| 3 | OFFICE OF THE GENERAL COUNSEL SOUTH COAST AIR QUALITY MANAGEMEN DAPHNE P. HSU, SBN 247256 PRINCIPAL DEPUTY DISTRICT COUNSEL NICHOLAS P. DWYER, SBN 299144 SENIOR DEPUTY DISTRICT COUNSEL 21865 Copley Drive Diamond Bar, California 91765 TEL: 909-396-3400 • FAX: 909-396-3458 Attorneys for Petitioner | | | |
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| 7 | SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT | | | |
| 8 | BEFORE THE HEARING BOARD OF THE | | | |
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| 11 | In The Matter Of | Case No. 62 | 23-1 | |
| 12 | SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, | DECLARA | TION OF DILLON HARRIS | |
| 13 | Petitioner, | | RT OF SOUTH COAST AIR | |
| 14 | vs. | MANAGE | MENT DISTRICT'S BRIEF IN RESPONSE TO | |
| 15 | BAKER COMMODITIES INC., | BAKER | COMMODITIES, INC.'S BRIEF IN SUPPORT OF ITS | |
| 16 | [Facility ID No. 800016] | | TO MODIFY THE ORDER | |
| 17 | Respondent. | | | |
| 18 | Respondent. | Date: Time: | December 13, 2022 9:00 am | |
| 19 | | Place: | Hearing Board | |
| 20 | | | South Coast Air Quality Management District 21865 Copley Drive | |
| 21 | | | Diamond Bar, CA 91765 | |
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| 1 | DECLARATION OF DILLON HARRIS | | | |
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| 2 | I, DILLON HARRIS, hereby declare as follows: | | | |
| 3 | 1. I have personal knowledge of the facts set forth herein, except as to those stated on | | | |
| 4 | information and belief and, as to those, I am informed and believe them to be true. If called as a | | | |
| 5 | witness, I could and would competently testify to the matters stated herein. | | | |
| 6 | 2. I am an Air Quality Inspector II at the South Coast Air Quality Management District | | | |
| 7 | ("South Coast AQMD" or "District"). Currently, I am working out of class as Staff Specialist. Since | | | |
| 8 | 2018, I have inspected rendering facilities within the South Coast AQMD jurisdiction, including | | | |
| 9 | Baker Commodities' facility ("Baker's facility") located in Vernon, California. | | | |
| 10 | 3. Baker's facility holds a Title V and RECLAIM permit and continues to submit | | | |
| 11 | records and reports to maintain those permits. | | | |
| 12 | 4. I have inspected Baker's trap grease processing operations many times, with the last | | | |
| 13 | time being on September 22, 2022. I recall the process being very odorous and giving off sour | | | |
| 14 | smells of rotting food. | | | |
| 15 | 5. In my opinion, allowing trap grease processing at Baker's facility to operate without | | | |
| 16 | the controls required by Rule 415 would create increased risk of nuisance odors. | | | |
| 17 | I declare under penalty of perjury under the laws of the State of California that the foregoing | | | |
| 18 | is true and correct. | | | |
| 19 | Executed in Riverside, California on December 7, 2022. | | | |
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| 21 | T:11 1/ | | | |
| 22 | Dillon Harris | | | |
| 23 | DILLON HARRIS | | | |
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| 1 | PROOF OF SERVICE | | |
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| 2 | I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 21865 Copley Drive, Diamond Bar, CA 91765. | | |
| 4 5 6 7 8 9 10 | On December 7, 2022, I served the within document(s) described as DECLARATION OF DILLON HARRIS IN SUPPORT OF SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT'S OPENING BRIEF IN RESPONSE TO BAKER COMMODITIES, INC.'S OPENING BRIEF IN SUPPORT OF ITS REQUEST TO MODIFY THE ORDER FOR ABATEMENT on the interested parties in this action as stated below: [on the attached service list]. (BY MAIL) By placing a true copy of the foregoing document(s) in a sealed envelope addressed as set forth above. I placed each such envelope for collection and mailing following ordinary business practices. I am readily familiar with this District's practice for collection and processing of correspondence for mailing. Under that practice, the correspondence would be deposited with the United States Postal Service, with postage thereon fully prepaid at Diamond Bar, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit. (BY OVERNIGHT DELIVERY) I deposited in a box or other facility regularly maintained by Overnight Express, an express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document(s) in a sealed envelope or package designated by the express service carrier, addressed as set forth above, with fees for overnight delivery paid or provided for. | | |
| 16 17 | (BY FAX) By transmitting a true copy of the foregoing document(s) via facsimile transmission from this District's sending facsimile machine, whose telephone number is (909) 396-2961, to each interested party at the facsimile machine telephone number(s) set forth on the attached mailing list. Said transmission(s) were completed on the aforesaid date at the time stated on the transmission record issued by the District's sending facsimile machine. Each such transmission was reported as complete and without error and a transmission report was properly issued by the District's sending facsimile machine for each interested party served. A true copy of each transmission report is attached to the office copy of this proof of service and will be provided upon request. (BY PERSONAL SERVICE) I caused to be delivered a true copy of the foregoing document(s) in a sealed envelope by hand to the offices of the above addressee(s). | | |
| 2122232425 | (BY E-MAIL) By transmitting a true .pdf copy of the foregoing document(s) by e-mail transmission from Jiledan@aqmd.gov to each interested party at the e-mail address(es) set forth above [on the attached service list]. Said transmission(s) were completed on the aforesaid date at the time stated on declarant's e-mail transmission record. Executed on December 7, 2022, at Diamond Bar, California. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. | | |
| 262728 | Joyce Iledan (Type or print name) (Signature) | | |

PROOF OF SERVICE

| 1 | SERVICE LIST | | | | |
|---------------------------------|--|---|--|--|--|
| 2 | | | | | |
| 3 | Alene M. Taber Dana Dean | Attorneys for Baker Commodities, Inc. Facility ID No. 800016 | | | |
| 4 | Niran S. Somasundaram Wiemond Wu | | | | |
| 5 | Hanson Bridgett LLP 425 Market Street, 26 th Floor | | | | |
| 6 | San Francisco, California 94105 Telephone: (415) 777-3200 | | | | |
| 7 | Facsimile: (415) 541-9366 | | | | |
| 8 | ataber@hansonbridgett.com ddean@hansonbridgett.com | | | | |
| 9 | nsomasundaram@hansonbridgett.com wwu@hansonbridgett.com | | | | |
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