2/15/01
First-Second Leg Transfer	Onsite, Install	2/15/01
Hydraulic Supply	Onsite, Install	2/15/01
Hide Puller	Onsite, Install	2/15/01
Carcass Screw	Onsite, Install	2/15/01
Door #1	Build and Install	2/15/01
Electrical: Stage 1	Minor changes, finish	2/15/01
Phase 2		
New MCC, Electrical	Power up complete system	3/31/01
Roofing System	Insulation and Roof	3/31/01
Door *2	North Rollup Door	3/31/01
Refrigeration System	Installed, Startup only	3/31/01
Phase 3		
Awning	Purchase and Install	5/31/01
Phase 4		
Power Chain	Install	All items as needed
Calf Transfer	Install	"
Grinder	Purchase and Install	"
Bridge	Design, purchase, and Install	"



December 11, 2000

Mr. David Crow
Air Pollution Control Officer
San Joaquin Valley Unified Air Pollution Control District
1990 E. Gettysburg
Fresno, CA 93726

Dear David:

The Environmental Resources Department has been monitoring the progress that Modesto Tallow Company is making towards complying with the Air District's "Facility-Wide Requirements," which are part of the facility's Air Permit to Operate. On a regular basis, we provide updates on the facility to the Stanislaus County Board of Supervisors. Your Salida office staff has been most helpful in updating us about progress at Modesto Tallow Company, and attending the Board updates to provide information to the Board. Thank you for that assistance.

While researching facility compliance for an update, we found that Modesto Tallow Company did not comply with the July 1 requirements pertaining to the dead stock building. By that date, the dead stock room was to be refrigerated and fully enclosed (please see the attached schedule). District staff, and the facility operator, told me that engineering problems would delay the implementation of the dead stock room requirements until August 1.

My staff and I, accompanied by Air District staff, visited Modesto Tallow Company on November 1. We found that the dead stock room refrigeration equipment was not operable, and the building was not enclosed. To date, the requirements have still not been met.


In a letter to the Air District dated November 16, 2000, Modesto Tallow Company owner, Jeff Podesto, specified that the required improvements to the dead stock room would be completed by March 31, 2001. If the improvements are completed by that date, Modesto Tallow Company would have missed the original compliance date by eight months.

Mr. David Crow
December 11, 2000
Page 2

Apparently, the new compliance date has been accepted by Air District staff, and they have told me that there would be no consequences for the non-compliance. Given the concerns the community has about the facility, it seems more appropriate that the Air District take formal action to address the non-compliance. This would not only reassure the community but would provide incentive to the operator to comply with the District's requirements. I encourage the Air District to take appropriate action regarding non-compliance with Air Permit requirements.

Thanks again for the assistance your staff has provided us, and for your consideration of my concerns. I would appreciate it if you would provide to us copies of any correspondence the Air District sends and receives regarding Modesto Tallow Company.

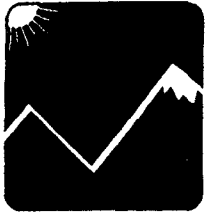
Sincerely,



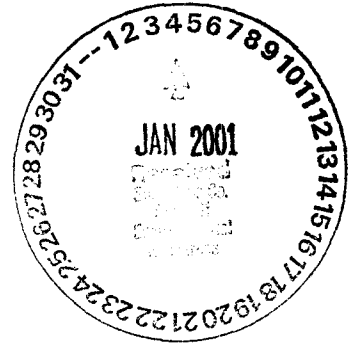
Kevin M. Williams
Director

Attachment

cc: Roland Brooks, San Joaquin Valley Unified APCD, Manager
Reagan Wilson, Stanislaus County, CEO



San Joaquin Valley
Air Pollution Control District



December 28, 2000

Jeff Podesto
Modesto Tallow Company
P.O. Box 1036
Modesto, CA 95353

RE: Modesto Tallow Facility

Dear Jeff Podesto:

The District, following the review of recent correspondence and site inspections, has determined that the majority of the Facility-Wide Permit conditions have either been completed or are in the process of being completed. However, some of these incomplete conditions have been delayed for various reasons and have missed the original scheduled completion dates. Attached for your review is a status report of work accomplished compared to your scheduled completion dates. If you observe any errors in this report, please let us know so we can update our files.

