

COVINGTON

BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
JOHANNESBURG LONDON LOS ANGELES NEW YORK
PALO ALTO SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

Covington & Burling LLP
Salesforce Tower
415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
T +1 415 591 6000

Via Email

July 21, 2026

Nicholas Sanchez
Assistant Chief Deputy Counsel
South Coast Air Quality Management District
Office of the General Counsel
P.O Box 4940
Diamond Bar, CA 91765
nsanchez@aqmd.gov

Re: Response to Demand for Immediate Odor Mitigation

Dear Mr. Sanchez:

On behalf of Lineage Logistics PFS, LLC (“Lineage”), I am responding to your letter dated last Friday, July 17, 2026, addressed to Greg Lehmkuhl and Dominic DiCarlo of Lineage Inc. regarding the fire damage to the Lineage warehouse in Boyle Heights. Lineage recognizes the impact on the surrounding community of the warehouse and is working continuously to mitigate that impact through extensive clean-up and odor mitigation efforts. We appreciate the South Coast Air Quality Management District’s (“Air District”) commitment to work collaboratively with Lineage, and we remain willing to continue working with the Air District to address these concerns.

As background, Lineage is the tenant-operator of the Los Palos facility and subleases the rooftop to a subsidiary of Altus Power, the owner of the solar array that is responsible for its design, installation, operation, maintenance, and repair. The power generated by the array is not used by the facility, but delivered to the local distribution utility for use in the Los Angeles area. At the time when the fire ignited on June 17, 2026, Pearce, a contractor of Altus, was in the process of installing and testing the updated array and had personnel on the roof of the facility. Lineage currently believes the fire began while testing was being conducted on the rooftop solar array. The fire was largely extinguished on June 29, 2026, and, since then, demolition, debris removal and food waste removal have been ongoing.

As the Air District recognizes, Lineage is implementing its Odor Management Plan throughout the clean-up process. In addition, Lineage has prepared a Community Exposure Mitigation Plan (“CEMP”), which was submitted to the Los Angeles County Department of Public Health last Thursday, July 16, 2026, and is provided as an attachment to this letter. As explained in a meeting with your office on July 20, the CEMP, which was prepared by Lineage in consultation with experts in air quality, odor and public health from Ramboll Americas Engineering, Inc. (“Ramboll”), augments the Odor Management Plan and includes, among other items, clear procedures for communication to the surrounding community about actions occurring during cleanup. The CEMP also includes a detailed discussion of how Lineage is assessing and mitigating

COVINGTON

Nicolas Sanchez
July 21, 2026
Page 2

air quality and odor impacts associated with the site, and the air-quality and odor monitoring conducted within the community to date.

Lineage appreciates the Air District's coordination, including the proposed measures outlined in Attachment 2 to your July 17 letter. Many of these proposed measures have already been implemented or are in-process and others are feasible to implement. However, some of the proposed measures are not feasible or would only prolong the food-removal and clean-up process for several months, such that they would have a negative overall impact on Lineage's odor-mitigation efforts.

In particular, due to the scale of the clean-up operation and the equipment being used to remove waste from Building 1, wrapping or placing food waste in a sealed container within the building before removal would significantly extend the cleanup process, without providing meaningful odor-mitigation benefits. This is particularly true, given that Building 1 remains largely contained, its ventilation system is pulling a vacuum and controlled by granulated activated carbon, and is being emptied of food waste directly into covered and sealed roll-off bins. According to Lineage's demolition and waste removal contractors, requiring this of Lineage could add several months to the removal effort, during which time-period odors will likely persist and, in fact, get worse due to degradation of the food waste. It is also worth noting that portions of the food waste are in a liquid state, such that wrapping it would prove immensely challenging, time-consuming, and counterproductive to our shared goal of ensuring that the site is able to remove all food waste as quickly as possible.

Other measures proposed for both buildings, e.g., application of odor-encapsulant material via hydrotreating, are similarly inapt for Building 1, given that the conditions within Building 1 are too damp for any such applied material to create a crust. Such measures will actively be applied as proposed by the Air District throughout removal operations in Building 2.

To better describe the unique circumstances posed by Buildings 1 and 2 and its efforts to mitigate odor impacts related to food- and debris-removal activities being conducted in them, Lineage would be happy to meet with Air District personnel and provide photos or video of the conditions within Buildings 1 or 2 or any other information.

* * *

Below are responses detailing Lineage's progress or completion of each proposed measure in Attachment 2.

1. Background

The background information stated in Attachment 2 is correct.

