

PETITION FOR A HEARING
BEFORE THE HEARING BOARD OF THE
SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

☒ Northern Region Office
4800 Enterprise Way
Modesto, CA 95356

☐ Central Region Office
1990 E. Gettysburg Ave.
Fresno, CA 93726

☐ Southern Region Office
34946 Flyover Court
Bakersfield, CA 93308

TYPE OF HEARING

FEES (Non-Refundable)

☒ A.	Short Variance (90 Days or Less)	\$ 987.00
☐ B.	Interim & Short Variance	\$1443.00
☐ C.	Emergency Variance	\$ 343.00
☐ D.	Regular Variance	\$1136.00
☐ E.	Interim & Regular Variance	\$1592.00
☐ F.	Appeal Hearing	\$1136.00
☐ G.	Extension of Variance	\$ 456.00
☐ H.	Modification of Variance	\$ 456.00
☐ I.	Modification of Variance Schedule of Progress	\$ 456.00
☐ J.	Product Variance	\$1515.00
☐ K.	Rehearing	\$1136.00
☐ L.	Revocation of Variance	\$ 456.00
☐ M.	Special Hearing	\$1136.00

In addition to the filing fee above, an excess emissions fee will be assessed at the conclusion of the variance at \$3.00 per pound on the excess emissions emitted during the variance period. Additionally, a \$3.75 per pound mitigation fee will be assessed if excess emissions are greater than 2000 pounds.

A. NAME OF FACILITY: Darling Ingredients Turlock

PHYSICAL ADDRESS OF FACILITY: 11946 Carpenter Road

CITY: Crows Landing STATE: CA ZIP CODE: 95381

NAME OF PERSON FILLING OUT PETITION: Joel Lunsford

TELEPHONE: 972-281-4457 **E-MAIL:** joel.lunsford@darlingii.com

NAME OF PERSON AUTHORIZED TO RECEIVE NOTICES: Colton Clifford

MAILING ADDRESS: PO Box 1608

CITY: Turlock STATE: CA ZIP CODE: 95131

TELEPHONE: 209-690-3722 **E-MAIL:** CClifford@darlingii.com

B. TYPE OF ENTITY (Check One)

☐ LLC

☐ Partnership

☒ Corporation

☐ Other Entity

Please include the name, title, and address of officers, if a corporation; partners, if a partnership; or the person(s) in control, if other entity.

(Attach additional sheets, if needed)

NAME	TITLE	ADDRESS
Brad Fleeman	Regional Vice President	PO Box 1608, Crows Landing, CA 95381
William Holmes	Director of Environmental Affairs	5601 N MacArthur Blvd, Irving, TX, 75038

In accordance with State Law, the District will provide assistance to small businesses in preparing and filing the petition for the hearing. Small business has the same meaning as defined in the Small Business Administration, except that no stationary source which is a major source can be a small business.

If you plan on having attendees participate via the video teleconferencing system in a region other than that of which you filed the petition, please check the box(s) below for the region they will be participating:

☐ Bakersfield

☐ Fresno

☐ Modesto

1. Describe the type of business conducted at your facility.

Darling Ingredients Inc. (Darling) operates a food processing byproduct conversion facility which produces natural ingredients from organic raw material sources. These ingredients are used in the production of feed, food, fertilizer and fuel. The SIC code is 2077.

2. Describe in detail the equipment or activity that is the subject of this petition, what the equipment is used for, and why it is necessary to the operation of your facility. Include all pertinent information necessary to describe the activity including: fuels burned, raw materials processed, product produced, true vapor pressure of all volatile organic compounds, site diagrams, material flow charts, fuel systems, and diagrams of air pollution control systems if necessary. Provide photos as well.

