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BAKER COMMODITIES INC.

10 **BEFORE THE HEARING BOARD OF THE**  
11 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

13 **In The Matter Of**

14 SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT,

15 Petitioner,

16 v.

17 BAKER COMMODITIES INC.,

18 [Facility ID No. 800016]

19 Respondent.  
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Case No. 6223-1

**OPENING BRIEF IN SUPPORT OF  
BAKER COMMODITIES, INC.'S  
REQUEST TO MODIFY  
THE ORDER FOR ABATEMENT**

Date: December 13, 2022

Time: 9:00 a.m.

Place: Hearing Board  
South Coast Air Quality  
Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

1 **I. REQUEST FOR MODIFICATION**

2 Respondent, Baker Commodities, Inc. ("Baker") requests that the Hearing Board modify  
3 the Order for Abatement dated September 30, 2022 (the "Order", attached hereto as Exhibit 1).  
4 The Order requires Baker completely shut down its facility located in the City of Vernon (the  
5 "Facility"), and that Baker comply with eight conditions of approval. The Order is premised on  
6 the South Coast Air Quality Management District's (the "District") Rule 415, which was enacted  
7 for the specific purpose of reducing odors from facilities that engage in the rendering of animal  
8 and animal parts.

9 Baker fully complied with the Order and shut down its rendering operations. (Declaration  
10 of Jason Andreoli In Support of Request to Modify the Order ("Andreoli Decl.") at ¶ 16). In  
11 addition to the rendering operation, the conditions also require Baker to shutter its separate trap  
12 grease and wastewater processing operations, and much of its used cooking oil recycling  
13 operations. (Andreoli Decl. at ¶ 16).

14 The Order and conditions interfere with Baker's ability to continue complying with its  
15 permitting obligations to other regulatory bodies, such as Los Angeles County Sanitation District.  
16 (Andreoli Decl. at ¶ 12).

17 **Baker is not seeking any modification of the Order that would allow it to restart its**  
18 **rendering operations or to have a "collection center" (as that term is defined in Rule**  
19 **415(c)(3)) located at the Facility.**

20 Instead, Baker requests that the Hearing Board exercise its authority under Health and  
21 Safety Code section 40808 to modify two conditions that prevent Baker from operating its trap  
22 grease business and greatly limits its used cooking oil operations:

- 23 • Condition 1 requires that: "Respondent shall stop receiving raw rendering materials,  
24 including trap grease [...]." (Order, Attachment A, at 1).

25 Baker seeks modification of this condition, as it necessitates the shutdown of Baker's trap  
26 grease operation. (Andreoli Decl. at ¶¶ 10-16). Baker seeks requests that the condition be  
27 modified to exclude trap grease from the prohibition imposed by Condition 1 such that the

1 language reads: Respondent shall stop receiving raw rendering materials, **excluding** trap grease  
2 [...].

- 3 • Condition 2 requires that: "Respondent shall cease all rendering and wastewater  
4 operations [...]." (Order, Attachment A, at 2).

5 Baker seeks to modify this condition to allow Baker to resume wastewater treatment  
6 operations, as a prohibition on wastewater operations necessitates the shutdown of Baker's trap  
7 grease operation, severely curtails Baker's ability to recycle used cooking oil, and interferes  
8 with Baker's ability to comply with its Permit for Industrial Wastewater Discharge from the Los  
9 Angeles County Sanitation District (the "County Discharge Permit"). (Andreoli Decl. at ¶¶ 9-  
10 16). **Baker does not seek to modify this condition to allow rendering operations or to**  
11 **operate as a "collection center".**

12 Baker also requests that the Hearing Board modify two conditions which are unclear,  
13 unnecessary, or infeasible as written:

- 14 • Condition 5 requires that: "Respondent shall wash all exposed surfaces free of animal  
15 matter, at least once each working day." (Order, Attachment A, at 5).

16 Baker seeks removal of the entire condition. There is no ongoing rendering at the site to  
17 result in exposed surfaces accumulating animal matter, and daily wash-down of equipment  
18 unnecessarily wastes water during the drought and risks violation of Baker's County Discharge  
19 Permit, unless the Facility's wastewater operations are permitted to restart. (Andreoli Decl. at ¶  
20 15).

- 21 • Condition 7, which requires that: "Before Respondent can restart operations at Plant 1,  
22 operations or equipment listed in condition 6 must be within a permanent total  
23 enclosure, or within a closed system." (Order, Attachment A, at 7).

24 Baker seeks to modify the condition to specify that the operations at Plant 1 covered under  
25 this condition are rendering operations only.

1 **II. THE ORDER HAS RESULTED IN THE SHUTDOWN OF BAKER'S**  
2 **NON-RENDERING BUSINESSES, AND HAS INTERFERED WITH ITS**  
3 **OBLIGATIONS UNDER OTHER PERMITS**

4 Prior to the Order, Baker operated three distinct businesses at the Facility:

5 a. rendering animal parts, which takes raw rendering material and cooks it to  
6 creates meat and bone meal that is used for fertilizer or animal feed, and further  
7 mechanically separates tallow from the cooked material that is used as the primary  
8 feedstock in renewable fuels. (Andreoli Decl. at ¶¶ 4-5).b. processing used cooking oil,  
9 which creates a yellow grease that is used as a feed supplement and as the primary  
10 feedstock in renewable fuels. This process does not involve the use heat and mechanical  
11 separation to convert any raw rendering materials into fat commodities or protein  
12 commodities. (Andreoli Decl. at ¶¶ 4; 8)

13 c. processing of restaurant trap grease water so that the water may be lawfully  
14 discharged to the sewer. This process does not involve the use heat and mechanical  
15 separation to convert any raw rendering materials into fat commodities or protein  
16 commodities. (Andreoli Decl. at ¶¶ 4; 7)

17 All three operations utilized the on-site wastewater treatment plant, which cleaned all on-  
18 site water before discharge in accordance with Baker's County Discharge Permit, regardless of  
19 whether the source of the wastewater was rendering operations or not. (Andreoli Decl. at ¶ 9).

