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8 **BEFORE THE HEARING BOARD OF THE**  
9 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

10  
11 **In The Matter Of**

12 SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT,

13  
14 Petitioner,

15 vs.

16 BAKER COMMODITIES INC.,

17 [Facility ID No. 800016]

18 Respondent.

Case No. 6223-1

**DECLARATION OF PAOLO  
LONGONI IN SUPPORT OF SOUTH  
COAST AIR QUALITY  
MANAGEMENT DISTRICT'S  
PROPOSED FINDINGS AND  
DECISION IN RESPONSE TO BAKER  
COMMODITIES INC.'S SECOND  
REQUEST TO MODIFY THE ORDER  
FOR ABATEMENT**

Date: May 29, 2024  
Time: 9:30 am  
Place: Hearing Board  
South Coast Air Quality  
Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

1 **DECLARATION OF PAOLO LONGONI**

2 I, PAOLO LONGONI, hereby declare as follows:

3 1. I have personal knowledge of the facts set forth herein, except as to those stated on  
4 information and belief and, as to those, I am informed and believe them to be true. If called as a  
5 witness, I could and would competently testify to the matters stated herein.

6 2. I am an Air Quality Inspector III at the South Coast Air Quality Management  
7 District (“South Coast AQMD” or “District”). Since 2015, I have inspected rendering facilities  
8 within the South Coast AQMD’s jurisdiction, including Baker Commodities, Inc.’s (“Baker”)  
9 facility located in Vernon, California.

10 3. I have inspected Baker’s facility several times, with the most recent being on May  
11 21, 2024.

12 4. I have reviewed odor complaint records related to concerns within the City of  
13 Vernon for the time period of February 5, 2021, to May 22, 2024, and I am prepared to testify to as  
14 to those records if the Hearing Board has any questions.

15 5. I am familiar with and have reviewed Baker Commodities Inc.’s (“Respondent”)  
16 Request for Modification of an Existing Order for Abatement filed in Case no 6223-1 (“Second  
17 Request to Modify OA”). I am also familiar with the District’s June 2022 Petition for Order for  
18 Abatement, the September 2022 Order for Abatement, and the Modified Order for Abatement  
19 decided on April 19, 2023, with a written decision issued on June 21, 2023.

20 **Concerns with Baker’s Proposed Order**

21 6. I reviewed the proposed operating conditions related to Baker’s Second Request to  
22 Modify OA, and I have concerns with the proposed OA conditions not having any limitations on  
23 Baker’s proposed collection services activities. Though Baker attached standard operating  
24 procedures (“SOPs”) to their request, they are not incorporated in the conditions of the abatement  
25 order.

26 7. Based on the proposed order Baker submitted, there does not appear to be a limit on  
27 the amount of raw rendering materials that may be stored at Plant 1 Permanent Total Enclosure  
28 (“PTE”). I am concerned with the amount of raw rendering material Baker proposes to store in the

1 PTE because Baker is proposing 200,000 pounds maximum, but there is no enforceable condition  
2 to enforce that promise. Further, storing up to 200,0000 pounds of raw rendering material inside  
3 an uncontrolled enclosure may result in potential odors, particularly if the material is allowed to  
4 remain for many hours. Baker’s proposed conditions do not have a deadline as to when materials  
5 must be moved, e.g., by 9 p.m. each day. Further, if the material needed to be moved, it is my  
6 opinion based on my prior experience with Baker moving large amounts of raw rendering material,  
7 then removing up to 200,000 pounds could take more than 3 hours.

8 8. Based on the documents Baker submitted, it is unclear if and when the interior of  
9 the PTE would be cleaned. Per Baker’s proposed order, raw rendering material may be stored in  
10 the PTE at all times. Baker has not proposed a requirement that raw rendering materials must be  
11 completely removed from the PTE by a certain time each day. Baker’s transloading SOP allows  
12 for material to be received after hours. I have concerns that the PTE floor, pit area, and equipment  
13 that contacts the raw rendering material may not be cleaned every day. If material is allowed to  
14 keep coming into the PTE, it is unclear if cleaning is possible and when cleaning can occur.