Darling operates a Regenerative Thermal Oxidizer (RTO) for the abatement of VOC constituents that could potentially lead to odors from the rendering process. The organic raw material contains approximately 65% moisture. During the steam powered cooking process, that moisture is evaporated and condensed, where it is treated in an advanced wastewater treatment plant for reuse. However, there is a small portion of the vapor that does not collapse in the condenser. This non-condensable fraction of the vapor stream is treated in a series of wet packed-bed scrubbers and venturis before being sent to the RTO for thermal destruction of any remaining vapors. The non-condensable vapor stream is moved through the system at approximately 10,000 cubic feet per minute (CFM) and the RTO is fired on natural gas to temperatures in excess of 1400 degrees F for complete thermal destruction. That thermal destruction relies on ceramic media beds that provide a retention time that ensures complete combustion. We have recently discovered excessive damage to that ceramic media that requires immediate replacement. The process to replace that media and return the RTO to full compliance is expected to take five (5) days, which is longer than we can be shutdown without doing harm to the business or the community we service.

3. List all the District Permits to Operate and/or Authorities to Construct and the corresponding permit conditions for which you are requesting variance protection and **explain** how you are violating, or will violate the condition(s). Please list the current version(s).

Permit N-2107-5-10, Condition 12 (operating RTO when processing); Permit N-2107-9-21, Condition 9 (VOC emission limit); N-2107-9-21, Condition 26 (minimum combustion temperature). Because there are no products of combustion generated when the RTO is not operational, the only excess emissions would be VOC. There are still controls on the vapor process as there are a series of scrubbers and venturis that strip the VOC compounds from the vapor and return them to the wastewater treatment plant. The estimated efficiency of these scrubbers and venturis are 90%.

4. List all District Rule numbers, including subsections, for which you are requesting variance protection and **explain** how you are violating or will violate the rule(s).

District Rule 2201, see narrative above.

5. Why is it beyond your reasonable control to comply with the rule(s) and/or permit condition(s)?

The unit must be completely turned off and cooled down to less than 100 degrees (from a normal operating temperature in excess of 1400 degrees) in order for crews to safely enter and repair/replace the media beds. It will take a minimum of one (1) day to cool and four (4) days to install and repair. Due to the nature of the material we receive we cannot be shut down for that period of time. Not only do we receive material from commercial meat packers, but we also receive a large volume of animal mortalities from local farms. These products are required to be rendered and are restricted from going to landfills. Without our ability to process this material, local farmers would be forced into hardships or the potential increases that these products will be mismanaged in a way that is harmful to health and the environment.

6. What would be the harm to your business if the variance were not granted? Include business closure, economic losses in dollar amounts, breach of contracts, hardships on customers, employee lay-offs, loss of market share to competitors, etc.

Although it is hard to predict the exact economic losses in dollars, the true harm to the business is in the fallout effects of our business being shutdown for more than 24 hours. In addition to the certain breach of contract with the commercial meat processors, our inability to take this material off their hands and process it would result in the need to send much of the material to landfills. Not only is it bad for the environment to landfill this material, but the excess cost would be passed onto consumers at restaurants and grocery stores. This is all in addition to the consequences to local farmers and ranchers listed above in narrative 5.

7. What date, and under what circumstances, did your facility first become aware that it would **not** be in compliance?

February 20, 2026. We were aware as early as January 30, 2026 that the media would need to be replaced, but it took another three weeks to locate some media in stock and hire a third-party expert that could do the replacement. We had two bids to do the work, one that would take 7 days and one that would take 4 days to complete. We decided to go with the bid that would minimize the time we needed to run without being in compliance.

8. What actions have you taken since that time to achieve compliance?

As noted above, we ordered the first available ceramic media and accepted the bid of the provider that could do it in the shortest time. We are also paying extra to have two crews working in double shifts to minimize the downtime. The first available date they had to do the work was March 6, 2026. Due to the denial of an emergency variance we were forced to reschedule that work to April 10, 2026

9. Explain what options have been evaluated towards curtailment or termination of operations in lieu of obtaining a variance.

We are working with our producer partners to minimize the impact. We have also elected to do this over a weekend as there is normally a 48 hour period where we do not receive raw material over the weekend, thus minimizing the time we would be out of compliance. Additionally, we have committed to a plan where Darling would landfill any product, at our expense, if we were unable to run the scrubber and venturi system to at least partially treat the vapors during the RTO downtime. Full termination is not an option due to the impacts across multiple industries and to consumers highlighted above.

