

July 5, 2022

SUBMITTED VIA ELECTRONIC MAIL



South Coast Air Quality Management District
Hearing Board
21865 Copley Drive
Diamond Bar, CA 91765
clerkofboard@aqmd.gov

Re: Letter in Support of South Coast Air Quality Management District's Petition for Order of Abatement, In the Matter of South Coast Air Quality Management District vs. Baker Commodities Inc., [Facility ID No. 800016] (Case No. 6223-1)

Pursuant to Health and Safety Code section 40828(a), Communities for a Better Environment (hereinafter referred to as "CBE") submits this letter in support of South Coast Air Quality Management District's (hereinafter referred to as "District" or "South Coast AQMD") petition to the Hearing Board for an Order of Abatement directed at Respondent Baker Commodities Inc. (hereinafter referred to as "Baker") located at 4020 Bandini Blvd., Vernon, CA 90058.

CBE is a California non-profit environmental health and justice organization. Since 1978, CBE has been organizing residents in frontline communities around environmental, racial, and social justice. CBE has adult and youth members from Southeast Los Angeles, including the Cities of Huntington Park, Maywood, and Bell, who live in close vicinity to Baker. Not only are these densely populated communities heavily impacted by Baker's operations, but these operations also occur alongside numerous other cumulative sources of pollution, including railyards and locomotives, metal processing facilities, truck diesel emissions, and toxic contamination from the former Exide facility, exacerbating health and safety risks for our members.

Rendering facilities release noxious odors comprised of volatile organic compounds ("VOCs").¹ These odors cause many health issues, including headaches, coughing, hoarseness and sore throat, burning eyes, runny nose, nasal congestion, nausea, chest tightness, shortness of breath, wheezing, heart palpitations, drowsiness, depression, and eye, nose, and throat irritation.² Young children, the elderly, and pregnant women may be

¹ South Coast Air Quality Management District, Southeast Los Angeles—Final Community Emissions Reduction Plan Appendix 5-16. <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/southeast-los-angeles/final-cerp/final-cerp.pdf?sfvrsn=9>; South Coast Air Quality Management District, AB 617 Community Air Monitoring Plan (CAMP) for the Southeast Los Angeles Community, http://www.aqmd.gov/docs/default-source/ab-617-ab-134/camps/sela/sela-camp_10-28-2020_draft.pdf?sfvrsn=4.

² CERP Appendix 5-14; AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY, *Environmental Odors: Frequency Asked Questions*, <https://www.atsdr.cdc.gov/odors/faqs.html>.

more sensitive to the impacts of odors.³ Environmental odors also exacerbate respiratory conditions, such as asthma, chronic obstructive pulmonary disease (“COPD”), or emphysema, all of which are common in Southeast Los Angeles due to its poor air quality.⁴

These health impacts are compounded by the loss in quality of life that residents experience from Baker’s operations. Residents are forced to remain indoors and keep their windows closed to try to reduce their exposure to these odors—efforts which are ultimately unsuccessful. Children, youth, and adults must also forego playing outside, exercising, and engaging in simple daily activities during odor events. These smells also impact students’ ability to learn and exercise during Physical Education instruction at Huntington Park High School and other schools in the vicinity.⁵ It is precisely for these reasons that the AB 617 Southeast Los Angeles Community Steering Committee prioritized rendering facilities as a top air quality concern and has continued to raise concerns about Baker’s violations.

The Hearing Board’s decision will directly affect residents’ ability to live, work, learn, and play in their communities. Baker’s ongoing violations threaten residents’ health and safety, as well as disrupt the peaceful enjoyment of their homes and their ability to learn. The Hearing Board is fully within its legal authority to require Baker to comply with Rule 415, Rule 2004, and Rule 3002. The Order for Abatement would also provide corresponding benefits to reducing air contaminants in our communities. Since its adoption in 2017, Baker has received six Notices of Violation (“NOVs”) under Rule 415—the most violations out of all rendering facilities in the area. Baker has also received eight additional NOVs for violating other administrative rules.⁶ These repeated violations are a clear sign that Baker refuses to be a good neighbor in our community and warrants additional oversight from the Hearing Board.

For generations, our communities have been forced to endure the nauseating smells from Baker. Our communities deserve, and are entitled, to live and go outside without being met with Baker’s foul odors. Therefore, we strongly urge the Hearing Board to grant the District’s Petition for Order for Abatement.

Sincerely,

Communities for a Better Environment

³ *Id.*

⁴ *Id.*

⁵ Laura Tejeda, *Slaughterhouses and Burning Corpses? Examining Why East and Southeast L.A. Often Smells So Bad*, L.A. TACO, <https://www.lataco.com/smell-bad-souteast-la-east/>.

⁶ South Coast Air Quality Management District, Rendering Plants in Vernon, <http://www.aqmd.gov/home/news-events/community-investigations/rendering-plants>.