2. General Measures for Buildings 1 and 2

a. Misting System

The misting measures in the Odor Management Plan have been implemented and are in place.

COVINGTON

Nicolas Sanchez
July 21, 2026
Page 3

b. Wind Break Plan on Indiana Street

The Air District proposes that Lineage submit a Wind Break Plan to minimize wind tunnel effects on Indiana Street and install a wind monitoring station, along with developing work stoppage criteria during high winds.

The North end of Indiana Street currently has a 7-foot-tall screened fence, which helps mitigate wind in the area. Lineage can install a wind monitoring station and develop work-stoppage criteria for high winds. However, Lineage does not currently believe that installing a wind break along Indiana Street would alleviate odor impacts, as the wind break would need to be at least fourteen feet off the ground, which could amplify the wind-tunnel effect on Indiana Street.

While Lineage will adhere to any safety standards necessary to conducting work in an elevated and possibly turbulent environment, any work stoppage will have a negative impact on the clean-up process by extending the clean-up timeline, potentially impacting the surrounding community for a greater length of time than would otherwise be necessary. Additionally, the cause of any odors transported by the wind would likely be the volume of remaining food product onsite, not necessarily loading activities; so it is unclear that halting loading activities until wind conditions subside would reduce odor impacts to any discernible extent. Accordingly, Lineage will want to work with the Air District and its consultants to develop an appropriate threshold for stopping work, should one be included in any order for abatement.

c. Loading of Trucks

The existing measures identified by the Air District, live-loading of trucks and lining roll-offs/trucks as specified in the Odor Management Plan, have been implemented and are in place.

The Air District proposes that Lineage apply odor neutralizer prior to and during loading, including during excavation of the waste material. This is being implemented by spraying food waste from Building 1 with bleach and deodorizer, and waste material from Building 2 with odor control, bleach, and water.

The Air District proposes that each truck be covered with either a solid covering or a vinyl tarp or the equivalent. Once food waste from Building 1 is loaded into roll-off bins, those bins are immediately sealed. The bins are sealed hazmat shipping containers meeting requirements of the Department of Transportation and the National Transportation Safety Board. Burned debris from Building 2 is covered with a 2-inch foam barrier and tarping.

The Air District proposes that Lineage minimize the drop height of decomposing food and waste from the loader bucket to the truck and load trucks as close to the building as safely and reasonably as possible. Both measures have been implemented.

d. Loaded Trucks

The Air District proposes that Lineage cover any loaded truck sitting at or near the property for 8 or more hours and place a canopy or shade cover over any loaded truck that will be sitting for more than 12 hours. The roll-off bins into which food waste is loaded are sealed immediately.

COVINGTON

Nicolas Sanchez
July 21, 2026
Page 4

Because of the scale and speed of the clean-up process, no loaded trucks remain on the property for more than 12 hours.

e. Housekeeping

The existing measures identified by the Air District, including daily washing and inspections to ensure that roll-off bins are tightly covered and are not leaking, have been implemented and are in place.

The Air District proposes that Lineage implement daily washing of additional areas, empty and wash drains used to collect runoff, and conduct daily mobile wet scrubber sweeping on streets where loaded trucks are traversing. Lineage has already implemented daily washing of areas with runoff and loading areas and empties and washes drains used to collect runoff. Any equipment operated in the building not actively in use is stored in non-demolition areas inside the building. In addition, every truck exiting the facility undergoes wheel washing. Lineage is not currently conducting wet scrubber sweeping but can implement this measure if needed.

f. Encapsulation and Control of Odorous Waste

The Air District proposes that Lineage apply odor encapsulate material (e.g. Posi-Lock) to odorous waste material. Lineage will start applying Posi-Lock to odorous waste in Building 2 before the end of the week of July 20. Lineage can also implement the Air District's proposals to apply Posi-Lock on top of the remaining exposed waste material when excavation has ceased for the day and to incorporate routine odor surveillance and apply additional Posi-Lock if the applied encapsulant material has degraded. However, applying Posi-Lock to odorous waste in Building 1 would impede clean-up efforts because the moisture in Building 1 would prevent the Posi-Lock from drying. Thus, any Posi-Lock applied in Building 1 would not effectively prevent odor migration and would make removal of the waste more difficult.

