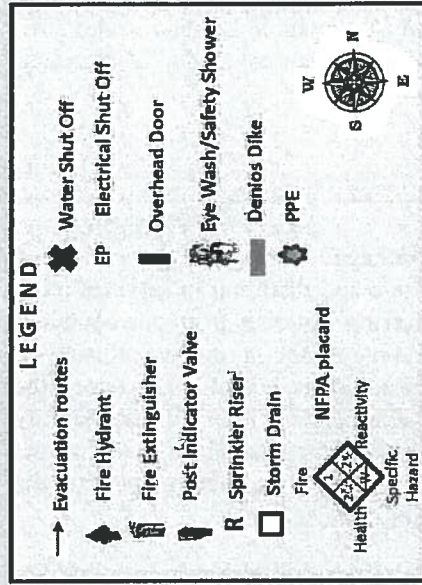


South Wilmington Avenue



East Dominguez St.

Evacuation Assembly Area

Pump House

TENANT

OFFICE (2 Stories)



2137-A East Dominguez Street  
Garson, CA 90810

85,248 SQ. FT.  
S-1 Non-Regulated

ESFR - 52 PSI  
ESFR Pendant No-17  
(Early Suppression Fast Response)

2,000 sq. ft. COOLER

500 sq. ft. FREEZER

12,200 SQ. FT.  
H-3 Flammable/Combustibles  
AFFF Sprinkler  
45/2,000 SQ. FT. Pendant No-11.1

5,376 sq. ft. COOLER

46,607 SQ. FT.  
H-4 Corrosives / Poisons  
ESFR - 03 PSI  
ESFR Pendant No-17  
(Early Suppression Fast Response)

16,250 SQ. FT.  
H-3 Flammable/Combustibles  
AFFF Sprinkler  
45/2,000 SQ. FT. Pendant No-11.1



NOT TO SCALE

FIGURE 2  
SITE PLAN

SOURCE: Inland Star Distribution Centers 2016, TAHA, 2016.

Inland Distribution Center, Inc.  
Initial Study/Mitigated Negative Declaration

CITY OF CARSON



taha 2016-066



**OSHA Standards:** 1910.106 – Flammable Liquids; 1910.120 – Hazardous Materials Waste Operations and Emergency Response; and 1910.1200 – Hazard Communication.

**NFPA Codes:** 10, Standard for Portable Fire Extinguishers; 13, Standard for the Installation of Sprinkler Systems; 16, Standard for the Installation of Foam-Water Sprinkler and Foam Water Spray Systems; 20, Standard for Stationary Pumps for Fire Protection; 25, Standard for the Inspection, Testing, and Maintenance of Water Based Fire Protection Systems; 30, Flammable and Combustible Liquids Code; 30B, Standard for the Manufacturing and Storage of Aerosol Products; 70, National Electrical Code; 72, National Fire Alarm and Signaling Code; and 400, Hazardous Material Code.

## 2.2 PROJECT OPERATIONS

---

The existing warehouse facility receives, stores, and ships various packaged chemicals and industrial materials for manufactures and distributors. The applicant performs storage and distribution services only. Company operations do not include: blending, mixing, formulating, transferring materials from one container to another, or opening of containers. All materials are pre-approved based on a thorough review and analysis of each product by the applicant to ensure that the warehouse infrastructure is compliant to store the materials. This analysis is performed by a licensed and certified fire protection engineer and all materials are received in approved Department of Transportation (DOT) packaging. Inbound trucks are directed to the inbound receiving dock, where materials are unloaded and counted. Material is then moved to the appropriate warehouse area and placed into storage in pallet racking or floor stack schemes.

The existing warehouse facility has approximately 20 employees comprised of customer service representatives, warehouse specialists, supervision, and management. The applicant has developed an Emergency Action Plan (EAP) for the purpose of protecting employees and the surrounding community. The EAP covers procedures for: 1) evacuating and accounting for visitors and employees, 2) dealing with a chemical release and other foreseeable emergencies could occur on-site, 3) notifying external agencies and emergency response personnel, and 4) administering first aid measures for chemical exposure. Employees are informed of the elements of the EAP initially and annually. In the event of a chemical release, employees will evacuate or shelter-in-place, depending on the nature of the release, and the facility will contact the City's Public Safety Manager and the LACFD for assistance as necessary.

## 2.3 REGULATORY FRAMEWORK

---

Operations at the project site are regulated through federal and State programs. The applicant maintains an Emergency Preparedness Contingency Plan (EPCP) developed in accordance with Title 40 Code of Federal Regulations (CFR) Part 262, Title 29 CFR Section 1910.120 and 191.38 and the California Environmental Protection Agency (EPA). As required by law, an EPCP was developed for the project site to assist the onsite emergency coordinator or his or her designee in determining appropriate response procedures. The applicant is compliant with standards set by the American Chemistry Council's Responsible Care Management System process, the Chemical Process Safety Institute of Chemical Engineers, and the National Association of Chemical Distributors for Responsible Distribution. Due to the storage need of manufacturers and distributors, the project site is subject to 40 CFR, Part 355, Appendix A and require a Hazardous Material Business Plan (HMBP).

**Hazardous Material Business Plan (HMBP):** The purpose of the HMBP is to provide basic information necessary for use by first responders in order to prevent or mitigate damage to public health and safety and/or to the environment from release of a hazardous material. Any business that handles a hazardous material and/or hazardous waste of quantities at any one time during a year equal to, or greater than a total volume of 55 gallons, a total weight of 500 pounds, or 200 cubic feet of a compressed gas is a hazardous materials handler and must report submit a HMBP, which consists of the following: Owner/Operator, Business





Activities, Inventory, Site Map, and Emergency Response and Contingency Plan and Employee Training Plan information in the California Environmental Reporting System (CERS). The HMBP for the proposed project was submitted initially to the LACFD, Health Hazardous Materials Division, on June 27, 2016. Since that date, the plan has been revised to more accurately reflect site-specific procedures and current chemical inventories. Currently, the HMBP has been re-submitted and the applicant is awaiting acceptance.

### Fire Prevention Strategy

Each permitted fire suppression system installed in the Carson facility was carefully engineered to protect a wide range of product and storage configurations. Four (4) distinct suppression systems (described in the chart below) establish a Highly Protected risk (HPR) occupancy for the site.

Area	Occupancy	Storage Classification	Fire Suppression System
A A - Cooler	S-1	Non Regulated, Combustibles (Flash Points above 200 degrees F), Class 1 Oxidizers & Aerosols (L-1, L-2 & L-3) & Class I through Class IV Commodities, cartoned Group A nonexpanded plastics per NFPA 13	Pendent K=17 ESFR* Sprinkler design @ 52-PSI
B B- Cooler B-Freezer	H-3	Flammables	AFFF** .45/3,000 with In-Rack Sprinklers; Pendent K=11.2
C	H-3	Class 2 Oxidizers	AFFF** .45/3,000; Pendent K=11.2
D	H-4	Corrosives & Poisons	Upright K=17 ESFR* Sprinkler design @ 42-PSI

\*ESFR = Early Suppression Fast Response

\*\*AFFF = Aqueous Film Forming Foam

The suppression system is supported by a back-up diesel Fire Pump. The pump is supported from street pressure of 133 PSI and puts out at 63 PSI with no static discharge. At 64 PSI it puts out 1,250 gallons per minute. At maximum capacity it can put out 3,750 GPM. The only sprinkler heads that would open would be those that are heated enough to melt the solder. This fire system is state of the art, and we the suppression infrastructures are configured based on the nature of the product requiring extinguishing. There are ten (10) easily accessible fire hydrants on site.



### 3.0 INITIAL STUDY CHECKLIST AND EVALUATION

#### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Aesthetics               | <input type="checkbox"/> Agriculture / Forestry Resources         | <input type="checkbox"/> Air Quality                                   |
| <input type="checkbox"/> Biological Resources     | <input type="checkbox"/> Cultural Resources                       | <input type="checkbox"/> Geology / Soils                               |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards / Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality                     |
| <input type="checkbox"/> Land Use / Planning      | <input type="checkbox"/> Mineral Resources                        | <input type="checkbox"/> Noise   |
| <input type="checkbox"/> Population / Housing     | <input type="checkbox"/> Public Services                          | <input type="checkbox"/> Recreation                                    |
| <input type="checkbox"/> Transportation/ Traffic  | <input type="checkbox"/> Utilities / Service Systems              | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

**DETERMINATION:** (To be completed by the Lead Agency):

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Printed Name

For



	Potentially Significant Impact Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
<b>I. AESTHETICS. Would the project:</b>			
<b>a) Have a substantial adverse effect on a scenic vista?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project developed structures that permanently obstruct or are visually incompatible with a scenic vista. The project site is within an established industrial area and is not within or proximate to a scenic vista. Furthermore, the proposed project consists solely of a request for approval of the CUP for the storage of hazardous materials. Implementation of the proposed project would not involve the demolition, construction, or any other alterations to the project site. Therefore, no impact would occur.			
<b>b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would substantially damage scenic resources within a State Scenic Highway. The project site is not located within or adjacent to a State Scenic Highway, nor would the proposed project involve the demolition, construction, or any other alterations to the project site. Therefore, no impact would occur.			
<b>c) Substantially degrade the existing visual character or quality of the site and its surroundings?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would substantially degrade the existing visual character or quality of the project site and its surroundings. The project site is within an existing building that is designated and zoned for industrial manufacturing and warehousing uses, in an established industrial area. No modifications or new development activities are proposed under the proposed project. Therefore, no impact would occur.			
<b>d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if light and glare substantially interfered with off-site activity. The project site is developed with an existing building in an existing industrial park with security and way-finding lighting typical of this use type. There are no viewsheds or sensitive uses that could be affected by light or glare at the project site; further, no new light or glare sources are proposed under the proposed project. Therefore, no impact would occur.			
<b>II. AGRICULTURE AND FORESTRY RESOURCES. Would the project:</b>			
<b>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would convert valued farmland to non-agricultural uses. The project site is within an established industrial park in an urbanized area. No farmland or agricultural uses occur on or near the project site. Therefore, no impact would occur.			



