



City of Tacoma

City Council

Ralph Munoz, Engineer
Puget Sound Clean Air Agency
1904 Third Avenue, Suite 105
Seattle, Washington 98101

Re: Puget Sound Clean Air Agency Proposed Order No. 12348 for Darling Ingredients Inc.

Dear Ralph Munoz,

This letter is to submit public comment on the Puget Sound Clean Air Agency's preliminary determination that proposed Order No. 12348 should be approved, subject to the conditions in the proposed Order.

This permit for Darling Ingredients Inc. is to replace rendering equipment that was previously destroyed in a fire. The Tacoma City Council has long heard from community about air quality concerns related to the rendering plant, making its future operation practices of great interest to our constituents. Discussions with eastside and northeast community members about the former plant will quickly bring up memories of air pollution and pungent smells that lowered the quality of life for nearby residents. These air quality issues have historically been especially concerning to McKinley Hill residents, who live in low and very low equity areas of our City just south of Tacoma's tideflats.

While we understand the economic [and environmental](#) benefits of an accessible rendering plant near our commercial businesses, the City of Tacoma imbeds equity in all policies and seeks to ensure minimal negative side effects from future development in our city. This is of special importance when those impacts could exacerbate historic inequities. Whatever is approved at this point in time will impact generations of Tacomans, their health, and their quality of life. To that end, we urge you to utilize your regulatory authority to require the maximum mitigations allowable under state law when approving the redevelopment of this rendering plant. This is especially important to address the need to reduce smells and pollution and other practices impacting air quality.

It was heartening to see the Agency's proposed Order of Approval contains numerous new conditions that aim to ensure compliance with the applicable regulations. The proposed Order includes a

requirement for the facility to establish a complaint response program, including a public complaint phone line. We encourage any conditions you can place that can strengthen the requirements to be responsive to community concerns when they are reported. The proposed Order also requires periodic inspections for compromises in the integrity of the cooking system and its associated ductwork or in the building envelope, and unrepaired compromises may constitute violations. Additionally, the proposed Order requires periodic testing for emissions of volatile organic compounds, carbon monoxide, nitrogen oxides, particulate matter, sulfur oxides, and hydrogen sulfide. These conditions recognize the need to ensure the rebuilt plant is a better neighbor to Tacoma residents in perpetuity. We ask that you fully retain and consider further enhancing these mitigations.

We appreciate the Puget Sound Clean Air Agency's ongoing work to protect public health, improve neighborhood air quality, and reduce our region's contribution to climate change. Thank you for this opportunity to provide public comment.

Sincerely,

DRAFT