

Air Enforcement/Citizen Suit Action: Food & Water Watch Notice of Intent to Sue Greeley, Colorado Beef Processing Facility



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10/04/2019

Food & Water Watch, Center for Biological Diversity, and Public Justice (collectively, “Food & Water Watch”) transmitted an October 1st Notice of Intent to Sue (“Notice”) to JBS-Swift Beef Company and JBS USA alleging violations of the Clean Air Act.

The alleged violations are stated to relate to a cattle slaughter and beef processing facility in Greeley, Colorado, known as the Greeley integrated Rendering Plant (“Plant”).

The Plant is stated to operate under an Air Permit issued by the Colorado Department of Public Health and Environment. The Air Permit is denominated 95WE757. Further, the Air Permit is stated to encompass several emission points at the plant.

The Notice references the addition of a salt evaporator to the Air Permit as a new emission point. The salt evaporator is stated to have been acquired to address a wastewater issue associated with processing of hides. It is stated to include a natural-gas burner and utilize a heating process to evaporate liquid within a tank while the salt precipitates out.

The evaporator’s Air Permit is stated to address NOx and CO emissions from the fuel combustion process. NOx and CO emissions were stated to have been initially calculated using AP-42 emission factors for small boilers. However, in issuing the Air Permit modification NOx and CO limits were stated to have been foregone because they did not cause the Plant to exceed relevant thresholds. A wet scrubber was subsequently purchased because of concerns regarding particulate matter emissions according to the Notice.

The Notice alleges the following Clean Air Act violations:

1. Notice of Startup
2. Initial Compliance Testing
3. Operating and Maintenance Plan Development
4. Salt Evaporator Specifications
5. Self Certification
6. Fuel Consumption Limits

7. Emission Limits

A copy of the Notice can be downloaded [here](#).