20 On September 30, 2022 the Board issued the Order, premised on alleged violations of  
21 Rule 415 at the Facility. The Order includes Attachment A, which includes the Conditions for  
22 Order, including that the Baker stop receiving raw materials and trap grease 7 days after the  
23 Order, and shut down all rendering and wastewater operation 7 days after the Order. (Order,  
24 Attachment A).

25 The Order is a near complete shutdown of all operations at the Facility, not just the  
26 rendering operations, which Rule 415 regulates. (Andreoli Decl. at ¶¶ 11; 13).

27 Condition 1 requires that Baker "stop receiving raw rendering materials, including trap  
28 grease [...]." (Order, Attachment A, at 1.) This Condition prevents Baker from processing any

1 trap grease from Southern California restaurants. (Andreoli Decl. at ¶ 16).

2 Condition 2 requires that Baker cease all wastewater operations. (Order, Attachment A, at  
3 2.) The indefinite closure of the wastewater treatment system is fatal to all of Baker's operations,  
4 as all operations produce wastewater, which must be treated at its wastewater treatment plant  
5 prior to discharge into the sewer system per Baker's County Discharge Permit. Since October 7,  
6 2022, Baker has only been able to conduct a very limited cooking oil recycling operation, in  
7 which it captures all resulting wastewater on-site and transports it off-site for processing.  
8 (Andreoli Decl. at ¶¶ 10-16).

9 Condition 5 of the Order requires Baker to "wash all exposed surfaces free of animal  
10 matter, at least once each working day." (Order, Attachment A, at 5.) But, there is no "animal  
11 matter" because the Order prohibits rendering. (Andreoli Decl. at ¶¶ 9; 17).

12 Condition 7 of the Order requires enclosure of equipment listed in Condition 6 before  
13 operations can restart at Plant 1. (Order, Attachment A, at 7). Condition 7 was intended to apply  
14 only to rendering operations. But, as drafted it applies to all equipment including equipment that  
15 is not part of the rendering operations.

16 With the exception of a limited cooking oil recycling operation, Baker's Facility, including  
17 rendering, trap grease processing, and wastewater treatment has been shut down since October 7,  
18 2022, as required by the Order. (Andreoli Decl. at ¶ 16). Baker has also complied with all other  
19 conditions of the Order. (Andreoli Decl. at ¶ 17).

### 20 **III. THE HEARING BOARD HAS THE AUTHORITY TO MODIFY THE ORDER**

21 Under Health and Safety Code section 40808, the Hearing Board may modify any order  
22 for abatement so long as a public hearing on the modification or revocation is held.

### 23 **IV. RULE 415 COVERS ONLY RENDERING FACILITIES, IT DOES NOT COVER** 24 **TRAP GREASE OPERATIONS OR USED COOKING OIL OPERATIONS IN** 25 **THE ABSENCE OF RENDERING**

26 Rule 415, the stated basis for the Hearing Board's Order (*see, e.g.* Order, Findings of Fact  
27 at ¶¶ 3-7; Conclusions at ¶ 1), does not apply to Baker's used cooking oil or trap grease operations  
28 in the absence of Baker's rendering operation.

1 As the Hearing Board notes in its Order, "the purpose of Rule 415 is to reduce odors *from*  
2 *facilities rendering animals and animal parts.*" (Order, Findings of Fact at ¶ 3 (emphasis added);  
3 *see also* Rule 415, subd. (a), ("The purpose of [Rule 415] is to reduce odors from facilities  
4 rendering animals and animal parts"). Accordingly, Rule 415 explicitly applies to only "new and  
5 existing *rendering facilities* that process raw rendering materials; and wastewater associated with  
6 rendering." (Rule 415, subd. (b)). A "rendering facility" is "a facility engaged in rendering  
7 operations." (Rule 415, subd. (c) (20)). "Rendering" is specifically defined under Rule 415 as  
8 "operations and processes that convert raw rendering materials<sup>1</sup> into fat commodities and protein  
9 commodities by heat and mechanical separation." (Rule 415, subd. (c) (19)).

10 The Order cites alleged violations of Rule 415 (f) and 415 (g) as the justification for the  
11 Order. As with the rest of the Rule, both 415 (f) and 415 (g) specifically regulate the operation of  
12 "a rendering facility" only. (Rule 415, subd. (f)(1); Rule 415 subd. (g)).

13 The Rule also lists activities that are expressly exempted from Rule 415, including:

- 14 • "Facilities that process trap grease<sup>2</sup> but do not conduct inedible animal rendering  
15 operations." (Rule 415, subd. (l) (1) (C)); and
- 16 • "Processing of used cooking oil." (Rule 415, subd. (l) (9)).

17 **V. THE HEARING BOARD SHOULD MODIFY THE ORDER TO EXCLUDE**  
18 **BAKER'S TRAP GREASE AND USED COOKING OIL OPERATIONS, WHICH**  
19 **ARE SPECIFICALLY EXEMPT FROM RULE 415**

20 Given the prohibition of rendering operations at the Facility, any trap grease processing is  
21 no longer subject to Rule 415. Rule 415 does not regulate used cooking oil processing at the  
22 Facility. The Order must be modified to reflect this as the Hearing Board only has the authority  
23 to impose an order and conditions on operations that violate a rule. Health and Safety Code

24 <sup>1</sup> "Raw rendering materials are "materials introduced into the receiving area at a rendering  
25 facility, and may include animal carcasses and parts, packing house or grocery store cuttings, out-  
26 of-date products from grocery stores, blood, viscera, offal, feces and other organic matter  
27 generated by food processors. Raw rendering materials does not include used cooking oil." (Rule  
28 415, subd. (c) (17)).

<sup>2</sup> The District rule adoption process also signaled that trap grease operations are distinct from  
rendering operations, and should be treated as such. (2017 SCAQMD Staff Report for Regarding  
Rule 415, attached hereto as Exhibit 2.)