It is important to adhere as closely as possible to these scheduled dates to assure that work is completed before the summer of 2001 (except for the roadwork). Failure to do so may lead to potential enforcement action. Also for your information, we are enclosing a copy of a letter from the Department of Environmental Resources regarding their concern about missed scheduled completion dates.

In our discussions about the scheduled roadwork, you indicated your plan was to accomplish this task incrementally during 2001 with a final completion date of January 1, 2002. The District is concerned about the timing of this work and wants a high priority placed on potholes and areas where fluids accumulate. This includes the receiving area and the ramp to the old dead stock area now

David L. Crow
Executive Director Air Pollution Control Officer

Northern Region Office
4230 Kiernan Avenue, Suite 130
Modesto, CA 95356-9322
(209) 557-6400 ♦ FAX (209) 557-6475

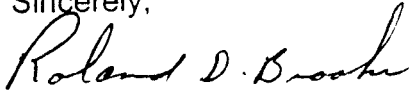
Central Region Office
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
(559) 230-6000 ♦ FAX (559) 230-6061

Southern Region Office
2700 M Street, Suite 275
Bakersfield, CA 93301-2370
(661) 326-6900 ♦ FAX (661) 326-8907

being used to receive feathers. In the event that permanent repairs are not completed in these areas prior to this summer, then these areas need to be patched as temporary repairs.

If you have any questions, please call Roland D. Brooks at (209) 557-6400.

Sincerely,



Mark Boese
Deputy APCO

C: Kevin Williams

MODESTO TALOW FACILITY WIDE PERMIT CONDITION STATUS (12/13/00)

CONDITION	DESCRIPTION	PROPOSED SOLUTION	SCHEDULED DATE	MODIFIED DATE	STATUS
3	Notification	Policy	03/01/2000		Complete
4	General Maintenance	Policy, Repair and Maintenance	07/01/2000		Complete
5	Roadways	Repair and Maintenance. New Construction	01/01/2002		
6	Buildings/Containments	Install New Tanks. Repair and Maintenance	11/01/2000		
7	Equipment	Policy, Continual Repair and Maintenance	07/01/2000		Complete
8	Expeditious Disposal	Policy	03/01/2000		Complete
9	Finished Product Loading	Repair and Maintenance	11/01/2000		Complete
10	Finished Product Storage	New Tanks	11/01/2000		Complete
11	Building and Odor Control	Deadstock Building	07/01/2000	03/31/2001	
12	Raw Material Storage	Keep In Enclosed Trailers	07/01/2000		Complete
13	"24" hr Rule	Policy	03/01/2000		Complete
14	If/ Then: Raw Material		UNKNOWN		Complete
15	Truck Vehicle Maintenance	Policy	06/01/2000		Complete
16	If/Then: Wastewater Area		UNKNOWN		Complete
17	Training	Policy	03/01/2000	01/31/2001	
18	Wind Speed Monitoring	Start 3 yrs of Information	Complete		Complete
19	Incoming Raw Records	Start 3 yrs of Information	Complete		Complete
20	Annual Throughput	Existing Condition	Complete		Complete



RECEIVED
DEC 12 2000

December 11, 2000

Mr. David Crow
Air Pollution Control Officer
San Joaquin Valley Unified Air Pollution Control District
1990 E. Gettysburg
Fresno, CA 93726

Dear David:

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Sincerely,



Kevin M. Williams
Director

Attachment

cc: Roland Brooks, San Joaquin Valley Unified APCD, Manager
Reagan Wilson, Stanislaus County, CEO