	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
<b>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project conflicted with existing agricultural zoning or agricultural parcels enrolled under the Williamson Act. As discussed above, the project site is within an established industrial park in an urbanized area, and there are no agriculture uses or Williamson Act lands on or surrounding the project site. Therefore, no impact would occur.				
<b>c) Conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project conflicted with existing zoning for, or caused rezoning of forestland or timberland. No forestland or timberland uses are located in the project site's urban, industrial setting. Therefore, no impact would occur.				
<b>d) Result in the loss of forestland or conversion of forestland to non-forest use?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project resulted in the loss of forestland or in the conversion of forestland to non-forest use. No forestland or timberland uses are located at the project site or within the surrounding urban, industrial setting. Therefore, no impact would occur.				
<b>e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project caused the conversion of farmland to non-agricultural use. The proposed project would not involve changes to the existing environment which could result in the conversion of farmland or forestland and these uses are not proximate to the project site. Therefore, no impact would occur.				
<b>III. AIR QUALITY. Would the project:</b>				
<b>a) Conflict with or obstruct implementation of the applicable air quality plan?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The South Coast Air Quality Management District (SCAQMD) and Southern California Association of Governments (SCAG) have responsibility for preparing the Air Quality Management Plan (AQMP), which details goals, policies, and programs for improving air quality in the South Coast Air Basin. According to the SCAQMD, there are two key indicators of consistency with the AQMP: 1) whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP; and 2) whether the project will exceed the assumptions in the AQMP based on the year of project build out. The first consistency criterion refers to violations of the California Ambient Air Quality Standards. As further discussed below, operational emissions (e.g., mobile sources and utilities demand) do not exceed the SCAQMD significance thresholds, and would not interfere with attainment or maintenance of ambient air quality standards. Therefore, the existing warehouse facility complies with Consistency Criterion No. 1.</p> <p>The second consistency criterion requires that the existing warehouse facility not exceed the assumptions in the AQMP. A project is consistent with the AQMP if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) provides growth forecasts for the SCAG</p>				



	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact																																																							
region. The facility is located in the City of Carson, and the City's employment was forecasted to grow by approximately 5,500 jobs between 2012 and 2020. The existing warehouse facility has approximately 20 employees, which constitutes approximately 0.3 percent of the forecasted growth within the City between 2012 and 2020 and does not significantly change employment projections. The facility has no effect on local population and housing projections. The facility is consistent with growth assumptions included in the AQMP, and complies with Consistency Criterion No. 2. The proposed project would not increase employment. Therefore, this impact would be less than significant.																																																											
<b>b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>																																																							
<p>Air quality is defined by ambient air concentrations of seven specific pollutants identified by the United States Environmental Protection Agency to be of concern with respect to health and welfare of the general public. These specific pollutants, known as criteria air pollutants, are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants include carbon monoxide (CO), ground-level ozone (O<sub>3</sub>), nitrogen oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>), particulate matter 2.5 microns or less in diameter (PM<sub>2.5</sub>), particulate matter ten microns or less in diameter (PM<sub>10</sub>), and lead (Pb). The SCAQMD is responsible for regulatory oversight of air quality in the South Coast Air Basin and has established significance thresholds associated with assessing the potential for impacts under CEQA. The SCAQMD recommends the use of the California Emissions Estimator Model (CalEEMod, version 2013.2.2) as a tool for quantifying emissions. Operational emissions at the facility are produced primarily by vehicular travel and energy use. No construction activities are proposed, and the air quality analysis focuses on operational emissions.</p> <p>Based on the applicant's inbound and outbound trip logs, the existing facility generates 75 total truck trips per day and 78 total worker vehicle trips. Trip distances were based on CalEEMod default values. Mobile source emissions were calculated using EMFAC2014 and utilities demand emissions were calculated using CalEEMod. As shown in <b>Table 2</b>, facility emissions do not exceed the SCAQMD operational significance thresholds. The proposed project would not increase operational activities above existing conditions. Therefore, this impact would be less than significant.</p>																																																											
<p><b>TABLE 2: ESTIMATED DAILY OPERATIONAL EMISSIONS</b></p> <table border="1"> <thead> <tr> <th rowspan="2">Operational</th> <th colspan="6">Pounds Per Day</th> </tr> <tr> <th>VOC</th> <th>NO<sub>x</sub></th> <th>CO</th> <th>SO<sub>x</sub></th> <th>PM<sub>10</sub></th> <th>PM<sub>2.5</sub></th> </tr> </thead> <tbody> <tr> <td>Area Sources</td> <td>6.7</td> <td>0.00</td> <td>0.03</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Energy Sources</td> <td>0.03</td> <td>0.28</td> <td>0.23</td> <td>0.00</td> <td>0.02</td> <td>0.02</td> </tr> <tr> <td>Mobile Sources</td> <td>0.72</td> <td>18</td> <td>4.6</td> <td>0.00</td> <td>0.18</td> <td>0.17</td> </tr> <tr> <td><i>Total</i></td> <td>7.5</td> <td>18</td> <td>4.9</td> <td>0.00</td> <td>0.20</td> <td>0.19</td> </tr> <tr> <td>Regional Threshold</td> <td>55</td> <td>55</td> <td>550</td> <td>150</td> <td>150</td> <td>55</td> </tr> <tr> <td>Exceed Threshold?</td> <td>No</td> <td>No</td> <td>No</td> <td>No</td> <td>No</td> <td>No</td> </tr> </tbody> </table> <p>SOURCE: TAHA, 2016.</p>					Operational	Pounds Per Day						VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	Area Sources	6.7	0.00	0.03	0.00	0.00	0.00	Energy Sources	0.03	0.28	0.23	0.00	0.02	0.02	Mobile Sources	0.72	18	4.6	0.00	0.18	0.17	<i>Total</i>	7.5	18	4.9	0.00	0.20	0.19	Regional Threshold	55	55	550	150	150	55	Exceed Threshold?	No	No	No	No	No	No
Operational	Pounds Per Day																																																										
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>																																																					
Area Sources	6.7	0.00	0.03	0.00	0.00	0.00																																																					
Energy Sources	0.03	0.28	0.23	0.00	0.02	0.02																																																					
Mobile Sources	0.72	18	4.6	0.00	0.18	0.17																																																					
<i>Total</i>	7.5	18	4.9	0.00	0.20	0.19																																																					
Regional Threshold	55	55	550	150	150	55																																																					
Exceed Threshold?	No	No	No	No	No	No																																																					





	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
<b>c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Because the South Coast Air Basin is designated as State and/or federal nonattainment for various pollutants, including O<sub>3</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub>, there is an ongoing regional cumulative impact associated with these pollutants. An individual project can emit these pollutants on a regional level without significantly contributing to this cumulative impact depending on the magnitude of emissions. The SCAQMD has indicated that the project-level thresholds may be used as an indicator to determine if project emissions contribute to a cumulative impact. As discussed above, the existing warehouse facility does not generate emissions that exceed the SCAQMD thresholds. The proposed project would not increase criteria pollutants over existing conditions. Therefore, this impact would be less than significant.</p>				
<b>d) Expose sensitive receptors to substantial pollutant concentrations?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The SCAQMD has established localized significance thresholds for identifying significant increases in pollutant concentrations. The thresholds account for the distance from the source to the receptor, and include a maximum screening distance of 1,640 feet (500 meters). The nearest sensitive land uses are residences located approximately 2,150 feet (655 meters) to the east. Trucks associated with the facility generate particulate matter and toxic air containers. However, based on the SCAQMD screening criteria and the distance to the nearest sensitive receptor, the existing warehouse facility does not generate excessive localized pollutant emissions. The proposed project would not increase pollutant emissions over existing conditions. Therefore, this impact would be less than significant.</p> <p>In addition, the applicant consulted with the SCAQMD regarding potential air quality permits. An SCAQMD letter provided on June 9, 2016 states that the facility is exempt from permit requirements per Rule 203(a) as a facility that stores and distributes industrial materials without the use of polluting equipment. Therefore, this impact would be less than significant.</p>				
<b>e) Create objectionable odors affecting a substantial number of people?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. None of these uses are located at the project site and the proposed project would not generate noxious odors. In addition, the proposed project is required to comply with SCAQMD Rule 402 (Nuisance), which controls noxious odors. Therefore, this impact would be less than significant.</p>				
<b>IV. BIOLOGICAL RESOURCES. Would the project:</b>				
<b>a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>A significant impact would occur if the proposed project resulted in the loss or destruction of individuals of a species or through the degradation of sensitive habitat. No candidate, sensitive, or special status species habitats or related plans, policies, or regulations occur on or in proximity to the project site. Therefore, no impact would occur.</p>				





	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
<b>b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if any riparian habitat or natural community would be lost or destroyed as a result of urban development. The project site is within an established industrial park in an urbanized area. No riparian habitat or other sensitive natural communities have been identified on or proximate to the project site. Therefore, no impact would occur.				
<b>c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if federally protected wetlands would be modified or removed by a project. The project site does not contain any federally protected wetlands, wetland resources, or other waters of the United States as defined by Section 404 of the Clean Water Act. As discussed above, the project site is within an established industrial park. No wetlands protected or otherwise, exist on or proximate to the project site. Therefore, no impact would occur.				
<b>d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would interfere with, or remove access to, a migratory wildlife corridor or impede use of native wildlife nursery sites. The project site is fully improved and does not contain trees or waterways that could serve as wildlife corridors or nursery sites. As it is within an established industrial area, no such biological resources are located in proximity to the project site. Therefore, no impact would occur.				
<b>e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would be inconsistent with local regulations pertaining to biological resources. As discussed above, the project site is fully improved and does not contain protected biological resources. Further, no tree removal or other landscape modifications are proposed. Thus, the proposed project would not interfere with local biological preservation policies or ordinances. Therefore, no impact would occur.				
<b>f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would be inconsistent with any adopted habitat conservation plan. The project site and surrounding uses are designation as industrial land, and no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan applies to the project site. Therefore, no impact would occur.				

