

ODOR RESPONSE PLAN

PREPARED BY:

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1.0 Introduction

This Odor Response Plan sets forth the actions the Facility will take to address odor complaints received by Baker Commodities ("Baker") or the South Coast Air Quality Management District ("AQMD") concerning the Facility, and to minimize such odor complaints and prevent nuisance issues.

Baker maintains a policy of compliance with AQMD Rules and strives to minimize the potential for impacts of its Facility operations on the surrounding community. Baker expects all employees and Facility management to adhere to this Odor Response Plan during any odor related incident.

2.0 Potential Odor Generating Sources Related to the Facility

All Facility personnel shall follow the regulatory requirements and permit conditions and will work with the Environmental Compliance Specialist to ensure that compliance continues to occur.

Any odor complaint received concerning the Facility shall be directed to the Environmental Compliance Specialist (ECS) for prompt investigation and processing in accordance with the Odor Response Plan set forth below.

3.0 Potential Odor Sources and Response Plan to Minimize Odors

Table 1
Odor Response Plan

Upon receipt of an odor complaint, Baker shall identify the Potential Odor Generating Source(s) most relevant to the complaint and take the following steps as follows:

Potential Odor Generating Source	Potential Odor Incident	Odor Control Practices
Raw Rendering Material	<ul style="list-style-type: none"> Potential odors arising from raw rendering material. 	<ul style="list-style-type: none"> ECS or his/her designee shall conduct a complete walkthrough of the raw material handling facilities with the Plant Manager or a Supervisor addressing housekeeping issues to ensure that all Odor BMPs are followed and raw rendering material is contained in covered or enclosed vehicles and within the raw rendering material receiving pit enclosure. ECS and the Plant Manager or a Supervisor shall identify any spills and clean or direct them to be cleaned immediately. ECS and the Plant Manager or a Supervisor shall generate a record of inspection documenting this walkthrough, a brief record of findings and any actions taken. This walkthrough shall occur on the business day of the odor complaint or the first business day thereafter, as feasible.

<p>Raw Material Enclosure and Pit Receiving Area</p>	<ul style="list-style-type: none"> • Potential odors generated from the enclosed area. 	<ul style="list-style-type: none"> • ECS and the Plant Manager or a Supervisor shall inspect the raw material enclosure for leaks and ensure rollup doors and air curtains are working properly and in use for all truck traffic. ECS shall ensure all employees are trained to keep enclosure rollup door closed when truck traffic is not traveling in or out, and shall issue refresher training as needed. • The Plant Manager or a Supervisor shall confirm regular washing of the floors of the enclosure with a mixture of hot water and cleaning chemicals. • On the day of this inspection, ECS and/or the Plant Manager or a Supervisor shall confirm floor drains are clear of blockages and operational (in addition to daily inspection and cleaning of floor drains). • ECS and the Plant Manager or a Supervisor shall generate a record of inspection documenting the inspection of rollup doors, air curtains, floor drains, and a brief record of findings and any actions taken. Any issues shall be immediately reported to Operations and/or corrected. • This inspection shall occur on the business day of the odor complaint or the first business day thereafter, as feasible.
<p>Centrifuges</p>	<ul style="list-style-type: none"> • Potential odors arising from sludge/trash. 	<ul style="list-style-type: none"> • ECS or the Plant Manager or a Supervisor shall inspect: <ul style="list-style-type: none"> ○ all seals on trash bins and chutes to ensure all are within compliance, ○ all ducting to condensers for vapor

		<p>leaks and seal any visible leaks, and</p> <ul style="list-style-type: none"> • ECS and the Plant Manager or a Supervisor shall generate a record of inspection and a brief record of findings and any actions taken. Any issues shall be immediately reported to Operations and/or corrected. • This inspection shall occur on the business day of the odor complaint or the first business day thereafter, as feasible. • Signage placed on or around key pieces of equipment to remind employees to keep doors and hatches closed shall be inspected. Missing or damaged signage shall be replaced. • Employees shall be disciplined for leaving any equipment doors or hatches open that are required to be closed during operations. Record of such discipline shall be kept with inspection records.
<p>Wastewater Treatment Plant</p>	<ul style="list-style-type: none"> • Odors arising from receiving pit, flotation units, tanks, and dewatering presses. 	<ul style="list-style-type: none"> • ECS and the Plant Manager or a Supervisor shall: <ul style="list-style-type: none"> ○ check tank integrity for any visible leaks, ○ turn on misters, ○ check ducting to scrubber for vapor leaks and seal any visible leaks, and ○ check scrubber to ensure it is running within permitted compliance limits. • ECS and the Plant Manager or a Supervisor shall generate a record of inspection and a brief record of findings and any actions taken. Any issues shall be immediately reported to Operations and/or corrected.

		<ul style="list-style-type: none"> • This inspection shall occur on the business day of the odor complaint or the first business day thereafter, as feasible.
Boiler/afterburner	<ul style="list-style-type: none"> • Release of emissions. 	<ul style="list-style-type: none"> • ECS and the Plant Manager or a Supervisor shall: <ul style="list-style-type: none"> ○ ensure boiler/afterburners are working within compliant temperature. ○ ensure all equipment and ducting is working properly. • ECS and the Plant Manager or a Supervisor shall generate a record of inspection and a brief record of findings and any actions taken. Any issues shall be immediately reported to Operations and/or corrected. • This inspection shall occur on the business day of the odor complaint or the first business day thereafter, as feasible.
Response for Unknown Odors or General Complaints		<ul style="list-style-type: none"> • ECS and the Plant Manager or a Supervisor shall: <ul style="list-style-type: none"> ○ turn on misters. ○ walk the facility to ensure there are no leaks or spills and to ensure all required doors and hatches are closed. ○ check all inbound and outbound trucks for proper coverage/closure. ○ note the wind direction and the general direction of the complaint to determine whether the location of the complaint is in line with the wind direction from Baker's facility. • ECS and the Plant Manager or a Supervisor

		<p>shall generate a record of inspection and a brief record of findings and any actions taken. Any issues shall be immediately reported to Operations and/or corrected.</p> <ul style="list-style-type: none">• This inspection shall occur on the business day of the odor complaint or the first business day thereafter, as feasible.
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