1 section 42451.)

2 As stated above, Baker fully complied with the Order and has halted all rendering  
3 activities at the Facility. (Andreoli Decl. at ¶¶ 16-17). Per the terms of the Order, specifically the  
4 portions of Condition 7 which Baker does not seek to modify, Baker cannot begin any rendering  
5 operations at the Facility without the prior approval of the Hearing Board. Therefore, so long as  
6 the Order remains in place, Baker is no longer a "rendering facility" as defined under Rule 415.

7 In the absence of Baker's rendering operations, there is no basis under Rule 415 for the  
8 Hearing Board to impose conditions on, let alone shut down, Baker's trap grease processing. The  
9 Order requirements also shut down most of Baker's used oil cooking, which is not subject to Rule  
10 415 at all.

11 Baker's operation of trap grease processing and used oil cooking in isolation cannot  
12 constitute a violation Rule 415(f) or 415(g). Neither of these processes involve the conversion of  
13 raw rendering materials into fat commodities and protein commodities by heat and mechanical  
14 separation, so neither of these operations is a sufficient basis to deem the facility a "rendering  
15 facility" subject to Rule 415(f) or 415(g). (Andreoli Decl. at ¶¶ 7-8). In fact, in the absence of a  
16 rendering operation, Baker's trap grease processing operation is explicitly exempted from Rule  
17 415. (Rule 415, subd. (l) (1) (C); (l) (9)). Baker's used cooking oil operations is not regulated  
18 irrespective of whether there is rendering on-site. This is confirmed by the number of independent  
19 trap grease hauling and processing operations in Southern California which currently operate  
20 without District regulation. (Trap Grease Hauling/ Processing Facilities, attached hereto as  
21 Exhibit 3.)

22 Accordingly, the Hearing Board should modify Condition 1, Condition 2, and Condition 7  
23 to ensure that no condition prevents Baker from restarting trap grease processing and restoring its  
24 used oil cooking to its prior level of operation. The Hearing Board can accomplish this while  
25 maintaining the portions of Condition 1, Condition 2, and Condition 7 that shut down Baker's  
26 rendering operations until such time that Hearing Board approves a restart of those operations.

1 **VI. THE HEARING BOARD SHOULD MODIFY THE ORDER TO ELIMINATE**  
2 **WASTEWATER RELATED CONDITIONS THAT ARE OVERBROAD AND**  
3 **INTERFERE WITH BAKER'S OTHER PERMIT OBLIGATIONS**

4 The Hearing Board should also modify Condition 2 and Condition 5 to ensure that Baker's  
5 on-site wastewater is handled reasonably in light of the drought and in compliance with its  
6 County Discharge Permit.

7 In the absence of any rendering operations at the Facility and the resulting lack of animal  
8 matter on rendering equipment, there is no reason for Baker to be required to "wash all exposed  
9 surfaces free of animal matter, at least once each working day." Maintaining this condition in the  
10 absence of rendering activities at the Facility is overly burdensome and an inefficient use of  
11 precious water resources.

12 Furthermore, even if Condition 5 were reasonable under the circumstances, it is  
13 undermined by the complete prohibition on wastewater treatment under Condition 2. Baker's  
14 County Discharge Permit requires that all water on Baker's property, whether it results from  
15 operations, wash-downs, or precipitation, be treated before being discharged. (Andreoli Decl. at ¶  
16 9). Condition 2 prevents Baker from operation of its on-site treatment system, leaving the  
17 surrounding community open to the risk that untreated wash-down water or rainwater may spill  
18 onto the street, go into storm drain, and be released into the ocean. (Andreoli Decl. at ¶ 12).

19 The Hearing Board should eliminate Condition 5 in light of the ongoing shut down of  
20 rendering operations at the Facility, and should modify Condition 2 to allow for Baker to resume  
21 on-site wastewater treatment as required by Baker's County Discharge Permit. The Hearing Board  
22 can accomplish this while maintaining the portions of Condition 2 that shut down Baker's  
23 rendering operations until such time that Hearing Board approves a restart of those operations.

24 **VII. CONCLUSION**

25 The Order, as currently constituted, exceeds the Hearing Board's authority under Health  
26 and Safety Code section 42451. The Order relies on the alleged violations of Rule 415 to shut  
27 down trap grease processing and used cooking oil processing that are explicitly exempted from  
28 Rule 415. Other conditions interfere with Baker's ability to comply with its County Discharge

1 Permit and are unnecessary since Baker is prohibited by the Order from operating its rendering  
2 business.

3 Pursuant to Health and Safety Code section 40808, the Hearing Board has the authority to  
4 modify its Order and eliminate or alter these conditions. Accordingly, Baker requests that the  
5 Hearing Board remove Condition 5, and modify Conditions 1, 2 and 7.

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DATED: November 29, 2022

HANSON BRIDGETT LLP

By: 

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# EXHIBIT 1

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

10 **In The Matter Of**  
11 SOUTH COAST AIR QUALITY  
12 MANAGEMENT DISTRICT,  
13 Petitioner,  
14 vs.  
15 BAKER COMMODITIES INC.,  
[Facility ID No. 800016]  
16 Respondent.  
17

Case No. **6223-1**  
**FINDINGS AND DECISION**  
Dates: September 27, 28 & 29, 2022  
Time: 9:00 am  
Place: Hearing Board  
South Coast Air Quality  
Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

18 This Petition for an Order for Abatement was heard on September 27, 28 & 29, 2022, pursuant  
19 to notice in accordance with the provisions of California Health and Safety Code §§ 40823 and  
20 42451(a) and District Rules 415, 2004, and 3002. The following members of the Hearing Board  
21 were present: Cynthia Verdugo-Peralta, Chair; Robert Pearman, Vice Chair; Micah Ali; Mohan  
22 Balagopalan; and Dr. Allan Bernstein, DPM, MBA. Petitioner, Executive Officer, was represented  
23 by Daphne Hsu, Principal Deputy District Counsel and Nicholas Dwyer, Senior Deputy District  
24 Counsel. Respondent Baker Commodities Inc. (hereinafter referred to as "Respondent" or "Baker"),  
25 located at 4020 Bandini Blvd. Vernon, CA 90058, was represented by, Alene Taber and Niran  
26 Somasundaram, of Hanson Bridgett LLP. The public was given the opportunity to testify, several  
27 times during the 3-day hearing. Evidence was received, and the matter was submitted. The Hearing  
28 Board finds and decides as follows:

**FINDINGS OF FACT**

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1. Petitioner is a body corporate and politic established and existing pursuant to California Health and Safety Code § 40000, et seq. and § 40400, et seq., and is the sole and exclusive local agency with the responsibility for comprehensive air pollution control, in the South Coast Basin.