	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
<b>V. CULTURAL RESOURCES. Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would substantially alter the environmental context of or remove identified historical resources. The project site does not contain nor is it adjacent to any identified historic resources. Further, no demolition or construction activities are proposed. Therefore, no impact would occur.				
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. Though project site does not contain any known archaeological resource, it is possible that unknown archaeological resources occur under the project site. However, no grading, excavation, demolition, or construction activities are proposed. Therefore, no impact would occur.				
c) Directly or indirectly destroy a unique paleontological resource or site; archaeological or historical site, structure, or object; or unique geological feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if excavation or construction activities associated with the proposed project would disturb paleontological or unique geological features. The project site does not contain any known unique paleontological resource; archaeological or historical site, structure, or object; or unique geological feature. It is possible that unknown subsurface resources occur under the project site; however, no grading, excavation, demolition, or construction activities are proposed. Therefore, no impact would occur.				
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if previously interred human remains would be disturbed during excavation of the project site. It is possible that as yet undiscovered human remains occur under the project site. However, no grading, excavation, demolition, or construction activities are proposed. Therefore, no impact would occur.				
<b>VI. GEOLOGY AND SOILS. Would the project:</b>				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The project site is located in the seismically active Southern California region; however, it is not within an Alquist-Priolo Zone. The City's General Plan Regional Fault Map indicates that the project site is in the Newport Inglewood structural zone and states that surface faulting does not appear to be a significant potential hazard. The industrial park wherein the project site is located was constructed in accordance with the CBC, which includes requirements for structures that reduce the potential for exposure of people or				





	Potentially Significant Impact Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
structures to seismic risks to the maximum extent possible. In addition, the improvements previously constructed by the applicant are in compliance with all applicable building regulations including the City's zoning code and the CBC. Furthermore, no new construction is proposed; as such, it would not expose additional people or structures to potential substantial adverse effects. Therefore, no impact would occur.			
<b>ii) Strong seismic ground shaking?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would cause personal injury or death or resulted in property damage as a result of seismic ground shaking. The entire Southern California region, including the project site, is susceptible to strong ground shaking from severe earthquakes. As discussed above, the industrial park wherein the project site is located was constructed in accordance with the CBC, which includes requirements for structures that reduce the potential for exposure of people or structures to seismic risks to the maximum extent possible. In addition, the improvements previously constructed by the applicant are in compliance with all applicable building regulations and no new construction is proposed; as such, it would not expose additional people or structures to potential substantial adverse effects. Therefore, no impact would occur.			
<b>iii) Seismic-related ground failure, including liquefaction?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would cause personal injury or death or resulted in property damage as a result of liquefaction or other ground failure. According to the City's General Plan, the site is located in an area where historic occurrences of liquefaction or local geological geotechnical or ground water conditions indicate a potential for permanent ground displacements. However, the industrial park wherein the project site is located was constructed in accordance with the CBC, which includes requirements for structures that reduce the potential for exposure of people or structures to seismic risks to the maximum extent possible. The improvements previously constructed by the applicant are also in compliance with all applicable building regulations, and no new construction is proposed. As such, the proposed project would not expose additional people or structures to potential substantial adverse effects. Therefore, no impact would occur.			
<b>iv) Landslides?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would cause personal injury or death or resulted in property damage as a result of a landslide. The project site would not expose people or structures to potential landslides due to the relatively flat topography of the project site and surrounding area. Furthermore, no new construction is proposed; as such, it would not expose additional people or structures to potential substantial adverse effects. Therefore, no impact would occur.			
<b>b) Result in substantial soil erosion or the loss of topsoil?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if construction activities or future uses would result in substantial soil erosion or loss of topsoil. The project site is located within an existing building in a fully urbanized area that does not contain exposed soil. Furthermore, no grading excavation, or other soil-disturbing activities are proposed. Therefore, no impact would occur.			

*Handwritten signature/initials*

	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
c) <i>Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would be located in a hillside area with unstable geological conditions. The project site is located within an existing building in a fully urbanized area with relatively flat topography. The existing industrial park was constructed in accordance with all applicable building codes to reduce the potential for exposure of people or structures to such to the maximum extent possible. Furthermore, no grading, excavation, or other soil-disturbing activities are proposed under the project. Therefore, no impact would occur.				
d) <i>Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project occurred on a site with expansive soils without the implementation of proper site preparation or design features. The project site is located within an existing building. Prior to construction, a geotechnical study was performed, in part, to identify the presence of expansive soil. Building construction complied with all applicable building codes, which reduce the potential for exposure of people or structures to such risks to the maximum extent possible. Therefore, no impact would occur.				
e) <i>Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A project would cause a significant impact if adequate wastewater disposal is not available. The project site is located within an existing building and is served by community water and sewer service. Furthermore, no septic tanks or alternative wastewater disposal systems are in use or would be required under the proposed project. Therefore, no impact would occur.				
<b>VII. GREENHOUSE EMISSIONS. Would the project:</b>				
a) <i>Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
GHG emissions refer to a group of emissions that are generally believed to affect global climate conditions. The greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass panes in a greenhouse let heat from sunlight in and reduce the amount of heat that escapes. GHGs, such as carbon dioxide (CO <sub>2</sub> ), methane (CH <sub>4</sub> ), and nitrous oxide (N <sub>2</sub> O), keep the average surface temperature of the Earth close to 60°F. CO <sub>2</sub> is the most abundant pollutant that contributes to climate change through fossil fuel combustion. The other GHGs are less abundant but have higher global warming potential than CO <sub>2</sub> . To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent of CO <sub>2</sub> , denoted as CO <sub>2</sub> e.				
The existing facility generates GHG emissions from vehicular traffic and utilities demand. According to the applicant's inbound and outbound trip logs, the project site generate 75 total truck trips per day and 78 total worker vehicle trips. Based on EMFAC2014 emission rates, these trips generate 5,349 metric tons per year of CO <sub>2</sub> emissions. The approximately 254,411 square foot warehouse facility includes roughly 77,000 square feet of office space and 177,500 square feet of warehouse space. Based on CalEEMod, utilities demand generates 1,644 metric tons per year of CO <sub>2</sub> emissions. The total CO <sub>2</sub> emissions are approximately 6,993 metric tons per year.				



	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
The CEQA Guidelines require lead agencies to adopt GHG thresholds of significance. When adopting these thresholds, the Guidelines allows lead agencies to consider thresholds of significance adopted or recommended by other public agencies, or recommended by experts, provided that the thresholds are supported by substantial evidence, and/or to develop their own significance threshold. Neither the City nor the SCAQMD has officially adopted a quantitative threshold value for determining the significance of GHG emissions that will be generated by projects under CEQA. The SCAQMD convened a GHG CEQA Significance Threshold Stakeholder Working Group beginning in April of 2008 to examine alternatives for establishing quantitative GHG thresholds within the district's jurisdiction. The Working Group proposed a tiered screening methodology for assessing the potential significance of GHG emissions generated by CEQA projects. Under the Tier III methodology, the Working Group proposed a 10,000 metric tons year threshold for industrial projects. The total GHG emissions at the project site are approximately 6,993 metric tons per year, which is less than the 10,000 metric ton per year threshold. The proposed project would not change or increase activities at the project site and GHG would remain the same as under existing conditions. Therefore, this impact would be less than significant.				
<b>b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The City has not adopted a Greenhouse Gas Reduction Plan and the General Plan does not include a Greenhouse Gas Element. On a State level, Assembly Bill 32 focuses on reducing GHG emissions in California, and requires the California Air Resources Board (CARB) to adopt rules and regulations that achieve GHG emissions equivalent to Statewide levels in 1990 by 2020. Assembly Bill 32 set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. On December 11, 2008, CARB adopted the Scoping Plan, which sets forth the framework for facilitating the State's goal of reducing GHG emissions to 1990 levels by 2020. The First Update of the Scoping Plan was adopted on May 22, 2014 and CARB is drafting the next update of the Scoping Plan. The Second Update is expected to include strategies to meet a 2030 GHG reduction goal of 40 percent below 1990. Neither Assembly Bill 32 nor the updated Scoping Plan establishes regulations implementing, for specific projects, the Legislature's Statewide goals for reducing GHGs. The Scoping Plan outlines a series of technologically feasible and cost-effective measures to reduce Statewide GHG emissions, including expanding energy efficiency programs, increasing electricity production from renewable resources (at least 33 percent of the statewide electricity mix), and increasing automobile efficiency, implementing the Low-Carbon Fuel Standard, and developing a cap-and-trade program. These measures are designed to be implemented by State agencies. The facility would not interfere with implementation of the Assembly Bill 32 measures, and would not interfere with a local GHG reduction plans. Therefore, this impact would be less than significant.				
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:</b>				
<b>a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
A significant impact would occur if the proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The applicant receives and re-distributes packaged hazardous materials but does not use or dispose of hazardous materials at the project site. The applicant performs storage and distribution services only. Company operations do not include: blending, mixing, formulating, transferring materials from one container to another, or opening of containers. All materials are pre-approved based on a thorough review and analysis each product by the				



	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
<p>applicant to ensure that the warehouse infrastructure is compliant to store the materials. Title 49 of the CFR that grants the DOT responsibility to ensure the safety of the public, as well as the people directly involved in handling hazardous materials. In January 1988, the DOT gave local law enforcement agencies the authority to write a citation for travel violation or a citation for the improper transportation of shipping containers. Under the proposed project, all materials would be received in approved DOT packaging and pre-approval based on a thorough review.</p> <p>As described in detail under Section 2.0, Project Description, the project site and operational activities are regulated through a variety of federal and State programs as well as local mandates. All hazardous materials storage infrastructures and operational practices meet all applicable sections of CBC and CFC. The Applicant has also submitted a HMBP to provide the information necessary for use by first responders in order to prevent or mitigate damage to public health and safety and/or to the environment from release of a hazardous material. The HMBP for the proposed project was submitted initially to the LACFD, Health Hazardous Materials Division, on June 27, 2016. Since that date, the plan has been revised to more accurately reflect site-specific procedures and current chemical inventories. Currently, the HMBP has been re-submitted and the applicant is awaiting acceptance.</p> <p>The LACFD conducts annual inspections of the facility familiarizing itself with the site and surrounding community, and in the event of an emergency, the LACFD will perform community evacuation. The applicant has also developed an Emergency Action Plan (EAP) for the purpose of protecting employees and the surrounding community. In the event of a chemical release, employees will evacuate or shelter-in-place, depending on the nature of the release, and the City's Public Safety Manager and the LACFD will be contacted for assistance, as necessary.</p> <p><b>Mitigation Measures HAZ-1 and HAZ-2</b> are set forth to reduce potential impacts of the proposed project to a less than significant level.</p> <p><b>HAZ-1</b> An Emergency Action Plan (EAP) identifying the procedures for: 1) evacuating and accounting for visitors and employees, 2) dealing with a chemical release and other foreseeable emergencies could occur on-site, 3) notifying external agencies and emergency response personnel, and 4) administering first aid measures for chemical exposure shall be implemented for the proposed project.</p> <p><b>HAZ-2</b> A Hazardous Material Business Plan (HMBP) providing the information necessary for first responders to prevent or mitigate damage to public health and safety from the release of hazardous materials shall be prepared and submitted to the Los Angeles County Fire Department (LACFD), Health Hazardous Materials Division to aid in response efforts (facility and surrounding community) in the event of an emergency.</p>				
<p><b>b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>A significant impact would occur if the proposed project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials. As discussed above under checklist question VIII (a), compliance with the above-discussed regulations and the implementation of <b>Mitigation Measures HAZ-1 and HAZ-2</b> would reduce potential impacts of the proposed project to a less-</p>				





