

**SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT
NORTHERN REGION
4800 Enterprise Way
Modesto, California 95356
(209) 557-6400**

STAFF REPORT

April 8, 2026

SHORT VARIANCE

DOCKET No. N-26-04S

FACILITY: Darling Ingredients Turlock
PO Box 1608
Turlock, CA 95131

LOCATION: 11946 Carpenter Road
Crows Landing, CA 95381

RULE VIOLATION: 2010 – *Permits Required*
2070 – *Operation According to the Permit to Operate Conditions*
2201 – *New and Modified Stationary Source Review Rule*
2520 – *Federally Mandated Operating Permits*
4104 – *Reduction of Animal Matter*

PERMIT NUMBERS: N-2107-0-5 and -9-21

EPA AIRS NUMBER: 06-099-N2107

NOV NUMBER: N/A

TYPE OF BUSINESS: Rendering Facility

NATURE OF THE PROBLEM:

Darling Ingredients Turlock (DARLING) is a global developer and producer of sustainable natural ingredients from edible and inedible bio-nutrients, creating a wide range of ingredients and customized specialty solutions for customers in the food, pet food, pharmaceutical, feed, fuel, bioenergy, and fertilizer industries. DARLING is a critical service provider to regional food processing industries including slaughter, livestock, dairy, restaurant, grocer, and other related operations.

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 and the RTO is fired on natural gas to temperatures in excess of 1,400 degrees F for complete thermal destruction. That thermal destruction relies on ceramic media beds that provide a retention time that ensures complete combustion. DARLING has recently discovered excessive damage to the ceramic media and it requires

immediate replacement. The process to replace that media and return the RTO to full compliance is expected to take five days, which is longer than they can be shutdown without doing harm to the business or the community they service.

PETITIONER'S REQUEST:

DARLING has requested a short variance from the applicable requirements of District Rules 2010, 2070, 2201, 2520, and 4104 in addition to the applicable conditions of the subject permits. The requested short variance would be from April 10, 2026, to April 14, 2026, inclusive. If granted, the variance would allow for the rendering process to occur without the RTO online.

EXCESS EMISSIONS:

There will be no excess emissions of NO_x, SO_x, and CO because they are a byproduct of combustion when the RTO is operating. DARLING has estimated that excess VOC emissions may be as high as **720 pounds** during the variance period.

The District finds the estimate to be an adequate approximation for variance purposes.

IMMEDIATE COMPLIANCE:

DARLING is currently in compliance.

COMMENTS ON REQUIRED FINDINGS:

1. ***That the petitioner for a variance is, or will be, in violation of Section 41701 or of any rule, regulation, or order of the District.***

Operation of the rendering process while the RTO is shut down will violate applicable requirements of District Rules 2070, 2201, 2520, 4104 and applicable conditions of the subject permits.

2. ***That, due to conditions beyond the reasonable control of the petitioner, requiring compliance would result in either (1) an arbitrary or unreasonable taking of property, or (2) the practical closing and elimination of a lawful business.***

It would be unreasonable to require DARLING to shut down until the RTO is repaired because a large volume of the products processed at the facility are animal mortalities. These animals are required to be rendered and are restricted from going to landfills. If DARLING is required to shut down, they face a possible breach of contracts and hardship on customers. In addition, there is the potential for the byproducts to be mis-managed in ways that could impact public health and the environment.

3. *That the closing or taking would be without a corresponding benefit in reducing air contaminants.*

A closing or taking would not result in a corresponding benefit to air quality based on the short duration of the proposed RTO shutdown. When the RTO is shutdown, air contaminants from the byproducts of combustion will not be emitted. That means NO_x, SO_x, and CO will not be generated. The closing or taking would cause the loss of revenue and breach of contract. Most importantly, a closing or taking would leave a void for the disposal of material, which needs to be disposed of quickly.

4. *That the applicant for the variance has given consideration to curtailing operations of the source in lieu of obtaining a variance.*

DARLING will conduct the proposed work during the weekend of April 11-12, 2026. During this time, DARLING will not receive raw material, thus minimizing the time the facility will be out of compliance.

5. *During the period the variance is in effect, that the applicant will reduce excess emissions to the maximum extent feasible.*

As stated in Finding 4, DARLING will conduct the proposed work during the weekend of April 11-12, 2026. During this time, DARLING will not receive raw material, thus minimizing the time the facility will be out of compliance, and as a result, limit the amount of excess VOC emissions.

6. *During the period the variance is in effect, that the applicant will monitor or otherwise quantify emission levels from the source, if requested to do so by the District and report these emissions levels to the District pursuant to a schedule established by the District.*

DARLING will keep records of how long the rendering process operates without the RTO in operation. They can use this to calculate the amount of excess emissions, which will be reported to the District at the conclusion of the variance.

GENERAL COMMENTS:

A nuisance as defined in District Rule 4102 is not expected to occur as a result of this variance. Nor would continued operation likely create an immediate threat or hazard to public health or safety.

It should be noted that the US Environmental Protection Agency (EPA) which monitors major sources might not recognize this variance, should it be granted. DARLING should be aware that the EPA could take enforcement action on this matter if it deems such action is appropriate.

RECOMMENDATIONS:

Should the Northern Region Hearing Board make the required findings and move to grant a short variance to DARLING, the District would recommend the following conditions:

1. The variance shall be effective from April 10, 2026, to April 14, 2026, or until the RTO is repaired and returned to compliant operation, whichever occurs first.
2. Relief shall be granted from the applicable requirements of District Rules 2010, 2070, 2201, 2520, and 4104 in addition to the following:
 - A. Condition 5 of N-2107-0-5 and
 - B. Conditions 9 and 26 of N-2107-9-21.
3. The variance shall allow the rendering process to occur without the RTO online while maintenance is being conducted on the RTO.
4. At the conclusion of this variance DARLING must be in compliance with all their permit conditions and applicable District Rules. If DARLING will not achieve compliance prior to conclusion of this variance, they must contact the District as soon as possible and before the variance period ends.
5. Excess VOC emissions shall not exceed **720 pounds** over the duration of the variance period.
6. Should the facility experience operational conditions likely to cause a public nuisance, DARLING shall cease operations causing the problems and take all necessary actions to abate the problem immediately.
7. A Federal Title V deviation report shall be submitted to the District within 10 days each time a Federal Title V permit condition is violated. It should be noted that multiple deviation reports may need to be submitted during this variance period. The deviation report must be sent to the facility inspector.
8. By April 29, 2026, or no later than 15 calendar days after the RTO is returned to compliant operation, whichever occurs first, DARLING shall submit to the District a written report. If the report due date should fall on a day the District is closed, it shall be due the next business day. The report shall include the following:
 - A. A summary of the activities conducted during the variance period,
 - B. The date(s), time(s), and total duration that the RTO was shut down during the variance period while material was being processed,
 - C. A calculation of the excess emissions that occurred during the variance period, and
 - D. The required certification of truth, accuracy, and completeness, signed by the designated responsible official of the Corporation, as required by Sections 9.13.1 and 10.0 of District Rule 2520 – *Federally Mandated Operating Permits*.

9. The end of variance summary report shall be submitted to the attention of:

Chris Kalashian
SJVAPCD, Compliance Department
1990 E. Gettysburg Avenue
Fresno, CA 93726
Telephone: (559) 230-5963
E-mail: chris.kalashian@valleyair.org

10. Failure to comply with any condition of this variance may render the variance null and void with the possibility of enforcement action taken that may include monetary penalties.