2. Respondent operates a rendering plant facility (Facility ID No. 800016) located at 4020 Bandini Blvd. Vernon, CA 90058 (the "Facility"), within and subject to the jurisdiction of the District. Baker is a Title V and RECLAIM facility and is required to operate pursuant to all conditions specified in its permit. The facility specializes in processing waste animal material from butcher shops, markets, slaughterhouses, and oils from restaurants. Two separate rendering plants are operated at the facility. Plant 1 is the main rendering plant. It is also known as the main plant. Plant 2, also known as the J&M plant, is the back-up plant used for overflow.

3. The purpose of **Rule 415** is to reduce odors from facilities rendering animals and animal parts.

4. **Rule 415(f)(1)** requires certain rendering equipment be operated within a permanent total enclosure, or in a closed system, within 24 months after a permit to construct is issued, unless the applicant elects to show compliance pursuant to Rule 415(f)(5). If the Rule 415(f)(5) option is elected, the facility needs to show compliance, within 12 months after a permit to construct is issued. **Rule 415(f)(1)** specifies the following equipment and processes to be operated within a closed system, or a permanent total enclosure: conveyors associated with raw material transfer operations; size reduction and conveying equipment; raw rendering material cookers; and process equipment, for separating rendered fat from protein materials.

5. **Rule 415(f)(3)(B) and (C)** requires that material conveyors, troughs, bins and hoppers that are components of a closed system, "shall be completely enclosed on all sides, except for doors or panels, as well as maintenance and personnel access."

6. **Rule 415(f)(5)** requires raw materials receiving areas to be within a permanent total enclosure.

///

1           7.       **Rule 415(d)(1)(C)** requires that wastewater treatment equipment and processes be  
2 operated in a closed system, or within a permanent total enclosure, no later than 12 months after a  
3 permit to construct is issued. **Rule 415(g)** specifies the following wastewater equipment and  
4 processes to be operated within a closed system, or located within a permanent total enclosure:  
5 screens; skimmers; clarifiers, including dissolved air flotation; settling tanks; sludge dewatering  
6 equipment; sludge drying equipment; and the rendering facility treated wastewater outlet to the city  
7 sewer.

8           8.       **Rule 2004(f)(1)** requires a permit holder to “comply with all rules and permit  
9 conditions applicable to the facility . . .” **Rule 2004(f)(2)** prohibits a person from building a new  
10 source, or a modification without a Permit to Construct.

11           9.       Similarly, **Rule 3002(c)(1)** requires a person to “operate a Title V facility and all  
12 equipment located at a Title V facility, in compliance with all terms, requirements, and conditions  
13 **specified** in the Title V permit at all times.” **Rule 3002(a)** prohibits a Title V facility from building  
14 a new source, or a modification without a Permit to Construct.

15           **I. BACKGROUND**

16           10.       Residential areas most impacted by odors from rendering facilities are, but  
17 not limited to Boyle Heights, Huntington Park, Maywood, Commerce, and Bell.

18           11.       Baker has been a repeat violator of Rule 415. Before the completion deadline  
19 of the permanent total enclosures, facilities were required to store raw rendering materials  
20 in a covered container, or in a permanent total enclosure, within 4 hours after delivery.  
21 (See Rule 415(e)(5).) Baker has received six notices of violations, for violations of Rule  
22 415(e)(5), from August 2019 to January 2022.

23           **a. General Description of Processes**

24                   **i. J&M Plant**

25           12.       The facility has a raw material receiving area for each of the rendering plants  
26 and a separate butcher trimming receiving area. On April 23, 2020, Baker received a  
27 permit to construct a 4,050-square-foot enclosure for J&M Plant’s receiving area. In  
28 February 2022, Baker informed South Coast AQMD that its approved design for the J&M

1 Plant receiving area would not work. On or about March 29, 2022, Baker submitted an  
2 application to modify the permit to construct a 250-square-foot enclosure (A/N 635940).  
3 But before it received a modified permit to construct, Baker constructed the 250-square-  
4 foot enclosure, in violation of Rule 203. As of April 26, 2022, an inspection of the J&M  
5 Plant verified it is not operating.

6 **ii. Plant 1**

7 13. Other than the butcher trimmings, raw rendering materials are delivered to the  
8 facility and are placed in the Plant 1 receiving area (since it is South Coast AQMD's  
9 understanding that J&M Plant is not currently in operation). The materials are pushed into  
10 a pit with a tractor. The materials are then ground and cooked, as part of a continuous  
11 rendering process. The final product is held in silos, until placed into trucks, to be  
12 delivered to buyers.

13 14. The facility staff sprays water at the facility, including material receiving  
14 areas, and trucks, to remove blood and other debris. The water and materials are collected  
15 in drains throughout the plant, which gets pumped to the wastewater sludge tank  
16 ("Wastewater Sludge Tank"). The material is then moved/pumped via pipes, to a covered  
17 catch basin, where the equipment skims off animal parts and separates grease.