	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
than-significant level.				
c) <i>Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the project emits hazardous emissions or handles hazardous materials within one-quarter mile of an existing or proposed school. There is no known existing or proposed schools within one-quarter mile of the project site. Del Amo Elementary School represents the nearest school located roughly 0.4 miles from the project site across South Wilmington Avenue to the southwest. Various urban and industrial uses occupy the properties between the project site and the school. Therefore, no impact would occur. Additionally, compliance with the above-discussed regulations and the implementation of <b>Mitigation Measures HAZ-1</b> and <b>HAZ-2</b> would reduce potential impacts of the proposed project to a less-than-significant level.				
d) <i>Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would create a significant hazard to the public or the environment. The California Department of Toxic Substances Control (DTSC) maintains a database (EnviroStor) that provides access to detailed information on hazardous waste permitted sites and corrective action facilities, as well as existing site cleanup information. EnviroStor also provides information on investigation, cleanup, permitting, and/or corrective actions that are planned, being conducted, or have been completed under DTSC's oversight. A review of EnviroStor did not identify any records of hazardous materials site associated with address of the project site. However, EnviroStor listed two remediation sites associated with the following uses are adjacent to the project site: metal galvanizing (2226 East Dominguez Street) and light steel manufacturing (2160 East Dominguez Street). Both sites have received achieved cleanup certification. Therefore, no impact would occur.				
e) <i>For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project exposed persons residing or working in the area to risks associated with the proximity of an airport or in an airport plan area. The project site is approximately 3.6 miles south of the Compton Airport, 3.9 miles west of the Long Beach Airport, and 6.2 miles northeast of the Torrance Airport – Zamperini Field. The project site is not located within the land use plan for these three airports. Therefore, no impact would occur.				
f) <i>For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project exposed persons residing or working in the area to risks associated with the proximity of a private airstrip. The Goodyear Blimp base is located approximately 2.6 miles northwest of the project site. The Blimp typically travels west towards the coast and does not typically create audible noise at the facility. The project site is not within the vicinity of a private airstrip. Therefore, no impact would occur.				



	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
<b>g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project impaired the implementation of an emergency response or evacuation plan or blockage of an emergency route. The City's has adopted the Multi-Hazard Functional Plan (1996) identifies emergency protocol, critical meeting areas, and emergency evacuation routes. The four major freeways (I-405, SR-91, I-110, and I-710) as well arterial streets with right-of-way widths of from 80 to 100 feet at one-half mile intervals would serve as potential evacuation routes during a disaster. Potential evacuation routes that occur near the site include: Carson Street, Del Amo Boulevard, Alameda Street, and Wilmington Avenue. The project site is not located directly along an evacuation route and operations under the proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, no impact would occur.				
<b>h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project exposed people and structures to wildfire risks. The project site is located in a highly urbanized area of the City. The area surrounding the project site is completely developed. Accordingly, the project site and the surrounding area are not subject to wildland fires. Therefore, no impacts related to exposure of people or structures to a risk of loss, injury, or death involving wildland fires would occur.				
<b>IX. HYDROLOGY AND WATER QUALITY. Would the project:</b>				
<b>a) Violate any water quality standards or waste discharge requirements?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project discharges water that does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems. The project does not propose modifications that would affect water quality and it would not discharge waste such that a violation would occur. As previously stated, the existing warehouse facility complies with applicable building standards. Therefore, no impact would occur.				
<b>b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would substantially deplete groundwater or interferes with groundwater recharge. The project site is served by California Water Service (CalWater) and the proposed project would not require the direct use of groundwater at the project site. In addition, the existing project site is almost entirely impermeable and does provide for percolation of surface water into the groundwater table. Therefore, no impact would occur.				
<b>c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on-or off-site?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would substantially alter the drainage pattern of an existing stream or river so that erosion or siltation would result. No streams or rivers occur on or in				





	Potentially Significant Impact Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
proximity to the project site. The project site is fully improved and does not contain exposed soil. Surface runoff is currently directed to the existing stormwater infrastructure (e.g., gutters, storm drains). As no grading or other construction activities are proposed, drainage patterns would be maintained. Therefore, no impact would occur.			
<b>d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would substantially alter the drainage pattern of an existing stream or river such that flooding would result. No streams or rivers occur on or in proximity to the project site. Surface runoff is currently directed to the existing stormwater infrastructure (e.g., gutters, storm drains). As no construction activities are proposed, the proposed project would not result increased runoff rates or amounts and drainage patterns would be maintained. Therefore, no impact would occur.			
<b>e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if runoff water would exceed the capacity of existing or planned storm drain systems serving the project site, or if the proposed project would substantially increase polluted runoff. Surface runoff is currently directed to the existing stormwater infrastructure, which adequately serves the project site. As no new development is proposed, the proposed project would not increase runoff or generate substantial additional sources of polluted runoff. Therefore, no impact would occur.			
<b>f) Otherwise substantially degrade water quality?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would substantially degrade water quality in manner not previously addressed. The proposed project would not degrade water quality beyond the scope of the above checklist question IX (a-e). Therefore, no impact would occur.			
<b>g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would be located within a 100-year floodplain. According to the City's General Plan, the project site is not within 100-year flood hazard area. Further, the proposed project does would not include a housing component. Therefore, no impact would occur.			
<b>h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would be located within a 100-year floodplain and would impede or redirect flood flows. As stated above, checklist question IX (e), the project site is not within 100-year flood hazard area. Further, the proposed project does would not include the development of any new structures or modification of the existing drainage patterns. Therefore, no impact would occur.			



	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
<b>i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would be located within an area susceptible to flooding as a result of the failure of a levee or dam. The project site is not in a flood zone and is not proximate to a dam or levee. Therefore, no impact would occur.				
<b>j) Inundation by seiche, tsunami, or mudflow?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would be located within an area susceptible to inundation by seiche, tsunami, or mudflow. The project site is not located in a seiche, inundation zone, or tsunami hazard zone. In addition, the project site and the surrounding areas are not located downslope from any unprotected grade so as to be exposed to mudflows. Therefore, no impact would occur.				
<b>X. LAND USE AND PLANNING. Would the project:</b>				
<b>a) Physically divide an established community?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would be sufficiently large or configured in such a way so as to create a physical barrier within an established community. The project site is located within an existing building in an established industrial area. Further, the proposed project does not include the development of any new structures and would not introduce a barrier into the community. Therefore, no impact would occur.				
<b>b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A significant impact would occur if the proposed project would conflict with applicable land use plans, policies, or regulations of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. The proposed project is consistent with the existing industrial land use and zoning designations set forth in the Carson Municipal Code and the General Plan. However, to operate in accordance with local planning regulations, the applicant is seeking approval of the aforementioned CUP and certificate of occupancy by way of this environmental document. With the City's approval of these actions, impacts would be less than significant.				
<b>c) Conflict with any applicable habitat conservation plan or natural community conservation plan?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project were located within an area governed by a habitat conservation plan or natural community conservation plan. The project site is within an urbanized area and not subject to a habitat conservation plan or natural community conservation plan. Therefore, no impact would occur.				
<b>XI. MINERAL RESOURCES. Would the project:</b>				
<b>a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would result in the loss of availability of known mineral resources. The project site is not located in an area that contains known mineral resources. Under				





	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
the proposed project, no grading or excavation activities are proposed. Therefore, no impact would occur.				
<b>b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would result in the loss of availability of locally important mineral resources. The project site is not identified as an area that contains known mineral resources in the City's General Plan. Under the proposed project, no grading or excavation activities are proposed. Therefore, no impact would occur.				
<b>XII. NOISE. Would the project result in:</b>				
<b>a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The City has adopted the Los Angeles Noise Control Ordinance with a few exceptions described in Chapter 6 (Noise Control Ordinance) of the Carson Municipal Code. The project site is surrounded on all sides by other industrial land uses, warehouses, and distribution facilities. These land uses are not sensitive to increased noise levels. The nearest sensitive land uses are residences separated from the project by a railroad right-of-way and major roadways.</p> <p>The Noise Control Ordinance limits noise generated on a property to 70 decibels at adjacent industrial land uses. Heating, Ventilation, and Air Conditioning equipment is located on the roof of the warehouse facility and does not generate audible noise at the property line. Section 12.08.460 (Loading and Unloading Operations) of the Carson Municipal Code limits loading, unloading, opening, closing or other handling of boxes, crates, containers, building materials, garbage cans or similar objects between the hours of 10:00 p.m. and 6:00 a.m. in such a manner as to not cause noise disturbance. There is no potential for the loading and unloading activities associated with the proposed project to disturb noise-sensitive land uses given that the adjacent land uses are also industrial facilities. These industrial facilities are not sensitive to increases noise levels. In addition, neither mechanical noise nor loading and unloading noise generated at the facility are audible at the residences to the east due to distance and intervening structures that shield noise. Therefore, this impact would be less than significant.</p>				
<b>b) Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The proposed project would not operate heavy-duty equipment construction equipment that generates short-term increases in noise levels and no construction activities are proposed. Trucks associated with the existing warehouse facility have the potential to generate vibration. The Federal Transit Administration has stated that rubber-tired vehicles do not typically generate perceptible vibration levels outside of the right-of-way, and vibration from trucks is not perceptible beyond the project site. Regarding operations, the proposed project would not include mechanical equipment that is a perceptible source of vibration. Therefore, this impact would be less than significant.</p>				
<b>c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>A significant impact would occur if the proposed project caused a substantial permanent increase in noise levels above existing ambient levels. As stated in checklist question XII (a), the proposed project would not generate substantial permanent noise associated with mechanical equipment or truck loading and unloading.</p>				



