

Background

Darling Ingredients, Inc. (Darling) is an animal rendering facility located at 429 Amador Street, San Francisco, CA 94124. Community members are concerned about odors from the facility's operations and potential exposure to pollution that may impact public health.

Is the facility subject to environmental requirements?

Darling is subject to local, state, and federal requirements related to air emissions, water quality, and hazardous materials and waste.

Who is involved in this matter?

Multiple agencies at the local, state, and federal level are responsible for regulating Darling and have been engaged in inspection and enforcement activities. The following agencies have met to coordinate on environmental compliance activities:

- San Francisco City and County Certified Unified Program Agency (CUPA)
- Bay Area Air Quality Management District (Bay Area AQMD)
- San Francisco Bay Regional Water Quality Control Board
- State Water Resources Control Board
- California Air Resources Board (CARB)
- California Department of Food and Agriculture (CDFA)
- California Environmental Protection Agency (CalEPA)
- United States Environmental Protection Agency, Region 9 (US EPA)

City & County of San Francisco CUPA Actions

The San Francisco Department of Public Health Hazardous Materials and Waste Program operates as the CUPA for San Francisco. The CUPA ensures compliance with requirements related to hazardous

materials, hazardous waste, and storage tanks. The following is a summary of recent inspections by CUPA staff at Darling:

- February 8, 2019: A routine inspection found that, while tank integrity tests were performed of the facility's aboveground petroleum storage tanks, insufficient documentation/records were kept or able to be provided by the facility.
- July 17, 2019: A routine inspection found that the facility's most recent hazardous materials inventory was missing some materials observed on site. In addition, the facility's most recent site map was lacking some required elements.
- August 8, 2022: A routine inspection found that the previously certified Spill Prevention, Control, and Countermeasures Plan was outdated and needed to be renewed/recertified.

All above identified compliance issues and violations were timely corrected.

Bay Area AQMD Actions

The Bay Area AQMD regulates air emissions and odors from Darling.

- 2018-2020: Conducted weekly inspection patrols along the Amador Street corridor where Darling is located. No violations at Darling were found.
- 2021-Fall 2022: Conducted daily inspection patrols along the Amador Street corridor where Darling is located. No violations at Darling were found.
- Fall 2022-Present: Conducts twice weekly inspection patrols along the Amador Street corridor where Darling is located. No violations at Darling were found.
- Beginning in April 2023, as part of the twice weekly inspection patrols, staff document upwind and downwind odor observations from Darling.
- Feb 2021 and Feb 2023: Conducted facility inspections to determine compliance with Air

District regulations and permit conditions. No violations were found.

- May 31, 2023: Participated in a facility inspection at Darling with US EPA and CARB.
- Jan 2019-Jul 2023: Investigated four (4) air pollution complaints alleged against Darling. Odors from the facility were detected on two of those investigations; however, no violations of permit conditions or Air District regulations were documented.
- Aug-Oct 2023: Investigated five (5) air pollution complaints alleged against Darling or related odors. Staff detected odors ranging from cooking meat-like, rancid, and or fishy during three of those investigations at or near the complainants and traced the odors back to Darling. Winds had shifted from prevailing west-southwesterly winds to north-northeast winds, which carried odors into a residential neighborhood. No violations at Darling were found.
- Nov 22, 2023: Issued Notice of Violation# A62887 for an Aug 16, 2023 permit condition violation: Darling was denied breakdown relief for failure to operate its incinerator during rendering operations.
- Nov 2023-Aug 2024: Investigated twelve (12) air pollution complaints alleged against Darling or related odors. Staff detected odors ranging from putrid, rotten, and cooking meat during three of those investigations at or near the complainants and traced the odors back to Darling. No violations at Darling were found.

State and Regional Water Board Actions

The State and Regional Water Boards regulate storm water and wastewater at Darling. Darling has coverage under the National Pollutant Discharge Elimination System (NPDES) Industrial General Permit Order No 2014-0057 (IGP) for storm water and the NPDES Pretreatment Program for wastewater. Inspections are conducted to ensure compliance with both permits by the Regional and State Water Boards and local municipalities.