18 **b. Rule 415 Requires Enclosures or Closed Systems**

19 15. Enclosures or configuring the processes as closed systems, as required by  
20 Rule 415, also reduce potential odors. Pursuant to Rule 415, facilities have the following  
21 options (1) configuring processes as closed systems, (2) conducting operations in a  
22 permanent total enclosure, with ventilation standards set forth in Rule 415(f)(2)(B), or (3)  
23 conducting operations in a permanent total enclosure, with alternative ventilation standards  
24 (known as, an alternative PTE). While other rendering facilities, in the same area, have  
25 fully configured their processes as closed systems, or have built a permanent total  
26 enclosure, Baker has not complied and has not fully, or properly done so. This means odors  
27 are more likely to emanate from the Baker facility.

28 16. On March 10, 2020, South Coast AQMD issued permits to construct, to the

1 facility for Plant 1's operations: Plant 1's raw material receiving area and cooking and  
 2 related processes. In addition, on March 10, 2020, South Coast AQMD issued permits to  
 3 construct for the facility's wastewater and related processes, which is shared by both Plant  
 4 1 and the J&M Plant.

5 17. On April 23, 2020, South Coast AQMD issued a permit to construct, to the  
 6 facility for J&M plant's operations: J&M plant's raw material receiving area, cooking, and  
 7 related processes.

8 18. Pursuant to Rule 415, the facility sought and received one-year extensions as  
 9 shown below in the chart.

Description of Permit	Permit to Construct Issued	Deadline	Extension of Deadline
<ul style="list-style-type: none"> <li>• Plant 1 alternative PTE for the raw material receiving area.</li> <li>• Plant 1 closed system for rendering operations.</li> </ul>	March 10, 2020	March 9, 2021 (for alternative PTE)  March 9, 2022 (for closed system for rendering operations)	March 9, 2022 (for alternative PTE)
<ul style="list-style-type: none"> <li>• Wastewater operations – closed system (e.g., tanks and catch basins) and PTE with air pollution control system (e.g., dewatering press and filter press)</li> </ul>	March 10, 2020	March 9, 2021	March 9, 2022
<ul style="list-style-type: none"> <li>• J&amp;M Plant alternative PTE for raw material receiving area</li> <li>• J&amp;M Plant closed system for rendering operations</li> </ul>	April 23, 2020	April 22, 2021 (for alternative PTE)  April 22, 2022 (for closed system for rendering operations)	April 22, 2022

27 19. Baker Commodities failed to:

28 i. Properly configure, as a closed system, its rendering operations in Plant 1, by

1 March 9, 2022.

2 ii. Properly or fully enclose, or configure as a closed system, its wastewater  
3 operations, which is shared by both Plant 1 and the J&M Plant, by March 9,  
4 2022.

5 iii. Enclose its butcher trimmings receiving operations. (This has not been  
6 designated as part of Plant 1, or the J&M Plant.)

7 20. Inspector Dillon Harris, inspected the facility several times in 2022, and observed  
8 multiple violations. These violations were observed on March 11, 2022, and on follow-up  
9 inspections, including most recently on September 22, 2022, verifying that the facility continued to  
10 violate the rules, as described below.

11 **II. BAKER FAILED TO CONFIGURE AS CLOSED SYSTEM OR OPERATE  
12 WITHIN A PERMANENT TOTAL ENCLOSURE**

13 **a. Baker Violates Rule 415(g), Which Requires Wastewater Equipment and  
14 Processes to be Operated as a Closed System, or within Permanent Total  
15 Enclosure**

16 21. Rule 415(g) requires that wastewater treatment equipment and processes be operated  
17 in a closed system, or within a permanent total enclosure. Baker failed to operate the following  
18 wastewater treatment operations, shared by both Plant 1 and the J&M Plant, in a closed system, or  
19 enclose the following materials, processes, or equipment that is part of their wastewater treatment  
20 operations.

21 i. Open air pit.

22 22. The facility dumps materials from several processes (as detailed elsewhere),  
23 including from wastewater treatment, into one open-air pit ("Open-Air Pit"), located west of the  
24 silos holding the finished product, in violation of Rule 415(g). This process must be enclosed.

25 ii. Wastewater operations that are associated with grease processing.

26 23. Tanker trucks collect grease and wastewater from restaurants. The grease and  
27 wastewater from restaurants are pumped from tanker trucks into the wastewater tank, located at the  
28 facility's centralized wastewater area. This restaurant material from the wastewater tank is then  
moved, using a screw conveyor, which separates the oil, water, and sludge then unloads the sludge

1 into an open bin. This sludge is then dumped into an Open-Air Pit. The process beginning with  
2 the screw conveyor and ending with the Open-Air Pit, is in violation of Rule 415(g). This process  
3 must be enclosed.

4 24. Rule 415 has a limited exemption for “trap grease unloading operations.” It does not  
5 apply to the wastewater operations associated with trap grease unloading.

6 iii. Sludge from dewatering press

7 25. The dewatering press is located in the wastewater permanent total enclosure and  
8 serves the whole facility. Sludge from the dewatering press is deposited into an open bin, then  
9 removed from the PTE, and transported and dumped into the Open-Air Pit. The sludge handling  
10 must be done within an enclosure, at all times, per Rule 415(g).

11 iv. Materials and processes located at the J&M Plant

12 1. Centrifuge located at J&M Plant

13 26. Material from the cooking process and general wastewater, is collected in the sludge  
14 tank. Material from the sludge tank (which is located east of the J&M plant), the cooker, and other  
15 processes is processed in the J&M centrifuge, to separate sludge from the wastewater. Sludge from  
16 the centrifuge is then dumped into the Open-Air Pit. This entire process, from the centrifuge to the  
17 Open-Air Pit, must be enclosed, per Rule 415(g).

18 b. **Baker Violates Rule 415(f)(1), Which Requires Rendering Equipment to be**  
19 **Within a Permanent Total Enclosure or Closed System**

20 27. Receipt of Butcher Trimmings. Baker blatantly violates the requirement that all  
21 “conveyors associated with raw material transfer operations,” must be enclosed. See Rule  
22 415(f)(1)(A). In an area on the far west portion of the property, near the grease dock, known as the  
23 star dock, Baker’s staff empty trash cans of raw material into a hopper, which is transported via a  
24 screw conveyor and deposited into a dump truck. Typically, the truck then transports the raw  
25 material to either Plant 1, or the J&M plant receiving area for processing. At this time, the J&M  
26 plant is not in operation.