10. Estimate the excess emissions in total pounds over the duration of the variance period. *Estimate the maximum amount of excess emissions that will occur.*

Pollutant	Pollutant Limit	Actual Emissions	<i>Excess emissions are those that are in excess of the rules or permit conditions or otherwise lawfully allowed</i>	Total Estimated Excess Emissions
VOC	0.03 lb-VOC/ton raw material			718.675 lbs
NO _x				
CO				
SO _x				
PM ₁₀				
PM _{2.5}				

Highest Opacity level anticipated: <10 %

11. Show all calculations and provide references for emission factors used in estimating excess emissions.

Based on a VOC source test of the RTO in 2024, the actual emission rate is 0.0024 lbs per ton of raw material. At an estimated 99% efficiency of the RTO, that would put incoming VOC after the scrubbers at 0.24 lbs/ton raw material. On another recent test the average throughput was 41.59 tons raw material per hour. Due to the plan proposed in narrative 9, we do not anticipate more than 72 hours of total runtime without the RTO in service.

0.024 lbs/ton raw material x 41.59 ton raw material/hour = 9.9816 lb/hour
 9.9816 x 72 hours = 718.675 lbs excess emissions

12. Explain how you can reduce or mitigate excess emissions during the variance period. (such as shutting equipment down or reducing production to offset excess emissions)

As mentioned in narrative 9, we are planning the replacement to go over a time we would normally be shut down for a small period and we are only continuing to operate if the scrubbers are fully operational. We are also working with our producer partners to hold loads as long as is reasonable to delay as much production as possible until the project is wrapped up around Tuesday, April 14, 2026.

13. If there are excessive hazardous or toxic emissions, attach a health risk assessment and receptor modeling data.

14. Can you monitor or quantify emission levels from the subject equipment or activity during the variance period and make such records available to the District? Source tests, engineering tests, or portable emission analyzers can be utilized.
Yes: ☐ No: ☒ Provide an explanation of your response.

Darling does not own continuous or portable emissions analyzers and the emergency nature of the project meant that there was not enough time to arrange third-party testing.

15. How do you intend to achieve compliance with the rules or permit conditions? Include a detailed description of any equipment to be installed and/or modifications to be made, a listing of the dates by which the actions will be completed, and an estimate of the total cost, if available.

Darling believes that compliance will be immediately achieved upon restarting the RTO once the media installation is complete. The estimated cost of the repair is \$330,000 and is expected to take place between April 11-14, 2026 with the unit shutdown on April 10, 2026 to cool down.

16. State the dates you are requesting the variance to begin and end (the end date should be the date you expect to achieve compliance with the rules, regulations, and permit conditions). Please overestimate the time needed to allow for any contingencies.

Begin variance: April 10, 2026 End variance: April 14, 2026

17. Please state if you need special time designations. For example: "*We need 15 non-consecutive days between such and such date.*"

18. If a variance, or series of variances, is to extend beyond one year, you must attach a Schedule of Increments of Progress pursuant to Rule 5050 –*Compliance Schedule* which must specify certain dates or milestones to be met in achieving compliance.

19. List the names of any District personnel who are familiar with the facility (inspectors, permit engineers, etc.) or with whom facility representatives have had contact concerning this variance petition, or any related NOV or NTC.

Jaylenne Miramontes

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete:

Date: 3/6/2026

*Signature: Joel Lunsford

Digitally signed by Joel Lunsford
Date: 2026.03.03 15:53:26 -06'00'

Title: Manager of Environmental Affairs

Print Name: Joel Lunsford

**must be signed by a responsible official if petitioner is a Title V source*

The original petition in this format, and any attachments must be submitted to the District. Any attachments that are extraordinarily difficult to reproduce, such as full color photographs, must be submitted as six copies. Petitions which are incomplete, illegible, submitted in the wrong format, or without the necessary filing fee will be returned. If you need assistance completing this petition and/or developing a compliance schedule, contact the Compliance Department in your region.

Northern Region Office
(209) 557-6440

Central Region Office
(559) 230-5950

Southern Region Office
(661) 392-5540

You may hand deliver, mail, or email this petition to variance@valleyair.org