



South Coast
AQMD

South Coast Air Quality Management District

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July 17, 2026

(sent via email to: glehmkuhl@onelineage.com and ddicarlo@onelineage.com)

Greg Lehmkuhl
President and CEO
Dominic DiCarlo
Vice President, Global Safety & Compliance
Lineage, Inc.
46500 Humboldt Drive
Novi, MI 48377

Re: Demand for Immediate Odor Mitigation

Dear Mr. Lehmkuhl and Mr. DiCarlo,

The South Coast AQMD has serious concerns regarding the ongoing air quality issues impacting the community surrounding the Lineage warehouse in Boyle Heights. This past week alone, our agency has responded to over 900 odor complaints, resulting in multiple enforcement actions alleging public nuisance.

The South Coast AQMD's foremost responsibility is to protect public health through ensuring compliance with air quality regulations. While our agency recognizes Lineage is implementing its Odor Management Plan dated July 12, 2026, included as Attachment 1, throughout the clean-up efforts, the significant increase in community complaints and resulting violations demonstrate that a more robust approach is necessary. The surrounding community deserves meaningful and measurable improvements without delay.

Today, a South Coast AQMD senior team visited the Lineage warehouse and met with representatives from Lineage, Clean Harbors Environmental Services, and Onterris to better understand odor mitigation measures that are being implemented. Accordingly, the South Coast AQMD has identified additional measures to address ongoing nuisance concerns. Specifically, we urge Lineage to immediately implement the measures outlined in Attachment 2. South Coast AQMD understands the clean-up is dynamic as work is being done in Buildings 1 and 2. We also recognize the measures may need to be modified over the duration of the clean-up and want to work with Lineage to ensure odors impacting the community are minimized and public health is protected.

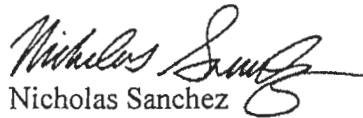
By no later than Tuesday July 21, 2026, please provide a written response detailing Lineage's progress or completion of each proposed measure.

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To further ensure the effective and enforceable implementation of these measures, the South Coast AQMD intends to file an Order for Abatement with the South Coast AQMD's independent Hearing Board. The Hearing Board will provide a public forum to guarantee greater transparency throughout this process. The South Coast AQMD remains committed to working collaboratively with Lineage, and we will pursue all appropriate enforcement remedies available under our legal authority to ensure compliance and protect public health.

The South Coast AQMD appreciates Lineage's willingness to invest resources toward addressing these concerns, and we look forward to your response and continued cooperation.

Sincerely,



Nicholas Sanchez
Assistant Chief Deputy Counsel

Attachments

cc: Helen Avunjian Kassan, Lineage Assistant General Counsel

Wayne Nastri, South Coast AQMD Executive Officer
Bayron Gilchrist, South Coast AQMD General Counsel
Susan Nakamura, South Coast AQMD Chief Operating Officer
Jason Aspell, South Coast AQMD Deputy Executive Officer
Terrence Mann, South Coast AQMD Deputy Executive Officer
Victor Yip, South Coast AQMD Assistant Deputy Executive Officer
Jason Low, South Coast AQMD Deputy Executive Officer
Stephen Dutz, South Coast AQMD Assistant Deputy Executive Officer

Attachment 1

Lineage Odor Management Plan V1.2

**Effective July 12, 2026
[See Exhibit 2]**

Attachment 2

Additional Measures in Lineage Logistics Odor Management Plan

1. Background

- a. Building 1: Building generally intact, no refrigeration, full of food (mainly meat and seafood)
- b. Building 2: Fire damaged, wall on Indiana is the working face

2. General Measures for Buildings 1 and 2

a. Misting System

- i. Existing Measure: Continue implementing misting measures in Odor Management Plan.

b. Wind Break Plan on Indiana Street

- i. New Measure:
 1. Submit a Wind Break Plan to minimize wind tunnel effects on Indiana Street to minimize impacts to downwind receptors while waste is being live loaded on Indiana Street and while any odor generating activities occur in Building 2.
 2. Install a wind monitoring station to develop work stoppage criteria.

c. Loading of Trucks

i. Existing Measures:

1. Conduct live loading of trucks as specified in Odor Management Plan.
2. Line roll-offs/trucks to prevent spillage onto pad/streets as specified in Odor Management Plan.

ii. New Measures:

1. Apply odor neutralizer prior to and during loading, including during excavation of the waste material.
2. Minimize drop height of decomposing food and waste from the loader bucket to the truck.
3. Load trucks as close to the building as safely and reasonably possible.
4. Cover each truck with either a solid covering or a vinyl tarp or the equivalent. If a vinyl tarp or the equivalent is used, operator shall use an odor containment material such as Rusmar on the decomposing food and waste.
5. Solid covering of trucks shall be used for:
 - a. Particularly odorous loads;
 - b. Loads that will be stored for 8 hours or more at or near the site;

6. Operator shall specify a timeframe to completely cover a loaded truck; and
7. Operator shall specify a timeframe to apply Rusmar.

d. Loaded Trucks (New Measures)

- i. Any loaded truck that will be sitting at or near the property for 8 or more hours, shall be covered with a solid cover and sealed to minimize the potential for odors.
- ii. A canopy or shade cover shall be placed over any loaded truck that will be sitting for more than 12 hours.

e. Housekeeping

i. Existing Measures:

1. Continue daily washing of areas using the methods specified in the Odor Management Plan.
2. Inspect the waste staging area daily, pursuant to the Waste Management Plan to ensure:
 - a. Roll-offs/trucks are kept tightly covered when not being loaded; and
 - b. Roll-offs/trucks are not leaking materials onto the pad or street (from Odor Management Plan).

ii. New Measures

1. Daily washing includes any areas with runoff, not just runoff that seeped into onsite drainage system.
2. Daily washing where there is any track out or runoff, or openings such on Indiana St.
3. Daily washing of any loading areas that are outside of the building and any equipment operated in the building that will remain outside of the building.
4. Do not allow liquids from materials or clean-up materials to pool and create odors. Use power washing devices and heated water, if possible.
5. Empty and wash drains used to collect runoff once per day.
6. Conduct daily mobile wet scrubber sweeping, a quarter mile or to the first major street from the facility, on any street(s) where loaded trucks are traversing.

f. Encapsulation and Control of Odorous Waste

i. New Measures

1. Apply odor encapsulant material (e.g. Posi-Lock) via appropriate spray or hydroseeding equipment to odorous waste material, to create a physical crust over the waste surface to prevent odor migration.

2. Prior to or via the odor encapsulant material application, apply odor neutralizer to the odorous waste material to ensure that odors are neutralized while they are encapsulated to further reduce odor migration.
3. Incorporate routine odor surveillance and visual inspection of the encapsulant material on a regular basis (e.g. weekly) to determine the condition of the encapsulant material. If cracks, separation, or other degradation of the encapsulant material is identified, additional encapsulant material or other vapor barrier material shall be applied to the degraded areas of encapsulant material as soon as possible to mitigate odor migration.
4. As encapsulated waste material is excavated for removal, encapsulant material shall be applied to or on top of the remaining exposed waste material when excavation has ceased for the day.

g. Signage (New Measure)

- i. Install signs stating, "TO REPORT AIR QUALITY ISSUES SUCH AS ODORS, DUST, OR SMOKE FROM THIS FACILITY, CALL THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT AT 1-800-CUT-SMOG".
 1. Install signs within 50 feet of the main entrance of the facility and in a location on each side of the facility that is visible to the public;
 2. Sign shall measure at least 16 square feet; and
 3. Lettering at least 3 inches tall with text contrasting with the sign background.

h. Community Communication Plan (New Measures)

- i. Develop a plan to communicate to the public the status and anticipated activities that provides:
 1. Truck routes
 2. Status updates
 3. Anticipated work that may significantly result in odor nuisance
 4. Include an onsite environmental coordinator that is responsible for:
 - a. Conducting odor surveillance around the perimeter of the facility at least three times per day;
 - b. Ensuring measures in the Odor Management Plan are implemented; and
 - c. Answering community concerns
- ii. Notify the community if any of the following occurs:
 1. Wall between Building 1 and 2 is opened;
 2. Opening of plastic covering on Union Pacific or Indiana is needed while decomposing food or waste is being moved;
 3. Accidental collapse of building structure; or