	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
Therefore, this impact would be less than significant.				
<b>d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project resulted in substantial temporary or periodic increase in ambient noise levels. The proposed project would not utilize heavy-duty equipment construction equipment that generates short-term increases in noise levels. No construction activities are proposed. Therefore, the facility results in no impact would occur.				
<b>e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels from a public airport or public use airport. The project site is approximately 3.6 miles south of the Compton Airport, 3.9 miles west of the Long Beach Airport, and 6.2 miles northeast of the Torrance Airport – Zamperini Field. The project site is not located within the land use plan for these three airports. Therefore, no impact related to excessive noise levels associated with public airports would occur.				
<b>f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels from a private airstrip. The project site is not within the proximity of a private airstrip. The Goodyear Blimp base is located approximately 2.6 miles northwest of the project site. The Blimp typically travels west towards the coast and does not typically create audible noise at the facility. Therefore, no impact would occur.				
<b>XIII. POPULATION AND HOUSING. Would the project:</b>				
<b>a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would induce substantial population growth that would not have otherwise occurred as rapidly or in as great a magnitude. The project site is located within an existing building in an established industrial area. No new homes or business are proposed and the project site utilizes existing infrastructure. Therefore, no impact would occur.				
<b>b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would displace a substantial quantity of existing residences. The project site is located within an existing building in an established industrial area. No housing would be displaced and no changes to the existing building are proposed. Therefore, no impact would occur.				





	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
c) <i>Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would displace a substantial number of people. The project site is located within an existing building in an established industrial area. No housing or populations would be displaced as no changes to the existing building are proposed. Therefore, no impact would occur.				
<b>XIV. PUBLIC SERVICES. Would the project result in:</b>				
a) <i>Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i>				
i) <i>Fire Protection?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A significant impact would occur if the LACFD could not adequately serve the proposed project, necessitating a new or physically altered station. The project site is currently served by and permitted for high-piled non-regulated, combustible, flammable and hazardous storage by the LACFD. As discussed above in Section 2.0, Project Description, Existing Safety Features, the applicant installed fire safety features to ensure fire suppression capabilities at the project site above established standards. All hazardous materials storage infrastructures and operational practices also meet all applicable sections of CBC and CFC. The project site's fire suppression system exceeds the CFC requirements for water volume and fire protection schemes. The Applicant has also submitted a Hazardous Materials Business Plan (HMBP) to the LACFD to provide the information necessary for use by first responders in order to prevent or mitigate damage to public health and safety and/or to the environment from release of a hazardous material. The HMBP for the proposed project was submitted initially to the LACFD, Health Hazardous Materials Division, on June 27, 2016. Since that date, the plan has been revised to more accurately reflect site-specific procedures and current chemical inventories. Currently, the HMBP has been re-submitted and the applicant is awaiting acceptance. The applicant has also developed an Emergency Action Plan (EAP) for the purpose of protecting employees and the surrounding community. The applicant also maintains operations safety protocols (e.g., EAP) also discussed above. In the event of a chemical release, employees will evacuate or shelter-in-place, depending on the nature of the release, and the City's Public Safety Manager and the LACFD will be contacted for assistance, as necessary. Further, the proposed project would not increase population or additional fire hazards above existing conditions. Therefore, impacts would be less than significant.				
ii) <i>Police Protection?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A significant impact would occur if the Los Angeles County Sheriff's Department could not adequately serve the proposed project, necessitating a new or physically altered station. The project site is served by local law enforcement. The proposed project would not include housing or other growth inducing features. Additionally, the applicant maintains 24-hour surveillance with monitored security cameras. As the proposed project would not increase population and includes security features, impacts would be less than significant.				
iii) <i>Schools?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the existing schools could not adequately serve the proposed project, necessitating new or physically altered facilities. The proposed project would not generate students as it				

	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
does not include housing or other growth inducing features. Therefore, no impact would occur.				
<b>iv) Parks?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the existing parks could not adequately serve the proposed project, necessitating new or physically altered facilities. The project site is roughly 0.8 miles walking distance to Dolphin Park located at 21205 Water Street. As no new development or population increase would occur, the proposed project would not result in increased use of parks. Therefore, no impact would occur.				
<b>v) Other Public Facilities?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the existing public facilities could not adequately serve the proposed project. The proposed project would not include any new development such as housing or other growth inducing features that could affect public facilities (e.g., libraries). Therefore, no impact would occur.				
<b>XV. RECREATION.</b>				
<b>a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project increased the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. As no new development is proposed, the project would not result in increased use of recreational facilities. See also response to checklist question IXV (iv). Therefore, no impact would occur.				
<b>b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project included a recreational component. The proposed project would not include the construction or expansion of recreational facilities. Therefore, no impact would occur.				
<b>XVI. TRANSPORTATION / TRAFFIC. Would the project:</b>				
<b>a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A significant impact would occur if the proposed project would increase traffic above the existing traffic load of the street system. The project site is accessible via major transportation corridors in the City including four major freeways (I-405, SR-91, I-110, and I-710) as well as: Carson Street, Del Amo Boulevard, Alameda Street, and Wilmington Avenue. Based on an average of the applicant's inbound and outbound daily trip logs, the existing facility generates an average of 75 total truck trips and 78 total worker vehicle trips per day. These trips are distributed throughout the weekday and are not concentrated during peak hours when the circulation system would be most affected. Trucks, including those transporting shipping containers, would continue to make deliveries and pick-ups at the existing facility with ingress and egress located on East Dominguez Street. Additionally, due to the availability and location of the project site relative to the major corridors discussed above, trips associated with the project would not interfere with the performance of the circulation system. Because the proposed project would not increase development or intensify operations on the project site, no				





	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
additional trips beyond existing conditions would occur. Therefore, impacts would be less than significant.				
<b>b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project individually or cumulatively exceeded the service standards of a Congestion Management Program (CMP). The CMP is a State-mandated program designed to address the impact urban congestion has on local communities and the region as a whole. The project site is not located adjacent to an active, adopted Los Angeles County CMP Intersection. Furthermore, the proposed project would not add 50 or more trips during the AM or PM peak hours any intersections in the City. The proposed project would not intensify existing operations that could increase trips over existing conditions. Therefore, no impact would occur.				
<b>c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would cause a change in air traffic patterns that would result in a substantial safety risk. The proposed project does not include an aviation component or include features that would interfere with air traffic patterns. Therefore, no impact would occur.				
<b>d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would substantially increase an existing hazardous design feature or introduced incompatible uses to the existing traffic pattern. The project site is located in a highly urbanized area developed with roadways and infrastructure. No modifications to the building structure or exterior improvements are proposed under the project. Trucks, including those transporting shipping containers, would continue to make deliveries and pick-ups at the existing facility with ingress and egress located on East Dominguez Street. As with existing conditions, access to the project site would occur via the major corridors discussed previously, avoiding residential streets and non-industrial neighborhoods. The movement of industrial materials to and from the project site is compatible with the surrounding industrial uses. The proposed project would not introduce any design features or alter the existing circulation or traffic patterns. Therefore, no impact would occur.				
<b>e) Result in inadequate emergency access?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the design of the proposed project would not satisfy emergency access requirements of the LACFD. The existing facility meets all requirements for emergency access, which would continue to be the case under the proposed project. No changes to the existing emergency access routes are proposed or required. Therefore, no impact would occur.				
<b>f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would conflict with programs supporting alternative transportation. According to the General Plan, the closest Class I bicycle path is located generally at the intersection of Wilmington Avenue and the Dominguez Channel. The General Plan indicates that bus Route "G" operates along Wilmington Avenue proximate to the project site and then turns west on Del Amo Boulevard. The proposed project would not include any development activities or affect alternative				



	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
transportation adopted policies, plans, or programs. Therefore, no impact would occur.				
<b>XVII. UTILITIES AND SERVICE SYSTEMS. <i>Would the project:</i></b>				
<b>a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB). The project site and the activities proposed are not subject to the National Pollutant Discharge Elimination System (NPDES) General Permit per the facilities list provided therein (Order 2014-0057-DWQ – effective July 1, 2015). As the proposed project would not include any modifications, construction, or development activities, wastewater treatment requirements would be similar to the current conditions at the existing warehouse facility. Therefore, no impact would occur.				
<b>b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. According to CalWater billing statements, monthly water usage is approximately 32,000 gallons per month. This falls below CalWater's estimated demand for a similar building of this size is 77,792 gallons per day. The proposed project would not include any modifications, construction, or development activities which would generate additional water or wastewater demands above existing conditions. Therefore, no impact would occur.				
<b>c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would increase surface water runoff, resulting in the need for expanded off-site storm water drainage facilities. The proposed project would maintain existing drainage patterns; site-generated surface water runoff would continue to flow to the City's storm drain system. As the proposed project would not include any modifications, construction, or development activities, stormwater infrastructure demands would not be greater than under existing conditions. Therefore, no impact would occur.				
<b>d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A significant impact would occur if there were insufficient supply from existing entitlements. Though the entire region is experiencing drought conditions, the proposed project would not increase water demand such that new or expanded entitlements are needed. CalWater currently serves the project site and no improvements are proposed which would generate additional water demand. Therefore, this impact would be less than significant.				
<b>e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project would exceed the wastewater provider's capacity due to existing commitments. The Joint Water Pollution Control Plant serves the project site. The capacity of this facility is limited to levels associated with approved growth identified by SCAG. As the proposed				