The Air District proposes that Lineage apply odor neutralizer before or during application of the odor encapsulant. Lineage is applying odor neutralizer to the waste multiple times per day and will continue to do so.

g. Signage

The Air District proposes that Lineage install signs with instructions for reporting air quality issues on each side of the facility and within 50 feet of the main entrance. Lineage will install signs as proposed.

h. Community Communication Plan

The Air District proposes that Lineage develop a plan to communicate to the public the status and anticipated activities at the facility, including truck routes, general status updates, anticipated work, and contact information for an onsite environmental coordinator. Lineage's community communication plan is outlined in its Community Exposure Mitigation Plan, dated July 16, 2026 ("CEMP," attached). This plan includes a strategy for communication to the surrounding community about actions occurring at the facility. Contact information for an onsite

COVINGTON

Nicolas Sanchez
July 21, 2026
Page 5

environmental coordinator is as follows: Helen Dubach, CEM, CEP, REM, Director, Environmental Response, Onterris, hdubach@onterris.com, 1-504-616-2427. In addition, Lineage has a bilingual response website to provide information to the community (<https://www.onelineage.com/boyle-heights-fire-response>) and has established a community support email at BoyleHeights@onelineage.com to answer questions from the community. As stated in the CEMP, a community request form is also available on the recovery webpage ([onelineage.com/lospalos](https://www.onelineage.com/lospalos)). Lineage also hosts a dedicated Instagram account (@lineagelospalos) to share ongoing updates on cleanup progress.

Truck routes are available in Appendix C to the Emergency Waste Management, Characterization and Disposal Work Plan, which is included as an attachment to the Community Exposure Mitigation Plan. Lineage is open to sharing the truck routes with the community and will assess the best method for doing so.

The Air District proposes that Lineage notify the community if any of the following occurs: 1) The wall between Building 1 and Building 2 is opened; 2) Opening of plastic covering on Union Pacific or Indiana is needed while decomposing food or waste is being moved; 3) Accidental collapse of building structure; or 4) Significant spills of odorous materials or wastewater. Lineage is assessing the best way to implement this proposal, given that its experience to-date is that residents within the surrounding community are not actively monitoring online communications. Lineage commits to communicate its plans through the foregoing means described in the CEMP. With respect to spills or releases, Lineage also commits to adhere to all applicable reporting requirements, including those of the National Response Center and the California Office of Emergency Services.

3. Measures Specific to Building 1

a. Sealing Waste from Building 1

The Air District proposes that before any decomposing food or waste is moved out of Building 1, Lineage wrap the waste or place it in a sealed containment within the building. Alternatively, the Air District proposes that Lineage use temporary enclosed vestibules vented to air pollution control equipment if materials are brought out of Building 1 before being placed in containment. Due to the scale of the waste in Building 1 and the current processes for removing the waste, these proposals are not practical and would interfere with the efficient removal of the waste. Interfering with the efficient removal of waste would extend the time required to clean up the waste, thereby contributing to prolonged odors. In addition, the proposal to use enclosed vestibules is not feasible due to the layout of the building and the loading stations. Lineage invites the Air District to revisit the facility and closely observe the dedicated removal process inside of Building 1 to better understand why this proposal is not feasible nor conducive to the shared goal of achieving odor abatement.

b. Odor Management Plan

The Air District proposes that Lineage submit a detailed Odor Management Plan for how waste will be removed from Building 1. Lineage has worked with Onterris to prepare an Odor

COVINGTON

Nicolas Sanchez
July 21, 2026
Page 6

Management Plan, which is included as an attachment in the Community Exposure Mitigation Plan, which will be informed and augmented as described in the CEMP.

c. Smoke Tests to Demonstrate Inward Airflow

The Air District proposes that Lineage conduct smoke tests to demonstrate inward airflow through the openings in the middle wall and roof and use plastic sheeting to close any openings with outward air flow. Due to the structural issues with the building, Lineage does not currently believe it is feasible to implement this proposal. In addition, the dock and freezer doors need to remain open during the clean-up operation in order to allow for efficient waste removal; removal operations are ongoing 24-hours a day. Lineage will assess the feasibility of closing any dock doors not in active use in order to control odors and induce proper draft to optimize the GAC units. Lineage will also assess alternative methods for stopping any outward airflow from Building 1, but cannot commit to eliminate any outward airflow in light of the structural integrity of the buildings and challenges maintaining them.

d. Monitor GAC Units

The Air District proposes that Lineage monitor the inlet and outlet of GAC units for VOC and document the monitoring results, to be made available to South Coast AQMD upon request. Lineage is monitoring the GAC units for VOC and ammonia and is documenting the results throughout the day. These results can be made available to South Coast AQMD upon request.

e. Conduct Sampling of GAC Units

The Air District proposes that Lineage conduct sampling at the inlet and outlet of GAC units for speciated organic compounds using a South Coast AQMD approved method and make sampling results available to South Coast AQMD upon request. Lineage is conducting this sampling for organic compounds and ammonia. These results can be made available to South Coast AQMD upon request.

