

# Baker Commodities – LA Division

## Transloading Standard Operating Procedure

April 2024

### PURPOSE

To describe the Transloading Operations SOP for collection and transloading Hard Material at the Baker Commodities facility at 4020 Bandini Blvd., Vernon, CA (“the Facility”).

### SOP DEFINITIONS

“Hard Material” – Consists of animal fat and bone, including animal carcasses and parts, packing house or grocery store cuttings and out of date products, viscera, offal, feces and other organic matter generated by food processors, but expressly excluding any trap or restaurant grease material.

“Raw Material Enclosure” – The building enclosure which covers the pit and the slab where Hard Material is offloaded from transport vehicles. This is part of the Main Plant (C402).

“Collection Operations” - The temporary storage of Hard Material at the Facility prior to the transportation to a licensed rendering plant or pet food processor.

### GENERAL CONDITIONS

- 1) Baker shall store a maximum of 175,000 lbs. of Hard Material in its Raw Material Enclosure prior to completion of the enclosure extension. After the enclosure extension is permitted and construction is completed, the total maximum capacity shall be 400,000 lbs. No other raw material shall be stored in the Raw Material Enclosure.
- 2) Baker shall only receive, store, and load Hard Material in the Raw Material Enclosure.
- 3) Baker shall not load or unload any Hard Material outside of the Raw Material Enclosure.
- 4) Baker shall typically receive Hard Material between 6 a.m. and 10 p.m. but may also receive Hard Material after hours.
- 5) No long-term storage of Hard Material shall occur at the Facility.
- 6) Notwithstanding any additional conditions, below, the following minimum conditions shall be met:
  - a. Transport vehicles delivering Hard Material to the Facility from offsite locations shall not be permitted past the first point of contact for incoming trucks at the Facility unless the cargo area of the vehicle is completely enclosed or fully tarped. All drivers, whether Baker’s drivers or third-party drivers, shall transport Hard Material within the Facility in completely covered or enclosed cargo areas, including while exiting the Facility.
  - b. Baker shall ensure incoming Hard Material remains completely enclosed or fully tarped in a transport vehicle’s cargo area or is transferred into the Raw Material Enclosure or into covered containers within 60 minutes after the end of material delivery.
  - c. Where Hard Materials come directly into contact with a transport vehicle and the cargo area is exposed to the air, the cargo area shall be washed before exiting the Facility.
  - d. Open drums or containers holding Hard Materials, if any, shall be washed prior to leaving the Facility.

## **Baker Commodities – LA Division Transloading Standard Operating Procedure**

April 2024

- e. Walls, floors, and other surfaces of the Raw Material Enclosure shall be thoroughly washed to remove animal matter on a regular basis when such surfaces are not occupied by Hard Material or in use.
  - f. The Raw Material Enclosure Pit shall be washed down once per week. In performing these washdowns, Baker is not required to remove all animal matter from the pit, but must clean the pit to the extent reasonably practicable.
  - g. Accessible interior and exterior floor drains shall be inspected and cleaned not less frequently than once per month to remove accumulation of rendering materials.
- 7) Baker shall inspect the exterior of the Raw Material Enclosure daily, to ensure that no Hard Material escapes from the Raw Material Enclosure to the exterior.
  - 8) If Hard Material is discovered to have escaped from the Raw Material Enclosure to the exterior, Baker shall promptly clean up such material upon discovery, investigate how such material escaped, and take corrective action to prevent Hard Material from escaping in the future.
  - 9) Baker shall keep a signed log of any drivers turned away for not covering the cargo area containing Hard Material and provide this log to the South Coast AQMD upon request.
  - 10) Baker will perform housekeeping of the Raw Material Enclosure in accordance with the Housekeeping SOP.
  - 11) Baker shall keep records, in the form of weight tickets from the Facility scale, of the inbound and outbound material, to demonstrate compliance with General Condition No. 1, above. The records shall be made readily available during any inspection by or upon any request from South Coast AQMD personnel but shall be maintained by South Coast AQMD and Baker as confidential business information.
  - 12) Baker shall send the previous month's material records to South Coast AQMD (Attn: Paolo Longoni at [plongoni@aqmd.gov](mailto:plongoni@aqmd.gov)) on the first Tuesday of each month, for a total period of three months at which time this obligation shall terminate.
  - 13) Baker shall notify South Coast AQMD (Attn: Paolo Longoni at [plongoni@aqmd.gov](mailto:plongoni@aqmd.gov)) no less than three calendar days prior to starting collections operations.

**HARD MATERIAL PICKUP:** In addition to the above minimum requirements, the following requirements shall apply to Hard Material Pickup.