	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
project would not include development activities or increase population, it would not generate additional wastewater demands. Therefore, no impact would occur.				
<b>f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A significant impact would occur if the proposed project's solid waste generation exceeded the capacity of permitted landfills. A substantial amount of solid waste is disposed of throughout the region, requiring ongoing landfill expansions. As under existing conditions, solid waste would be collected by Waste Management and taken to the appropriate Sanitation Districts of Los Angeles County landfill with remaining capacity. Landfills operated by Sanitation Districts of Los Angeles County are subject to federal and State programs that regulate operations and capacity. The proposed project would not include any construction or operations that would generate additional solid waste over existing conditions. Therefore, this impact would be less than significant.				
<b>g) Comply with federal, state, and local statutes and regulations related to solid waste?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A significant impact would occur if the proposed project was non-compliant with solid waste requirements. The project site is subject to State and City mandates with respect to solid waste to such as the City's Diversion and Recycling Program. No hazardous waste is disposed of at the project site or as part of operations and solid waste generated is typical of industrial/office uses. No changes in disposal type, quantity, or practices are proposed as compared to existing conditions. The proposed project would comply with all applicable solid waste requirements. Therefore, no impact would occur.				
<b>XIX. MANDATORY FINDINGS OF SIGNIFICANCE.</b>				
<b>a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The proposed project would not include any new development or modification of the project site; thus, it does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish and wildlife species, cause a fish, or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Further, as discussed previously in the above checklist, the project site does not contain, nor is it adjacent to, such resources. Therefore, no impact would occur.				
<b>b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
A significant impact may occur if the proposed project, in conjunction with the related projects, would result in impacts that are significant when taken together. The proposed project would have less than significant or no impact with respect to most environmental topics, as discussed in the above checklist. The transporting				



	Potentially Significant Impact	Less-Than- Significant Impact with Mitigation	Less-Than- Significant Impact	No Impact
and storage of materials to and from and within the project site is regulated to protect public safety and human health; however, potential impacts could occur. With the implementation of <b>Mitigation Measures HAZ-1</b> and <b>HAZ-2</b> agreed to by applicant, potentially significant impacts to human beings, either directly or indirectly, would be reduced to less than significant levels.				
c) <b>Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
A significant impact may occur if the proposed project has the potential to result in significant impacts, as discussed in the preceding sections. All potential impacts of the proposed project have been identified, and mitigation measures have been prescribed, where applicable, to reduce all potential impacts to less-than-significant levels. The proposed project would comply with all applicable permits, regulations, and other conditions imposed by the City of Carson and responsible agencies. Upon implementation of <b>Mitigation Measures HAZ-1</b> and <b>HAZ-2</b> along with compliance to applicable regulations, the proposed project would not result in substantial adverse impacts on human beings either directly or indirectly.				

### Mitigation Measures

- HAZ-1** An Emergency Action Plan (EAP) identifying the procedures for: 1) evacuating and accounting for visitors and employees, 2) dealing with a chemical release and other foreseeable emergencies could occur on-site, 3) notifying external agencies and emergency response personnel, and 4) administering first aid measures for chemical exposure shall be implemented for the proposed project.
- HAZ-2** A Hazardous Material Business Plan (HMBP) providing the information necessary for first responders to prevent or mitigate damage to public health and safety from the release of hazardous materials shall be prepared and submitted to the Los Angeles County Fire Department (LACFD), Health Hazardous Materials Division to aid in response efforts (facility and surrounding community) in the event of an emergency.





## Process Hazard Analysis



### **Inland Star Distribution Centers, Inc.**

2132 E Dominguez Street  
Carson, CA 90810

PSM RMP Solutions  
27525 Puerta Real, Suite 100-468  
Mission Viejo, CA 92691  
949-207-3397  
[www.psmrmptionsolutions.com](http://www.psmrmptionsolutions.com)

Study Date: July 12, 2016

Project Number: 2016-29

**EXHIBIT NO. 9 -**



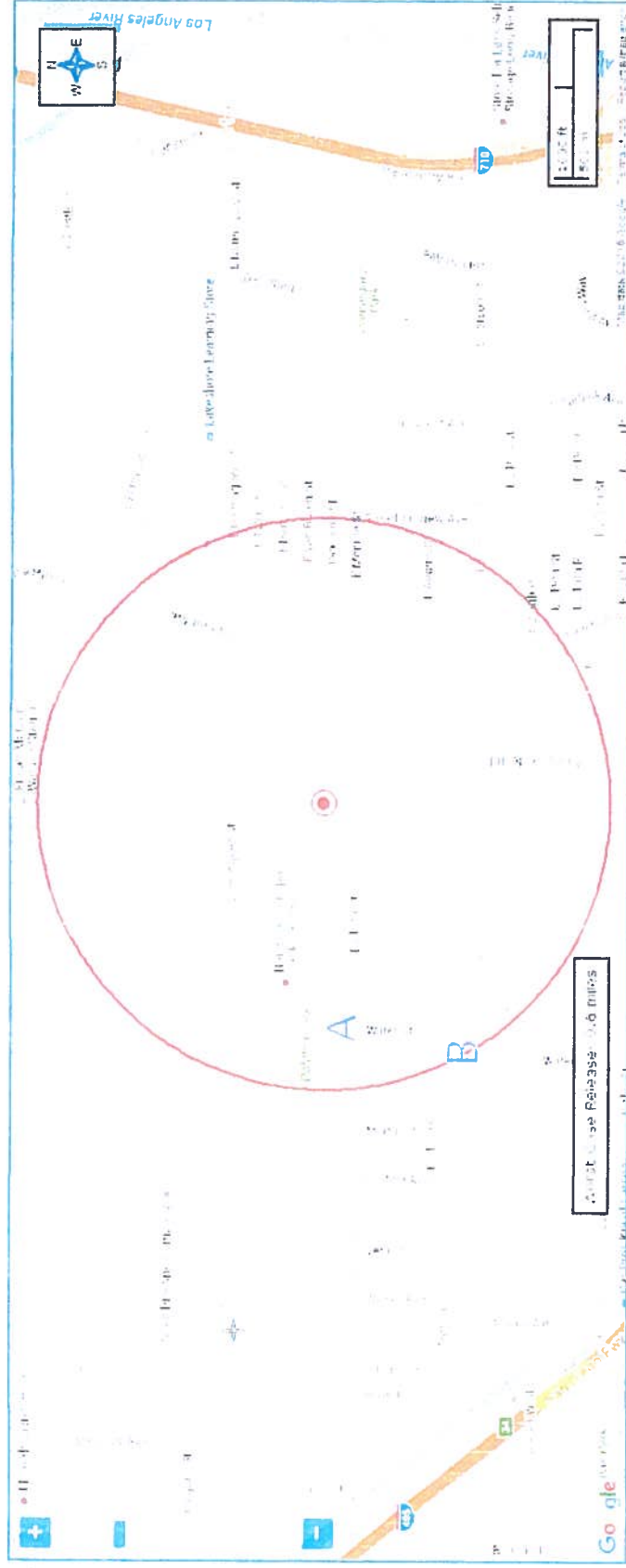


TABLE 1 Worst Case Offsite Consequence Analysis Parameters

Parameters	Worst Case
Chemical	Peracetic Acid
CAS #	79-21-0
Physical State	Liquid at Ambient Temperature
Toxic Endpoint*	1.5 ppm
Flammable Endpoint	N/A
Wind Speed	1.5 m/s
Atmospheric Stability Class	F
Ambient Temperature	77°F (25°C)
Humidity	50%
Height of Release	0 ft
Surface Roughness	Urban
Gas Density (279.7 K @ 1 atm)	5.2
Temp. of Released Chemical	77°F (25°C)
Mitigation	Building
Release Duration	10 mins
Release Rate	0.013 lbs/min
Quantity Released	82 lbs
Distance	0.6 miles (1 kilometer)
Population	2,126
Population (2 significant digits)	2,100

*NOT WORST CASE*

FIGURE 1 Worst Case Release Scenario (Peracetic Acid)



NEED "C"









### Inland Star Hazardous Materials, Chemical/Poisons storage timeline

1. CUP No. 978-15 was received on April 23, 2015;
2. On May 20, 2015 project was deemed incomplete identifying no submittal of Hazardous Materials Business Plan, no submittal of CEQA Initial Study;
3. On July 21, 2015 staff notified project consultant that project still incomplete;
4. On October 6, 2015, Business License approved in error;
5. On October 22, 2015, Planning Division advised Inland Star that the Planning Commission approval of CUP No. 978-15 was still pending and its decision would affect the business license final clearance;
6. On November 18, 2015, City Attorney re-confirmed the need for compliance with CEQA "Initial Study" requirements;
7. On November 21, 2015, City staff notified Inland Star consultant that a CEQA "Initial Study" was required as determined by the City Attorney;
8. On February 10, 2016, the LA County Fire Department/Health Hazardous Materials Division issued two (2) violation citations to Inland Star. Citation No. 1 that Inland Star **failed** to adequately establish and implement a Hazardous Materials Business Plan while storing/handling hazardous materials at or above the thresholds quantities of 55 gallons/500 lbs./200 cubic feet. Citation No. 2 that Inland Star failed to provide a Risk Management Plan and that the Fire Department Inspector observed that the health and safety of public receptors could be adversely impacted by an accidental release of Methyltrichlorosilane into the ambient air from Inland Star operation. The LA County Fire Department citation gave Inland Star until March of 2016 to submit the Risk Management Plan, Inland Star failed to submit the Risk Management Plan as required;
9. On June 1, 2016, staff received revised Hazardous Materials Business Plan and Risk Management Plan;
10. On June 7, 2016, Ky Truong, Public Safety Manager, and Anthony Rockhold, Code Enforcement Officer visited the subject site and issued a "cease and desist" notice;
11. On June 14, 2016, City staff met with Inland Star to discuss project deficiencies;
12. On June 29, 2016, City staff sent via certified mail "Notice of Incomplete" Conditional Use Permit Application No. 978-15;
13. On August 18, 2016, City staff sent via certified mail a "Notice to Reduce Regulated Chemicals to CalARP Thresholds" at Inland Star operation by September 1, 2016. Also attached were City Staff written comments on: CEQA Initial Study; the Hazardous Materials Business Plan and the Risk Management Plan.
14. On September 1, 2016, during a site inspection, Mr. Jim Dufour, Carson Building Inspector noticed that three storage racks had been installed without necessary Carson building permits and building inspection review/approval of the high-pile storage rack plans. Structural support deficiencies were noted on visual inspection of un-permitted storage racks.