15 9. The longer raw rendering material is left at ambient temperature, the potential for it  
16 to become more odorous is greater. Baker’s transloading SOP states that there is “No long-term  
17 storage of Hard Material.” But it does not define, what long-term storage is. Nor is the SOP  
18 enforceable by the South Coast AQMD because it is not part of Baker’s proposed Abatement  
19 Order. I understand Baker says its business practice relies on the movement of material, but  
20 Baker’s proposed order does not require the material to be cleared out by a certain time. I am  
21 concerned with potential odors if thousands of pounds of raw rendering material are allowed to be  
22 stored indefinitely in an enclosure that lacks air conditioning, is not refrigerated, is not connected  
23 to a scrubber, and is not connected to an afterburner. The PTE is only equipped with air curtains at  
24 two large rollup doors.

25 10. The potential for odors from raw rendering material that has been stored for hours  
26 in an uncontrolled environment is greater with warmer temperatures, such as those we experience  
27 during summer and fall months in Southern California.

28 11. Baker’s proposed conditions related to the Second Request to Modify OA do not

1 contain any limitations on how Baker shall operate its proposed collections services during this  
2 interim period when it is modifying its permits to conduct the collection services operations.  
3 Baker’s Exhibit B Transloading Standard Operating Procedures (“Transloading SOP”) contains  
4 operating conditions for its collections services that Baker says it will comply with, but these are  
5 not enforceable conditions because they are not part of the proposed abatement order.

6 12. The Transloading SOPs condition are inadequate to protect the public from  
7 potential odor, even if part of the Abatement Order.

8 13. The first condition in the SOP (which is not part of the abatement order and thus  
9 cannot be enforced) states, “Baker shall store a maximum of 200,000 lbs. of Hard Material in the  
10 Raw Material Enclosure prior to completion of the enclosure extension. After the enclosure  
11 extension is permitted and construction is completed, the total maximum capacity shall be 400,000  
12 lbs. No other raw material shall be stored in the Raw Material Enclosure.”

13 14. Based on my prior experience related to Baker’s compliance history with Rule 415  
14 and this Hearing Board’s findings in the September 2022 Order for Abatement, Baker would have  
15 a very difficult time moving the material quickly into trucks using a skip loader. For example,  
16 during an inspection on September 23, 2021, I observed Baker employees move what I estimate  
17 was approximately 197,000 lbs into trucks, using a loader, and it took nearly three hours to  
18 complete. During that event, the material was outside in a paved area, and it will only be more  
19 difficult and time consuming to maneuver a skip loader inside of the PTE.

20 15. If an odor event occurs at the facility, the material would not be removed in an  
21 acceptable amount of time under the current conditions (loading by skip loader and an alternative  
22 standard for the PTE).

23 16. Condition 5 of the Transloading SOPs says “No long-term storage of Hard Material  
24 shall occur at the Facility,” but that SOP would not be enforceable by South Coast AQMD, since it  
25 is not incorporated into the proposed modified order, and “long-term storage” is not defined.

26 17. Transloading SOP condition 4 is ineffectual. It says: “Baker shall typically receive  
27 Hard Material between 6 a.m. and 10 p.m. but may also receive Hard Material after hours.” The  
28 addition of “but may also receive Hard Material after hours” renders the time limitation almost

1 meaningless.

2 18. In my opinion the conditions proposed by the District for the collection services  
3 operation are necessary to minimize the risk of odor complaints.

4 19. Given my experience with the speed at which Baker can move raw rendering  
5 material, I believe that 60,000 pounds maximum in the raw materials receiving area enclosure is  
6 appropriate.

7 20. In addition, South Coast AQMD's proposed 9 p.m. requirement for all Hard  
8 Material to be removed from the enclosure would provide Baker the ability to clean inside the  
9 enclosure daily.

10 I declare under penalty of perjury under the laws of the State of California that the  
11 foregoing is true and correct.

12 Executed in Redlands, California on May 24<sup>th</sup>, 2024.

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*Paolo Longoni*  
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PAOLO LONGONI

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