27 c. **By Not Properly Enclosing Plant 1 Equipment, Baker Violates Rule 415(f)(3),**  
28 **Which Requires Material Conveyors and Troughs to Be Enclosed on All Sides**

1           28.     Rule 415(f)(3) provides closed system standards, requiring the facility to minimize  
2 leaks and prevent odors from escaping. The facility has a continuous rendering process. In Plant 1,  
3 raw materials are transported by a conveyor and moved across a magnet (that is, dropped in a chute  
4 with a magnet on one side) to remove ferrous metal. Afterwards, a raw material grinder grinds the  
5 material to a smaller size. The ground material is conveyed into the cooker. The cooked material  
6 is then pressed. The remaining cooked solid material is dumped into a truck and sent to the silos.

7           29.     The facility collects wastewater from throughout the plant. The facility elected a  
8 closed system and a PTE for its wastewater operations but has failed to properly implement that  
9 system.

10          30.     Baker flouts Rule 415(f)(3) throughout Plant 1, by operating many of the processes  
11 designated as closed systems, with panels that are not properly sealed, or designated for  
12 maintenance access that are left open, even when no maintenance is being conducted. In addition,  
13 Baker's permitted Title V equipment requires that the "operator shall maintain all equipment in  
14 such a manner that ensures proper operation of the equipment." (See Title V Permit, Section E.2.)

15           a.     Conveyors. There are several processes in which conveyors are open, allowing  
16 odors and animal material to escape. This violates Rule 415(f)(3)(B), which  
17 states "material conveyors and troughs that are components of a closed system  
18 shall be completely enclosed on all sides, except for doors or panels for  
19 maintenance and personnel access."

20           b.     Grinders. Baker's grinders are leaking animal material. This violates Rule  
21 415(f)(3)(A), which states "each component of a closed system shall be  
22 maintained in a manner that minimizes leaks from occurring . . ."

23           c.     Access door to magnet. During multiple inspections, the access door to the  
24 magnet was observed open, even when no one is performing any maintenance.  
25 This violates Rule 415(3)(A), which states that "each component of a closed  
26 system shall be maintained in a manner that minimizes leaks from occurring and  
27 prevents odors from escaping . . ." from the system Access door always being  
28 left open.

- 1 d. Presses. The presses used to press cooked materials are not sealed and leak  
2 animal material in violation of Rule 415(f)(3)(D). Rule 415(f)(3)(D) states  
3 “mating metal surfaces on doors or access panels under this paragraph shall be  
4 sealed with gasket material.”
- 5 e. Clay Press. The clay press further removes residual solids from the tallow  
6 received from the other presses. The pressed material is then put into an open  
7 bin and dumped into the Open-Air Pit. The tallow from this press is kept.  
8 Baker is in violation because the clay press is not configured as a closed system,  
9 or not operated inside a PTE.
- 10 f. Trough outside of Plant 1. The trough on the outside of the Plant I enclosure for  
11 raw materials was initially designed to handle runoff from the materials pile  
12 before the enclosure was built. The trough is grated and open to the atmosphere.  
13 After the enclosure for raw materials was built, this trough remained outside the  
14 enclosure. The facility now has a drain from inside the enclosure that feeds  
15 blood, animal fat, animal material, and wastewater to the trough, which now sits  
16 outside the enclosure. This trough is graded in such a way that the low side is  
17 farthest away from the sump which pumps the wastewater to the wastewater  
18 treatment plant, resulting in a buildup of animal matter in this trough and  
19 potentially causing odors. Now that the enclosure is built and a closed system  
20 for wastewater is past due, this trough should not be open to the atmosphere.  
21 (See Rule 415(f)(3)(B).) By sending animal material from inside the enclosure  
22 to outside the enclosure, where it is open to the atmosphere, Baker is in  
23 violation. Its wastewater operations must be configured as a closed system, or  
24 conducted within an enclosure.

25 31. Trough leading from Open Air Pit to a sump. In, or around May 2022, a new trough  
26 was built leading from the Open-Air Pit to a sump for the wastewater operations shared by both  
27 Plant 1 and the J&M Plant. This trough, which is part of its wastewater operations, must be  
28 configured as a closed system, or conducted within an enclosure.



1 law. Nothing herein shall be deemed or construed to limit the authority of the District to issue  
2 Notices of Violation, to seek civil penalties, or injunctive relief, or to other administrative or legal  
3 relief. The Findings of Fact are based on evidence presented by Petitioner and Respondent, as of  
4 the date hereof.

5 The Hearing Board shall retain jurisdiction over this matter until September 28, 2023, or  
6 until Respondent has fully complied with the terms of this Order, whichever occurs later, unless this  
7 Order is amended and modified.

8 Good cause appearing, it is so ordered.

9  
10 BOARD MEMBER: Cynthia Verdugo-Peralta  
11 Cynthia Verdugo-Peralta, Chair

12  
13 DATED: 09/30/22

14  
15  
16 I VOTE NO: Mohan Balagopalan  
17 Mohan Balagopalan 9/30/22

18  
19 Attachment A

20 My dissenting vote are for the following reasons:  
21 I do not agree with the Petitioner allegations that the sludge handling operations and  
22 the activities at the Open-Air Pit are subject to Rule 415 (g) (5) and (g)(6). This is  
23 also the case in my opinion of the butcher trimmings operation which load the material  
24 on to a truck that is sent to the receiving area as defined in (c)(18). These  
25 processes were also not included in the Facility Permit issued July 1st 2022. They  
26 could be subject instead to Rule 402 pursuant to Rule 219 (s) (3)(B). Exhibit #4  
27 which was submitted into evidence by the Petitioner also indicated that the  
28 permanent total enclosure and odor scrubber and alternative enclosure was completed  
by 3/9/2022. The inspector also testified conveyors that were left open have been  
enclosed and the access door to the material separation equipment using magnets  
has been closed.