f. Shut Down GAC Units Showing Signs of Breakthrough

The Air District proposes that Lineage immediately shut down GAC units showing initial signs of breakthrough based on emissions monitoring. Lineage is currently implementing this proposal.

g. Maintain Standby GAC Units

The Air District proposes that Lineage maintain standby GAC units at a readily accessible off-site storage location or on site. Lineage maintains standby granulated-activated carbon on-site and has already twice replaced the GAC within these units to ensure appropriate mitigation of emissions.

h. Monitor Building Pressure

COVINGTON

Nicolas Sanchez
July 21, 2026
Page 7

The Air District proposes that Lineage monitor building pressure with three differential pressure monitoring systems and seal areas of positive differential pressure to the maximum extent possible. Similar to the proposed smoke tests, this proposal may not be feasible due to the structural issues with the building. Lineage can assess the feasibility of this proposal and alternative methods for mitigating the effects of differential pressure, given the current structural challenges of a building that has been compromised by fire.

i. Repair or Replace Plastic Sheeting

The Air District proposes that Lineage repair or replace any plastic sheeting that becomes damaged or worn within 72 hours. Lineage will implement this proposal.

4. Measures Specific to Building 2

a. Existing Measures

The Air District notes that carbon filters are being installed at doorways on Los Palos Street and Union Pacific Avenue. Filters have been installed on Los Palos Street but have not yet been installed on Union Pacific Avenue. Lineage is planning to install the filters on Union Pacific Avenue as outlined in the Odor Management Plan.

The other existing measures identified by the Air District, including wrapping the damaged portion of Building 2 and conducting daily inspections of the wrapping, have been implemented and are in place.

b. Containment

The Air District proposes that plastic sheeting is not required where material is being actively worked on. Lineage has wrapped all areas that can be wrapped in plastic sheeting and is assessing whether additional measures may be taken to contain the area, such as closing dock doors that are not in use.

The Air District proposes that any damage or wear and tear in plastic sheeting should be repaired or replaced within 72 hours. Lineage can implement this proposal.

c. Encapsulation and Removal of Waste

The Air District proposes that Lineage use products such as Posi-Lock to prevent odorous emissions from organic debris. Lineage will start applying Posi-Lock to odorous waste in Building 2 before the end of the week of July 20. The Air District proposes that upon removal of all solid waste from Building 2, Lineage power-wash, clean, and disinfect concrete flooring. Lineage can implement this proposal.

5. Wastewater System

The Air District proposes that Lineage provide the Air District details on wastewater collection and storage, locations of potential emissions where wastewater is open to air, products and

COVINGTON

Nicolas Sanchez
July 21, 2026
Page 8

compounds added to the wastewater, and lab analysis of wastewater tanks. Lineage has worked with Onterris to prepare a Water Management Plan, included as Appendix E to the Community Exposure Mitigation Plan. Lineage can provide additional information to the Air District upon request.

The Air District proposes that Lineage provide the Rule 219 permit exemption for wastewater tanks or submit permit applications for tanks to South Coast AQMD, as appropriate. Lineage is assessing how it will respond to this request.

The Air District proposes that Lineage include truck loading activities of sludge and/or wastewater in the Odor Management Plan. These are already included in the Odor Management Plan and can be augmented upon any reasonable Air District requests.

The Air District proposes that Lineage keep all vessels containing wastewater closed, sealed, or vented to air pollution control, and that Lineage evaluate air pollution control and odor mitigation strategies for identified sources of wastewater odors. Lineage can and is willing to implement this proposal, according to Air District direction. Lineage is in the process of sealing the large storage tank and frac tanks and will assess addition strategies for mitigating wastewater odors.

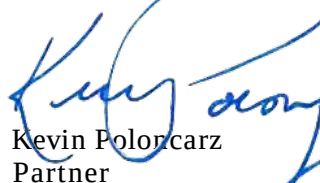
6. Recordkeeping

The Air District proposes that Lineage log the date, time, and duration of any work stoppages due to the emission of air contaminants, including the reasons for work stoppage, measurements of air contaminants, and location of measurement. Lineage anticipates meeting the Air District's recordkeeping requirements.

* * *

Lineage is committed to working with South Coast AQMD to address these concerns and mitigate the impact of the warehouse fire on the surrounding community. Please feel free to contact me if you have any questions about the foregoing responses or this matter.

Respectfully submitted,



Kevin Poloncarz
Partner

Attachments