## **Process Safety Management / Risk Management Program / California Accidental Release Prevention Program**

Prevention Programs

Technical Studies

Risk Management Plan



**INLAND STAR**  
DISTRIBUTION CENTERS

**Inland Star Distribution Centers, Inc.**

2132A East Dominquez Street

Carson, CA 90810

PSM RMP Solutions

27525 Puerta Real, Suite 100-468

Mission Viejo, CA 92691

(949) 207-3397

[www.psmrmptionsolutions.com](http://www.psmrmptionsolutions.com)

**EXHIBIT NO. 12**







# SAFETY DATA SHEET

DOW CORNING

## DOW CORNING(R) Z-1211 METHYLTRICHLOROSILANE

Version 1.3      Revision Date: 04/02/2015      MSDS Number: 926371-00004      Date of last issue: 03/03/2015  
Date of first issue: 12/10/2014

### SECTION 1. IDENTIFICATION

Product name : DOW CORNING(R) Z-1211 METHYLTRICHLOROSILANE

Product code : 000000000002969751

#### Manufacturer or supplier's details

Company name of supplier : Dow Corning Corporation

Address : South Saginaw Road  
Midland Michigan 48686

Telephone : (989) 496-6000

Emergency telephone : 24 Hour Emergency Telephone : (989) 496-5900  
CHEMTREC : (800) 424-9300

#### Recommended use of the chemical and restrictions on use

Recommended use : Intermediate

### SECTION 2. HAZARDS IDENTIFICATION

#### GHS Classification

Flammable liquids : Category 2

Acute toxicity (Oral) : Category 4

Acute toxicity (Inhalation) : Category 3

Acute toxicity (Dermal) : Category 4

Skin corrosion : Category 1

Serious eye damage : Category 1

#### GHS Label element

Hazard pictograms :



Signal Word : Danger

Hazard Statements : H225 Highly flammable liquid and vapor.  
H302 + H312 Harmful if swallowed or in contact with skin.  
H314 Causes severe skin burns and eye damage.  
H318 Causes serious eye damage.  
H331 Toxic if inhaled.



## SAFETY DATA SHEET

DOW CORNING

DOW CORNING(R) Z-1211  
METHYLTRICHLOROSILANE

Version	Revision Date:	MSDS Number:	Date of last issue:
1.3	04/02/2015	926371-00004	03/03/2015
			Date of first issue: 12/10/2014

## Precautionary Statements

: **Prevention:**

P210 Keep away from heat/sparks/open flames/hot surfaces.  
No smoking.

P233 Keep container tightly closed.

P240 Ground/bond container and receiving equipment.

P241 Use explosion-proof electrical/ ventilating/ lighting/ equipment.

P242 Use only non-sparking tools.

P243 Take precautionary measures against static discharge.

P261 Avoid breathing mist or vapors.

P264 Wash skin thoroughly after handling.

P270 Do not eat, drink or smoke when using this product.

P271 Use only outdoors or in a well-ventilated area.

P280 Wear protective gloves/ protective clothing/ eye protection/ face protection.

**Response:**

P301 + P312 + P330 IF SWALLOWED: Call a POISON CENTER or doctor/ physician if you feel unwell. Rinse mouth.

P301 + P330 + P331 IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.

P303 + P361 + P353 IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower.

P304 + P340 + P310 IF INHALED: Remove person to fresh air and keep comfortable for breathing. Immediately call a POISON CENTER or doctor/ physician.

P305 + P351 + P338 + P310 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/ physician.

P362 + P364 Take off contaminated clothing and wash it before reuse.

P370 + P378 In case of fire: Use alcohol-resistant foam, carbon dioxide or dry sand to extinguish.

**Storage:**

P403 + P235 Store in a well-ventilated place. Keep cool.

P405 Store locked up.

**Disposal:**

P501 Dispose of contents/ container to an approved waste disposal plant.

**Other hazards**

~~Reacts violently with water~~

~~Corrosive to the respiratory tract.~~

~~Vapors may form explosive mixture with air.~~

~~Static-accumulating flammable liquid.~~

Water Reactive

## SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance / Mixture : Substance

Substance name : Methyltrichlorosilane





## **MATERIAL SAFETY DATA SHEET**

### **1. Identification of the substance or mixture and of the supplier**

**GHS product identifier :** EPICHLOROHYDRIN

#### **Recommended use of the chemical and restrictions on use.**

- Recommended use: epoxy resins, Insect fumigant , synthetic resins, gums, cellulose esters and ethers, paints, varnishes, nail enamels and lacquers, cement for celluloid
- Restrictions on use: Use for recommended use.

#### **Supplier identifier.**

##### **- Manufacturers information**

- Manufacturers name: Hanwha Chemical Corporation
- Address:
  - 287-9, Pyeongyeo-Dong, Yeosu-si, Jeollanam-do, Korea (Yeosu plant)
- Emergency phone number:
  - Tel: +82-61-688-1864, +82-52-279-2323
- Respondent: ECH Production Team

##### **- Supplier information**

- Supplier name: Hanwha Chemical Corporation
- Address: Hanwha Building, 1, Janggyo-dong, Jung-gu, Seoul, Korea (CA department)
- Emergency phone number:
  - Tel: +82-2-729-1010
- Respondent: Chlorine Derivatives Sales Team

### **2. Hazards identification**

#### **GHS classification of the substance/mixture:**

- Flammable liquid: Category 3
- Acute toxicity (oral): Category 2
- Acute toxicity (dermal): Category 3
- Acute toxicity (inhalation: vapour): Category 2
- Skin corrosion/irritation: Category 1
- Eye Damage/Irritation: Category 1
- Respiratory sensitization: Category 1
- Skin sensitization: Category 1
- Carcinogenicity: Category 1B
- Mutagenicity: Category 1B
- Reproductive Toxicity: Category 2
- Specific target organ toxicity (single exposure): Category 1
- Specific target organ toxicity (repeated exposure): Category 1
- Aquatic toxicity(acute): Category 3

#### **GHS label elements, including precautionary statements.**

- Pictogram and symbol:







- Signal word: Danger
- Hazard statements:
  - H224 Extremely flammable liquid and vapor
  - H226 Flammable liquid and vapour
  - H300 Fatal if swallowed
  - H311 Toxic in contact with skin
  - H314 Causes severe skin burns and eye damage
  - H317 May cause an allergic skin reaction
  - H318 Causes serious eye damage
  - H330 Fatal if inhaled
  - H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled
  - H340 May cause genetic defects
  - H350 May cause cancer
  - H361 Suspected of damaging fertility or the unborn child
  - H370 Causes damage to respiratory organs
  - H372 Causes damage to organs through prolonged or repeated exposure
  - H402 Harmful to aquatic life
- Precautionary statements:
  - Precaution:
    - P201: Obtain special instructions before use.
    - P202: Do not handle until all safety precautions have been read and understood.
    - P210: Keep away from heat/sparks/open flames/hot surfaces. - No smoking
    - P233: Keep container tightly closed.
    - P240: Ground/bond container and receiving equipment.
    - P241: Use explosion-proof electrical/ventilating/light/equipment.
    - P242 Use only non-sparking tools please
    - P243: Take precautionary measures against static discharge.
    - P280: Wear protective gloves/protective clothing/eye protection/face protection.
    - P260+P261: Avoid breathing and Do not breathe dust/fume/gas/mist/ vapours/ spray.
    - P264: Wash thoroughly after handling.
    - P270: Do not eat, drink or smoke when using this product.
    - P271: Use only outdoors or in a well-ventilated area.
    - P272: Contaminated work clothing should not be allowed out of the workplace.
    - P284: Wear respiratory protection.
    - P280+P281: Wear protective gloves/protective clothing/eye protection/face protection. Use personal protective equipment as required.
    - P273: Avoid release to the environment.
  - Treatment:
    - P302+P352: IF ON SKIN: Wash with soap and water.
    - P303+P361+P353: IF ON SKIN: Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower.
    - P370+P378: In case of fire Use dry chemical, CO<sub>2</sub>, water spray or alcohol-resistant foam for extinction.
    - P301+P310: IF SWALLOWED: Immediately call a POISON CENTER or doctor/physician.
    - P310+P312: Immediately call a POISON CENTER or doctor/physician. Call a POISON CENTER or doctor/physician if you feel unwell.



## 5. Firefighting measures

### Suitable (and unsuitable) extinguishing media

- Suitable extinguishing media: Dry chemical, CO<sub>2</sub>, water spray or alcohol-resistant foam.
- Unsuitable extinguishing media: Do not use straight streams.
- In case of major fire and large quantities:
  - Water spray, fog or alcohol-resistant foam.
  - Move containers from fire area if you can do it without risk.
  - Dike fire-control water for later disposal; do not scatter the material.

### Tank/trailer/train truck fire:

- Fight fire from maximum distance or use unmanned hose holders or monitor nozzles.
- Cool containers with flooding quantities of water until well after fire is out.
- Withdraw immediately in case of rising sound from venting safety devices or discoloration of tank.
- ALWAYS stay away from tanks engulfed in fire.
- For massive fire, use unmanned hose holders or monitor nozzles; if this is impossible, withdraw from area and let fire burn.
- If tank, rail car or tank truck is involved in a fire, ISOLATE for 800 meters (1/2 mile) in all directions; also, consider initial evacuation for 800 meters (1/2 mile) in all directions.

### Specific hazards arising from the chemical

- Thermal decomposition products: Gas(hydrochloric acid, carbon monoxide, phosgene, irritating, corrosive and/or toxic vapour)

#### ★ → Fires and an explosion

- HIGHLY FLAMMABLE: Will be easily ignited by heat, sparks or flames.
- Vapors may form explosive mixtures with air.
- Runoff to sewer may create fire or explosion hazard.
- Vapors may travel to source of ignition and flash back.
- Most vapors are heavier than air. They will spread along ground and collect in low or confined areas (sewers, basements, tanks).
- Vapor explosion and poison hazard indoors, outdoors or in sewers.
- Containers may explode when heated.
- Ruptured cylinders may rocket.

### Special protective equipment and precautions for fire-fighters

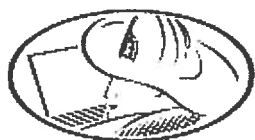
- Wear positive pressure self-contained breathing apparatus (SCBA).
- Wear chemical protective clothing that is specifically recommended by the manufacturer. It may provide little or no thermal protection.
- Move containers from fire area if fire occurs.
- If you can not move, Cool containers with flooding quantities of water.
- After put out fire, use unmanned hose holders or monitor nozzles.
- After put out fire, Cool containers with water.