- April 13, 2023: The State and Regional Water Boards found multiple violations during an IGP inspection and issued a Notice of Violation (NOV). Darling complied with all required corrective actions (e.g., provided photo documentation of cleaned drain inlets, covers for grease containers, and a spill kit for the fueling area) by the August 18, 2023 NOV deadline.
- April 27, 2023: Pretreatment program inspection by State Water Board, US EPA, and the San Francisco Public Utilities Commission (SFPUC). Recommendations by the State Water Board included increased spill and leak prevention, proper pump maintenance, and a thorough inspection by SFPUC.
- Darling is also under a Consent Decree with San Francisco Baykeeper (2017) which requires the facility to implement additional storm water Best Management Practices and sample for additional pollutants beyond the IGP requirements.
- Oct 14, 2024: The State and Regional Water Boards conducted an unannounced compliance inspection of the facility. A report is forthcoming.

CARB Actions

CARB is responsible for protecting the public from the harmful effects of air pollution and developing and enforcing programs and actions to fight climate change. For stationary sources like Darling, CARB's enforcement program helps ensure protection of public health and the environment through support and oversight of air district permitting and enforcement programs. CARB participated in a facility inspection at Darling on May 31, 2023, with US EPA and Bay Area AQMD.

CDFA Actions

The CDFA Meat, Poultry and Egg Safety Branch licenses and inspects rendering facilities that recycle animal carcasses, packing house waste, and inedible kitchen grease (IKG). Darling holds a Rendering and Inedible Kitchen Grease Transporter license with CDFA. Routine inspections of Darling show acceptable conditions and have resulted in no

violations of the Food and Agricultural Code or violations of the California Code of Regulations.

- June 9, 2023: CDFA staff conducted an inspection of Darling's rendering activities/storage methods of IKG and inedible materials. Operations were clean and in compliance. No violations were found.
- August 10, 2023: CDFA staff conducted an inspection of Darling's rendering activities/storage methods of IKG and inedible materials. Operations were clean and in compliance. No violations were found.

CalEPA Actions

CalEPA is the parent agency to six boards, departments, and offices charged with protecting public health and the environment, including CARB and the Water Boards. CalEPA has not exercised independent enforcement authority over activities at Darling but helps to ensure enforcement and compliance activities are consistent, effective, and coordinated.

Report an Odor Complaint:

Call Bay Area AQMD's 24-hour toll-free hotline at 1-800-334-ODOR (6367) or complete an online complaint form at www.baaqmd.gov/complaints.

For More Information Contact:

City and County of San Francisco CUPA

Jonathan Piakis – Sr. Industrial Hygienist & Program Manager

jonathan.piakis@sfdph.org

Bay Area Air Quality Management District

Patrick Wenzinger – Supervising Air Quality Specialist

pwenzinger@baaqmd.gov

San Francisco Bay Regional Water Quality Control Board

Brian Thompson – Senior Engineering Geologist

brian.thompson@waterboards.ca.gov

State Water Resources Control Board

Bryan Elder – Supervising Water Resource Control Engineer

Bryan.Elder@waterboards.ca.gov

US EPA Actions

US EPA coordinates with state and local environmental regulatory agencies to ensure compliance with environmental requirements. US EPA conducted or participated in the following inspections at Darling:

- April 27, 2023: Clean Water Act pretreatment program inspection by State Water Board, US EPA, and the San Francisco PUC.
- May 31, 2023: Clean Air Act inspection, accompanied by Bay Area AQMD and CARB. The inspection team toured the facility and interviewed Darling about the equipment, operations, emission controls, and current state of the facility. Areas of concern were identified and conveyed to the facility. The investigation is ongoing.
- April 23, 2024: Spill Prevention, Control, and Countermeasure inspection. US EPA identified minor plan deficiencies, and the facility was directed to correct them

California Air Resources Board

Nancy Fletcher – Staff Air Pollution Specialist

nancy.fletcher@arb.ca.gov

California Department of Food and Agriculture

Paula Batarseh – Meat, Poultry & Egg Safety Branch Chief

paula.batarseh@cdfa.ca.gov

CalEPA

Trevor Anderson – EJ Enforcement Manager

trevor.anderson@calepa.ca.gov

US EPA

Tyler Holybee – Region 9 Air Enforcement

Holybee.tyler@epa.gov