4. Significant spills of odorous materials or wastewater.

3. Measures Specific to Building 1 (New Measures)

- a. Before any decomposing food or waste is moved out of Building 1, wrap decomposing food or waste, or place in a sealed containment within the building.
 - i. Utilize temporary, enclosed vestibules vented to air pollution control equipment if materials are brought out of Building 1 before being placed in containment.
- b. Submit a detailed Odor Management Plan for how waste will be removed from Building 1 that includes the phases, staging of materials, how materials will be loaded on trucks, housekeeping, and timeframe.
- c. The middle wall between Building 1 and 2 has a significant opening from the fire damage. The Granular Activated Carbon (GAC) Units will only control emissions that are collected by the ventilation system. Significant emissions of ammonia and VOC from the decomposition of organic materials are expected to escape the intended enclosure with the current configuration. Conduct smoke tests to demonstrate inward airflow for the Building 1 opening (including opening(s) at the roof). Perform the smoke test during daytime high temperatures. Subsequent to the smoke test, plastic sheeting shall be used to close any openings that indicated outward air flow from the structure. Specify the timeline for how quickly plastic sheeting will be applied to the areas of indicated outward air flow.
- d. Monitor the inlet and outlet of GAC units for VOC at least once every shift to ensure proper control of captured emissions. All monitoring results shall be documented and maintained in a daily log and made available to South Coast AQMD upon request.
- e. Conduct sampling at the inlet and outlet of GAC units for speciated organic compounds using a South Coast AQMD approved method (e.g. EPA TO-15). All results shall be maintained and made available to South Coast AQMD upon request. Sampling shall also include ammonia at the inlet and outlet of the units.
- f. Immediately shut down GAC units showing initial signs of breakthrough based on emissions monitoring.
- g. Maintain standby GAC units either at a readily accessible off-site storage location or on-site to accommodate timely GAC replacement to prevent and limit GAC breakthrough conditions.
- h. Monitor building pressure with three differential pressure monitoring systems on three different walls. Seal areas of positive differential pressure to the maximum extent possible.
- i. Any damage or wear and tear in the plastic sheeting shall be repaired or replaced within 72 hours.

4. Measures Specific to Building 2

- a. Existing Measures:

- i. Install carbon filters are being installed at doorways on Los Palos St and Union Pacific Ave at outlined in Odor Management Plan;
 - ii. Wrap damaged portion of the building as specified in Odor Management Plan; and
 - iii. Conduct daily inspections of wrapping as specified in Odor Management Plan.
- b. New Measures:
 - i. Containment
 - 1. Plastic sheeting is not required for the portion of the building where material is being actively worked on and shall provide sufficient space for the ingress and egress of equipment, materials and workers.
 - 2. Any damage or wear and tear in the plastic sheeting shall be repaired or replaced within 72 hours.
 - ii. Utilize products (e.g. Posi-lock) identified above in “Encapsulation of Odorous Waste” to create a solid, sealed barrier to prevent odorous emissions from organic debris in open air areas. Application of products shall be based on suggested timeframes from the manufacturer.
 - 1. Upon removal of all solid waste from Building 2, power wash, clean and disinfect concrete flooring.

5. Wastewater System (New Measures)

- a. Provide South Coast AQMD details on wastewater collection and storage system, locations of potential emissions where wastewater is open to air, products and compounds added to the wastewater, and lab analysis of wastewater tanks.
- b. Provide Rule 219 permit exemption for wastewater tanks or submit permit applications for tanks to South Coast AQMD, as appropriate.
- c. Include truck loading activities of sludge and/or wastewater in the Odor Management Plan. Significant odors were observed next to tanks containing wastewater.
- d. Keep all vessels containing wastewater closed, sealed, or vented to air pollution control. Air pollution control and odor mitigation strategies shall be evaluated in the Odor Management Plan for identified sources of wastewater odors.

6. Recordkeeping (New Measure)

- a. Log date, time, duration of work stoppages due to the emission of air contaminants. Include reasons for work stoppage, any measurements of air contaminants, and location of measurement.