- 1) Any incoming Hard Material shall be transferred into the Raw Material Enclosure as soon as possible after passing the guard shack.
- 2) Baker anticipates receiving not more than 15 Hard Material truck load volumes per day, except in emergency situations.
- 3) No long-term storage of Hard Material will occur at the Facility.
- 4) After entering the Facility, all transport vehicles carrying Hard Material shall be taken to the certified scale at the Facility and weighed, and they may also be cleaned, fueled, repaired, or other actions may be taken.
- 5) The transport vehicles carrying Hard Material shall be taken directly from the scale to the Raw Material Enclosure or parking lot for staging before entering the Raw Material Enclosure for offloading into the Hard Material pit that is also within the Raw Material Enclosure, in accordance with the offloading SOP described below.

## **Baker Commodities – LA Division Transloading Standard Operating Procedure**

April 2024

- 6) All transport vehicles carrying Hard Material shall remain completely enclosed or fully tarped or within an enclosure while at the Facility.
- 7) All transport vehicles owned by Baker shall go through regular inspections per DOT regulations and receive regular preventive maintenance to ensure they are road-worthy and appropriate to transport Hard Material.
- 8) The cargo area of each transport vehicle used to deliver the material into the Raw Material Enclosure shall be washed prior to leaving the enclosure.
- 9) The transport vehicles' exterior shall be washed bi-weekly in a designated area of the Facility for the purpose of removing any residual waste and ensuring they are clean.
- 10) The empty transport vehicles will generally be parked overnight and on weekends at the Facility but may be parked across the street or at an offsite facility as needed.

HARD MATERIAL OFFLOADING: In addition to the above minimum requirements, the following requirements shall apply to Hard Material Offloading.

- 1) To offload transport vehicles carrying Hard Material, an employee shall open the rollup door to the Raw Material Enclosure to allow the transport vehicle carrying Hard Material into the enclosure. As soon the rollup door begins to open, the enclosure's air curtain shall automatically activate.
- 2) The employee offloading the transport vehicles shall deposit the Hard Material either directly to the pit or onto the ground within the Raw Material Enclosure. The Hard Material pit area shall be sloped toward drains as appropriate to capture any liquids that spill within the Raw Material Enclosure. The sumps collect and pump the liquid through a closed system to the water treatment plant, for further treatment.
- 3) After emptying the transport vehicle carrying Hard Material, the employee shall rinse the transport vehicle with water to wash off any excess Hard Material into the Raw Material Enclosure, drive the transport vehicle out of the enclosure, and close the rollup door to the enclosure.
- 4) Within the Raw Material Enclosure, employees shall use loaders to push the Hard Material into position for loading.

HARD MATERIAL LOADING: In addition to the above minimum requirements, the following requirements shall apply to Hard Material Loading.

- 1) Based on receiving 1-15 truck load volumes of Hard Material per day, the Facility anticipates loading 0 to 10 trailers per day with Hard Material for offsite delivery and processing.
- 2) The cargo area of each transport vehicle carrying loaded material out must be completely covered or enclosed prior to exiting the Raw Material Enclosure.
- 3) To load a trailer for offsite delivery and processing, an employee shall open the rollup door to the Raw Material Enclosure and back the empty trailer into the enclosure. As soon the rollup door begins to open, the enclosure's air curtain shall automatically activate.
- 4) Once inside the Raw Material Enclosure, an employee shall activate loading screws (after such screws are permitted and installed as per District permitting requirements) from the Hard Material pit over the top of the trailer being loaded and fill the trailer with Hard Material.

## **Baker Commodities – LA Division Transloading Standard Operating Procedure**

April 2024

- 5) In the event the screw system is not operable or not yet permitted, an employee shall use a loader or clam shell to lift Hard Material into the trailer being loaded within the Raw Material Enclosure.
- 6) Once the trailer is loaded, the employees shall cover the trailer, drive the loaded trailer out of the Raw Material Enclosure, and close the rollup door.

ODOR CONTROL MEASURES: In addition to the above minimum requirements, the following requirements shall apply to Odor Control Measures.

- 1) The Hard Material shall be contained within enclosed or covered transport vehicles or the Raw Material Enclosure at all times when at the Facility.
- 2) Spills outside of the Raw Material Enclosure are unlikely given the transport vehicles shall always be covered or closed. Any accidental spills of Hard Material shall be cleaned up immediately upon discovery. Depending on the size of the spill, employees can pick up and clean the spill by hand, a loader can be used to pick up and transport large Hard Material spills to within the Raw Material Enclosure, and a wash truck housed at the Facility can be driven to the spill site to spray down and clean exposed driving surfaces.
- 3) All employees have been or shall be trained on best practices (no later than 15 calendar days after the effective date of the modified order and thereafter, 15 calendar days after starting employment at Baker) for keeping the Facility clean. Baker shall maintain a log of the names of employees who have been trained and the dates of the training. Baker shall update this log each day there is a training and shall provide this log upon request. These best practices include regular washdowns of equipment that comes into contact with Hard Material and travels outside of an enclosure.
- 4) In the event of an odor complaint, the Odor Response Plan—that is, the entire actions listed in Table 1--shall be implemented and notice shall be given in writing to South Coast AQMD (at [plongoni@aqmd.gov](mailto:plongoni@aqmd.gov)) when the odor complaint was received and when the Odor Response Plan actions were completed.