

February 25, 2022

Chair Ben Benoit and the South Coast AQMD Governing Board
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

RE: Rendering Plant Odor Affecting Southeast Los Angeles Communities

Dear Chair Benoit and the Governing Board of the South Coast AQMD:

We are writing to you to urge you to take immediate action to strengthen and clarify Rule 415, the South Coast Air Quality Management District's policy regarding Rendering Plants.

For years our Southeast Los Angeles communities have voiced concerns about harmful and bothersome odors wafting from local rendering facilities. The harsh odors are a daily occurrence for our communities, some of the most densely populated, multicultural and under-resourced communities in the District.

Rule 415, adopted November 3, 2017, describes requirements for Odor Mitigation Plans, signage and tracking of odor complaints, and record-keeping at Rendering Plants. However, the rule does not specify consequences for Rendering Plants that do not meet these requirements.

Instead of inspections with enforcement, staff follow internal policies that rely on a quantity of external complaints about odors. When three or more individual complaints are received within a one-hour period, an inspector is sent out to verify and confirm the source. Upon confirmation from six individual reports, the plant may be issued a public nuisance violation. The rule is vague about accountability and requires several hours per day from individuals looking to report odor nuisances.

The District's internal policies are neither transparent nor effective. There are many situations the rule does not contemplate. For example: What happens when callers wish to remain anonymous? When they withhold their addresses because of fear of repercussions, especially if they fear government officials knocking on their doors? What if the smells are seeping through windows in the middle of the night?

Our communities are already overcoming several institutional barriers and difficulties. Reporting air quality concerns should not further disenfranchise environmental justice communities like those in Southeast Los Angeles. We urge you to refer this matter immediately to the Stationary Source Committee to discuss strengthening and clarifying Rule 415.

Sincerely,
South Coast AQMD's Environmental Justice Advisory Group (EJAG)¹

¹ Since the matter may be heard by the full South Coast AQMD Governing Board, Governing Board Members on EJAG did not vote on submitting this letter. Abstained from vote: Senator Vanessa Delgado (Ret.) (Chair of EJAG) and Veronica Padilla-Campos; Absent from vote: Supervisor Janice Rutherford (Vice Chair of EJAG).