San Joaquin Valley Air Pollution Control District

FACILITY: N-2049-0-0

EXPIRATION DATE: 11/30/2003

FACILITY-WIDE REQUIREMENTS

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6. All process buildings and finished material storage containment areas shall be kept clean and in good repair [District Rule 4102]
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8. All solid and liquid material shall be expeditiously disposed of or processed to mitigate odors that may constitute a nuisance. [District Rule 4102]
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12. All raw materials to be processed shall be unloaded as soon as possible but not to exceed 4 hours of entering the facility grounds unless the vehicle carrying this material is placed in an area that prevents the exposure of the raw material to direct sunlight. The amount of material stored and or staged, which is to be processed by the feather plant shall not exceed 40 tons. The amount of material stored and or staged, which is to be processed by the rendering (meat and bone meal plant) operation shall not exceed 84 tons. [District Rule 4102]

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: MODESTO TALLOW CO INC
Location: 925 CROWS LANDING RD, MODESTO, CA 95351

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Facility-wide Requirements for N-2049-0-0 (continued)

13. All raw materials must be processed within 24 hours of receipt. All raw materials that cannot be processed within a 24 hour period must be disposed of off site or stored such that the odors from the raw material are processed through an odor control device. [District Rule 4102]
14. If the District determines that the raw material stored or staged outside is causing a nuisance then the facility must take measures to immediately mitigate the problem and ensure that this condition will not be duplicated. Such measures may include but are not limited to enclosures around the affected areas. All staging areas shall only be used for fresh material. [District Rule 4102]
15. All trucks and vehicles shall be washed following unloading and before leaving the unloading area. All raw material trucks shall be maintained so as to prevent leakage of solid and liquid material. [District Rule 4102]
16. If the District determines that the DAF and solids skimmer (including the collection bin) are causing a nuisance then the facility must take measures to ensure that this condition will not be duplicated. Such measures may include but not limited to enclosures around the affected areas. [District Rule 4102]
17. Training of personnel pertaining to plant procedures and operations needed to maintain the effectiveness of the current odor control measures shall be implemented and conducted on a routine basis. Training shall also include the presentation of district permit conditions to MTC personnel. Documentation of the training attendees and the dates and types of training must be maintained on the premises. [District Rule 4102]
18. The facility shall maintain continuous records of wind speed and direction using a calibrated anemometer and wind vane. These records shall be retained on site for at least 3 years and made available to the District upon request. [District Rule 4102]
19. Daily records of all incoming raw material received shall be maintained and made immediately available to the District upon request. The records shall include the type of material, the amount of that type of material, and the time received. These records shall be retained on site for at least 3 years. [District Rule 4102]
20. An annual throughput/production report shall be submitted at the end of each calendar year. This report is due no later than March 31 for the previous year. This report must include actual amounts of materials processed. Each type of material and each type of process must be listed separately. [District Rule 4102]

Modesto Tallow
Subject Facility Wide Permit

Item	Description	Solution	Completion Date
3.	Notification	Policy	March 1, 2000
4.	General Maintenance	Policy, Repair and Maintenance	July 1, 2000
5.	Roadways	Repair and Maintenance. New construction	January 1, 2002*
6.	Building/Containments	Install new tanks. Repair and	November 1, 2000
7.	Equipment	Policy	July 1, 2000
8.	Expeditions Disposal	Policy	March 1, 2000
9.	Finished Product Loading	Repair and maintenance	November 1, 2000
10.	Finished Product Storage	New Tanks	November 1, 2000
11.	Building and Odor Control	Deadstock building	July 1, 2000
12.	Raw Material Storage	New Shed	July 1, 2000
13.	"24" hour rule	Policy	March 1, 2000
14.	If/then: Raw Material		Unknown
15.	Truck/Vehicle Maintenance	Policy	June 1, 2000
16.	If/then: Wastewater Area		Unknown
17.	Training	Policy	March 1, 2000
18.	Wind speed monitoring	Start (3) years of information	Completed
19.	Incoming Raw Records	Start (3) years of information	Completed
20.	Annual Throughput	Existing Condition	Completed

*Interim repairs to roadways will be made (site plan identifying areas is being developed) with final completion by this date.