## Attachment A

### Conditions for Baker Commodities

1. Respondent shall stop receiving raw rendering materials, including trap grease, by 5 p.m., seven (7) days after the order is entered.
2. Respondent shall cease all rendering and wastewater operations by 5 p.m., seven (7) days after the order is entered.
3. Respondent shall remove or render all raw rendering materials by 5 p.m., seven (7) days after the order is entered.
4. Respondent shall remove all wastewater materials from the Open-Air Pit and place it into a container or containers by 5 p.m., seven (7) days after the order is entered.
5. Respondent shall wash all exposed surfaces free of animal matter, at least once each working day.
6. Respondent shall provide a written timeline within seven (7) days after the order is entered to the Clerk of the Board ([ClerkofBoard@aqmd.gov](mailto:ClerkofBoard@aqmd.gov)) and to South Coast AQMD ([dharris@aqmd.gov](mailto:dharris@aqmd.gov)), as to how it would abate the following violations:
  - a. Wastewater equipment, or operations that are not within a permanent total enclosure, or within a closed system:
    - i. Open-Air pit
    - ii. Wastewater operations that are associated with grease processing, beginning with the screw conveyor and ending with the Open-Air Pit.
    - iii. Sludge handling
    - iv. Process from centrifuge to Open-Air Pit
  - b. Rendering equipment, or operations that are not within a permanent total enclosure, or within a closed system:
    - i. Receipt of butcher trimmings
    - ii. Conveyors
    - iii. Grinders
    - iv. Access door to magnet
    - v. Presses
    - vi. Clay press
    - vii. Trough outside of Plant 1
    - viii. Trough leading from Open-Air Pit to a sump
7. Before Respondent can restart operations at Plant 1, operations or equipment listed in condition 6 must be within a permanent total enclosure, or within a closed system.
8. Respondent shall notify the Clerk of the Hearing Board ([ClerkofBoard@aqmd.gov](mailto:ClerkofBoard@aqmd.gov)) and South Coast AQMD ([dharris@aqmd.gov](mailto:dharris@aqmd.gov)), of final compliance within three (3) calendar days of achieving final compliance.

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**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF CONTRA COSTA**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Contra Costa, State of California. My business address is 1676 N. California Blvd., Suite 620, Walnut Creek, CA 94596.

On November 7, 2022, I served true copies of the following document(s) described as

- **RESPONDENT'S REQUEST TO MODIFY THE ORDER FOR ABATEMENT WITH TWO EXHIBITS ATTACHED**

on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [emaestro@hansonbridgett.com](mailto:emaestro@hansonbridgett.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on November 7, 2022, at Concord, California.



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Elaine T. Maestro

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**SERVICE LIST**

*In the Matter of SCAQMD v. Baker Commodities, Inc.*  
**Case No. 6223-1**

Nicholas Alfredo Sanchez  
Barbara Baird; Patrick Choi; Daphne Hsu;  
Nicholas Dwyer; Joyce Lledan; Bayron  
Gilchrist; Clerk of the Board  
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# EXHIBIT 2

Therefore, it is not an exhaustive representation of all of the changes to PR 415, but only the changes that may affect the environmental impact analysis in the Final EA.

**Table P-1: Summary of Major Changes to PR 415**

Areas of Changes	PR 415 (June 23, 2015 <sup>1</sup> )	PR 415 (November 3, 2017 <sup>2</sup> )
Odor Best Management Practices (BMP)	<ul style="list-style-type: none"> <li>• BMP (e)(9) Transfer of Raw or Cooked Rendering Materials between Enclosures</li> <li>• BMP (e)(11) Cleaning Floor Drains</li> </ul>	<ul style="list-style-type: none"> <li>• Limited the application of BMP (e)(9) to transfer of cooked rendering materials only at facilities with a batch cooker between permanent total enclosures while the BMP applies to transfer of raw materials at all facilities</li> <li>• Limited BMP (e)(11) Cleaning Floor Drains to remove accumulation of rendering materials<sup>3</sup> to not less frequently than once per month</li> <li>• Added an alternative BMP, provided that it meets the same odor reduction objective as the BMP it replaces</li> </ul>
Trap Grease	<ul style="list-style-type: none"> <li>• PR 415 applied to trap grease wastewater associated with trap grease processing</li> <li>• Delivery Tanker Trucks BMP</li> <li>• Venting Delivery Tanker Vehicles to Odor Control Equipment BMP</li> </ul>	<ul style="list-style-type: none"> <li>• Removed trap grease from PR 415 applicability</li> <li>• Removed the two BMPs PR 415 (e) Odor Best Management Practices</li> </ul>
Time Extension Request	<ul style="list-style-type: none"> <li>• Not included.</li> </ul>	<ul style="list-style-type: none"> <li>• Provided a one-time extension for up to one year to complete construction of a permanent total enclosure and applicable ventilation and odor control systems for situations beyond the owner or operator's control (PR 415 (d)(1)(F))</li> </ul>
Ventilation System Design Standards	<ul style="list-style-type: none"> <li>• Inward face velocity of not less than 200 feet per minute</li> </ul>	<ul style="list-style-type: none"> <li>• Lowered inward face velocity demonstration from 200 feet per minute (fpm) to 100 fpm when truck access doors are open</li> <li>• Added an alternative ventilation system design standard in lieu of inward face velocity, provided the ventilation system is greater than 15 air changes per hour</li> </ul>
Alternative Standard for the Raw Materials Receiving Area	<ul style="list-style-type: none"> <li>• Not included.</li> </ul>	<ul style="list-style-type: none"> <li>• Allowed an alternative standard for an unventilated permanent total enclosure for raw material receiving, provided that a secondary odor containment system is used at each opening for vehicles and equipment; such as air curtains, vestibules, or air lock systems to minimize fugitive odors escaping through enclosure openings (PR 415 (f)(5))</li> </ul>

