



EPA Proposes Emission Controls for Feed Manufacturers Using Chromium, Manganese

The U.S. Environmental Protection Agency (EPA) on July 27 published a proposed rule that would require many animal feed manufacturing facilities to implement specified management practices and standards to minimize emissions of chromium compounds and manganese compounds if such products are used within their operations.

In the *Federal Register* notice announcing the proposed rule, EPA stated the new requirements were issued to comply with provisions of the Clean Air Act that require the agency to identify and implement standards for at least 30 hazardous air pollutants that pose the greatest threat to public health in the largest number of urban areas. EPA also stated that it proposed the rule now in response to a court-ordered deadline that requires the agency to issue standards for the animal feed manufacturing emission source category by Aug. 17.

The agency provided only a 30-day comment period – ending on Aug. 26 – on the proposed rule, unless a public hearing is requested by Aug. 6. If such a hearing is requested, the agency stated that it will extend the comment period until Sept. 10. The NGFA will be evaluating the merits of requesting a public hearing.

The provisions within the proposed rule would apply to all animal feed manufacturing facilities – except for manufacturers of dog and cat food and defined research and laboratory facilities – that use chromium compounds or manganese compounds. Among other things, the proposed rule would require affected facilities to:

- ▶ Perform housekeeping measures to minimize excessive dust, including at least monthly removing dust from walls, ledges and equipment using low-pressure air or by other means, and sweeping or vacuuming the area.
- ▶ Use filter drop socks at the end of the loading discharge points during the bulk-loading process to minimize

potential dust emissions. Facilities also would be required to inspect such filter drop socks monthly to ensure their proper working operation.

- ▶ Capture emissions from pelleting operations – if the facility’s daily mixing production rate averages more than 50 tons per day – and route them to a cyclone designed to reduce emissions of particulate matter less than 10 microns in diameter by at least 95 percent. Affected facilities also would be required to operate and maintain the cyclone in accordance with manufacturer’s specifications, conduct monthly cyclone inspections and monitor the unit’s pressure drop at least daily.
- ▶ Submit a notification of compliance status report to EPA within a specified time frame stating whether the facility has complied with all the relevant standards and other requirements of the rule, and the pressure-drop range that constitutes proper operation of the pellet cyclone, if applicable.
- ▶ Submit a certification report to EPA by March 15 of each year providing information about the facility’s compliance with the rule during the previous calendar year.
- ▶ Maintain copies of all required reports and records for five years following the date of each recorded action. EPA proposed that facilities maintain the records onsite for at least two years, but then have the option to keep the records offsite for the remaining three years.

Members receiving the *NGFA Newsletter* electronically may access the proposed rule by [clicking here](#).

The NGFA’s Feed Manufacturing and Technology Committee and the NGFA/GEAPS Safety, Health and Environmental Quality Committee will be reviewing the EPA proposed rule, and will submit comments to the agency by the appropriate deadline.