# EXHIBIT 3

**Trap Grease Hauling/Processing Facilities**

Facility Name	Fac ID	Street Address	City	St	Zip	Complaints	Pumps Trap	Processes Trap	Website	Contact Phone	Source
						<5 yrs?	Grease?	Grease?			
Alpha Omega Septic Service	none	11755 Santa Fe Ave E	Hesperia	CA	92345		Yes		<a href="http://www.aoseptic.com">www.aoseptic.com</a>	(760) 248-7961	4
Baker Commodities	800016	4020 Bandini Blvd	Vernon	CA	90058			Yes		(800) 427 0696	4
Bioclear Solutions	none	2309 Torrance Blvd, Ste 104	Torrance	CA	90501				<a href="http://www.bioclearsolutions.com">www.bioclearsolutions.com</a>	(888) 433-5886	4
Chans Grease Service	none	9281 Hazard Ave	Westminster	CA	92683				<a href="http://www.greaseservice.com">www.greaseservice.com</a>	(951) 830-2172	4
Co-West Commodities	164319	1389 W Mill St	San Bernardino	CA	92408	Yes			<a href="http://co-west.com">co-west.com</a>	(909) 383-8341	1,3
Coast Packing Co	13126	3275 E Vernon Ave	Vernon	CA	90058					(323) 277-7700	3
Darling International Inc	63180	2626 E 25th St	Vernon	CA	90058						5
Dar Pro Solutions	177014	2624 S Hickory	Santa Ana	CA	92707	Yes					1,3
GeoGreen Biofuels	157699	6017 Malburg Wy	Vernon	CA	90058						5
Grease Masters/Promethean Biofuels	none	27635 Diaz Rd	Temecula	CA	92590					(951) 541-9141	4
Imperial Western Products	138325	86-600 Ave. 54	Coachella	CA	92236		Yes		<a href="http://www.imperialwesternproducts.com">www.imperialwesternproducts.com</a>	(800) 975-6677	2
Inland Pumping Co	none	3152 Sunset Ct	Corona	CA	92860					(951) 734-8816	2
J.C.'s Grease Buyer	135825	1999 Roberta St	Riverside	CA	92507	Yes				(951) 736-1198	1,2,3
JN Grease Service	122334	25685 Sherman Rd	Romoland	CA	92585				<a href="http://www.jngrease.com">www.jngrease.com</a>	(951) 343-1221	1,2,3
JN Grease Service	none	6227 Rutland Ave	Riverside	CA	92503				<a href="http://www.jngrease.com">www.jngrease.com</a>	(951) 343-1221	2,3
JR Grease Trap Corp	none	7741 Granada Dr	Buena Park	CA	90621					(714) 739-4628	5
JR Grease Traps and Interceptor Service	none	5608 E Washington	Los Angeles	CA	90040				<a href="http://www.greaseservices.com">www.greaseservices.com</a>	(323) 997-9602	4
LSW Enterprises, LLC	none	1215 N Grove St	Anaheim	CA	92806	No			<a href="http://www.grandnaturalinc.com">www.grandnaturalinc.com</a>	(855) 519-5550	1,3,4
One More Time/Baker Commodities	800016	4144 Bandini Blvd	Vernon	CA	90058				<a href="http://bakercommodities.com">bakercommodities.com</a>	(323) 268-2801	4
Sanco Pumping Service	none	2502 E Morongo Trl	Palm Springs	CA	92264					(760) 327-8859	2
SMC Grease Specialist	177783	1600 Pellisier Rd	Colton	CA	92324	Yes			<a href="http://www.smcgrease.com">www.smcgrease.com</a>	(951) 788-6042	1,2,3,4
SoCal Pumping Co	none	5975 Jasmine St	Riverside	CA	92504	No					1,3
Southwest Processors Inc	4138	4120 Bandini Blvd	Vernon	CA	90058	Unk			<a href="http://www.southwesttreatment.com">www.southwesttreatment.com</a>	(213) 261-0935	1,3
SoCal Biofuel	none	1006 E South St	Anaheim	CA	92805					(888) 888-4121	4
Urbanx Renewables Group, Inc	none	1571 W 15th St	Long Beach	CA	90813	Yes				(888) 755-8974	1,3
Valley Wide Pumping	none	68075 Concepcion Rd	Cathedral City	CA	92234					(760) 322-2400	2
White Houst Sanitation	none	9016 Norwalk Blvd	Santa Fe Springs	CA	90670				<a href="http://www.whitehousesanitation.com">www.whitehousesanitation.com</a>	(888) 400-4330	2
Wright Septic Tank Service	153687	P.O. Box 1196	San Jacinto	CA	92581				<a href="http://www.wrightseptic.com/">http://www.wrightseptic.com/</a>	(800) 490-3320	4
WRT Indio, LLC	102313	62-150 Gene Welmas Rd	Mecca	CA	92254	Yes			<a href="http://wei-mecca.com">wei-mecca.com</a>	(760) 396-0222	1,3

**Source**

<sup>1</sup> [apps4.cdfa.ca.gov/ikg/Transporters.aspx](http://apps4.cdfa.ca.gov/ikg/Transporters.aspx)

<sup>2</sup> [http://www.rivcowm.org/opencms/landfill\\_info/pdf/FactSheets/70756-GreaseandGreaseTrapWaste.pdf](http://www.rivcowm.org/opencms/landfill_info/pdf/FactSheets/70756-GreaseandGreaseTrapWaste.pdf)

<sup>3</sup> <https://www.google.com/maps/d/viewer?mid=zNEB8UfZ6vP0.k3DZiFr9uxLU&msa=0&ll=33.655781,-116.864319&spn=1.591171,3.348083> (Cher Snyder provided)

<sup>4</sup> <http://www.calfog.org/Hauler.html>

<sup>5</sup> Web search