## 6. Accidental release measures

### Personal precautions, protective equipment and emergency procedures:







# CAMEO Chemicals

Print

## Chemical Datasheet

### METHYLTRICHLOROSILANE



#### Chemical Identifiers

CAS Number	UN/NA Number	DOT Hazard Label	USCG CHRIS Code
75-79-6	1250	Flammable Liquid Corrosive	MTS

#### NFPA 704

Diamond	Hazard	Value	Description
3 4 2 W	Health	4	Can be lethal.
	Flammability	3	Can be ignited under almost all ambient temperature conditions.
	Instability	2	Readily undergoes violent chemical changes at elevated temperatures and pressures.
	Special	W	Reacts violently or explosively with water.

(NFPA, 2010)

#### NIOSH Pocket Guide

none

#### International Chem Safety Card

METHYLTRICHLOROSILANE

#### General Description

A colorless fuming liquid with a pungent odor. Flash point 8°F. Vapor and liquid may cause burns. Denser than water. Vapors are heavier than air.

#### Hazards

#### Reactivity Alerts

- Highly Flammable
- Water-Reactive
- Air-Reactive

#### Air & Water Reactions

179



Highly flammable. Fumes in air. Reacts violently with water, steam, moist air, alcohols, acetone, light metals with generation of heat and combustible (H<sub>2</sub>) and corrosive (HCl) gases. On contact with air it gives off HCl gas. [Handling Chemicals Safely 1980. p. 924]. Methyltrichlorosilane reacts vigorously with water to generate gaseous HCl. Based on a scenario where the chemical is spilled into an excess of water (at least 5 fold excess of water), half of the maximum theoretical yield of Hydrogen Chloride gas will be created in 1.4 minutes. Experimental details are in the following: "Development of the Table of Initial Isolation and Protective Distances for the 2008 Emergency Response Guidebook", ANL/DIS-09-2, D.F. Brown, H.M. Hartmann, W.A. Freeman, and W.D. Haney, Argonne National Laboratory, Argonne, Illinois, June 2009.

### Fire Hazard

Toxic hydrogen chloride and phosgene gases may form in fires. Reacts with water or steam to form hydrochloric acid. Vapor forms flammable mixture with air. May form explosive mixture in air. Avoid contact with water or moist air. (EPA, 1998)

### Health Hazard

*A* As with other chlorosilanes, acute exposures may be highly toxic and may cause death or permanent injury after very short exposures to small quantities. Chronic exposures may be moderately toxic and involve irreversible and reversible changes. Skin contact may produce severe burns with pain and risk of secondary infections. Ingestion may produce oral, esophageal, and stomach burns, intensity will vary from mild to very severe, gastrointestinal damage is rare but may occur. (EPA, 1998)

### Reactivity Profile

Chlorosilanes, such as METHYLTRICHLOROSILANE, are compounds in which silicon is bonded to from one to four chlorine atoms with other bonds to hydrogen and/or alkyl groups. Chlorosilanes react with water, moist air, or steam to produce heat and toxic, corrosive fumes of hydrogen chloride. They may also produce flammable gaseous H<sub>2</sub>. They can serve as chlorination agents. Chlorosilanes react vigorously with both organic and inorganic acids and with bases to generate toxic or flammable gases.

### Belongs to the Following Reactive Group(s)

- Chlorosilanes

### Potentially Incompatible Absorbents

Use caution: Liquids with this reactive group classification have been known to react with the absorbents listed below.

- Cellulose-Based Absorbents
- Mineral-Based & Clay-Based Absorbents
- Dirt/Earth

### Response Recommendations

### Isolation and Evacuation

Excerpt from ERG Guide 155 [Substances - Toxic and/or Corrosive (Flammable / Water-Sensitive)]:

As an immediate precautionary measure, isolate spill or leak area in all directions for at least 50 meters (150 feet) for liquids and at least 25 meters (75 feet) for solids.

SPILL: See ERG Table 1 - Initial Isolation and Protective Action Distances on the UN/NA 1250 datasheet.





**CITY OF CARSON  
PLANNING COMMISSION  
RESOLUTION NO.**

**A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF CARSON DENYING CONDITIONAL USE PERMIT NO. 978-15 FOR THE STORAGE OF HIGH-PILE REGULATED/NON-REGULATED, COMBUSTIBLE/FLAMMABLE HAZARDOUS CHEMICALS/POISONS WITHIN AN EXISTING 254,000-SQUARE-FOOT BUILDING LOCATED AT 2132-A EAST DOMINGUEZ STREET**

**THE PLANNING COMMISSION OF THE CITY OF CARSON, CALIFORNIA, HEREBY FINDS, RESOLVES AND ORDERS AS FOLLOWS:**

WHEREAS, an application was duly filed by the applicant, Inland Star, on behalf of the property owner, Prologis Corporation, with respect to real property located at 2132-A E. Dominguez Street, and described in Exhibit "A" attached hereto, requesting the approval of Conditional Use Permit No. 978-15 for the high-pile storage of regulated/non-regulated combustible/flammable hazardous chemicals/poisons within an existing 254,000-square-foot warehouse building.

WHEREAS, a Planning Commission meeting was duly held on September 27, 2016, and October 25, 2016 at 6:30 P.M. at City Hall, Council Chambers, 701 East Carson Street, Carson, California. A notice of time, place and purpose of the aforesaid meeting was duly given.

WHEREAS, evidence, both written and oral, was duly presented to and considered by the Planning Commission at the aforesaid meeting.

NOW THEREFORE, the Planning Commission hereby resolves as follows:

**Section 1.** The Planning Commission finds that:

- a) The proposed use is not consistent with the General Plan, which designates the subject property for Heavy Industrial use since the storing of toxic, combustible/flammable regulated/non-regulated chemicals/poisons in close proximity (less than half a mile) to sensitive receptors, including residential areas west of Wilmington Avenue and east of Alameda Street, Del Amo Elementary School, Dolphin Park, and the City's Corporate Yard housing its "First Response Emergency-Critical Team," would not be compatible with the intended character of the area. Potential adverse effects, namely, the high risk exposure to regulated and non-regulated chemicals and poisons that may be fatal if inhaled, are not justified by the benefits to the public interest which will occur as a result of the use.
- b) The proposed project has been operating without an approved Certificate of Occupancy by the Carson Building and Safety Official since March of 2015.
- c) The project applicant has installed high-pile racks for the storage of combustible/flammable regulated/non-regulated chemicals/poisons without approved engineering plans and without Carson Building permit approvals.
- d) The project applicant has been operating without an approved Conditional Use Permit since March of 2015.







- e) The project applicant failed to comply with two (2) violation citations from the Los Angeles County Fire Department/Health Hazardous Prevention/Petro Unit that required the preparation/implementation of a Hazardous Materials Business Plan and a Risk Management Plan by March of 2016, posing sensitive receptors within a half-mile distance to hazardous conditions from potential release of toxic regulated chemical/poisons of Methyltrichlorosilane, a regulated chemical/poison that may be fatal if inhaled. Sensitive receptors are Del Amo Elementary School, Dolphin Park, City Corporate Yard/First Response-Critical Team Center, residences west of Wilmington Avenue and east of Alameda Street.
- f) Operating without a valid business license, as required by CMC Section 6310 (a).
- g) On September 27, 2016, Inland Star made one last plea to the staff to continue the hearing to allow the applicant to provide the documents requested by the City such as the CEQA documentation, and Hazardous Materials Business Plan and Risk Management Plan.
- h) Inland Star asserted that they have engaged new consultants to complete these documents as the previous ones had failed to produce these document to staff's satisfaction.
- i) Staff in good faith recommended the continuance and the Commission granted another continuance to October 25, 2015.
- j) On October 12, 2016, the City Manager, the City Attorney, Community Development, and Public Safety Division staff met with the applicant and their representatives to discuss the proposed project and review the applicant's new submittals.
- k) In that meeting, Inland Star and their attorney stated that Inland Star's employees and consultants did not follow the City's procedures and did not submit the materials required and requested by staff to secure approval for their proposed operations because they had an employee in charge of the process who "did not know what he was doing" and he has since been dismissed from their organization.
- l) In that meeting, Inland Star conceded that a CUP should have been processed prior to their move to their facility and that they failed to apply for one with the City prior to being cited by Code Enforcement for operating a business without an approved CUP. They agreed they did not even discuss their potential use of the property with anyone at the City prior to entering into a lease and upgrading their facility.
- m) In that meeting, staff informed the applicant if they had consulted with staff prior to moving into the site, due to the close proximity of sensitive uses around the property, including a school and residential development, staff would have informed them this use is not an appropriate use for this location.



- n) In that meeting, Inland Star claimed that it has now hired a new team that it feels confident to prepare all documents necessary documents and follow the City's procedures.
- o) Inland Star also agreed in the meeting to remove storage of certain chemicals and poisons from its facility. The removal of such material necessitates the need for a new Risk Management Plan and Hazardous Materials Business Plan for staff to review as the base line changes. It also requires a new initial study and new information for same.
- p) Inland Star was told at that meeting to commence and finalize as soon as possible these new reports. Inland Star has also been informed to immediately turn over a complete and comprehensive list of all material it is currently storing or wants to be allowed to store (and quantities for same).
- q) In that meeting, Inland Star was informed that staff will need to analyze this new information before it can make any further recommendations to the Commission.
- r) The illegal operations of the Inland Star and the incompetence of its employees and consultants has put an undue burden on City staff as we have had to review the documents several times, have had to hold numerous meetings with Inland Star employees, management, and consultants to attempt to resolve the issues surrounding this complex project. It has also put an undue burden on City resources as both the City Attorney and City Prosecutor offices have been required to get involved.
- s) As result of lack of performance by Inland Star's employees, management, and consultants to provide accurate and complete information necessary to fully analyze the impacts of the project on the community, staff has lost confidence and trust in Inland Star's ability to provide the information necessary to analyze the project.

**Section 2.** Pursuant to Section 15369.5, Mitigated Negative Declaration of the California Environmental Quality Act (CEQA) Guidelines, a preliminary initial study was initiated but was not completed.

**Section 3.** Based on the aforementioned findings, the Commission hereby denies Conditional Use Permit No. 978-15 with respect to the property described in Section 1 hereof, subject to the conditions set forth in Exhibit "B" attached hereto.

**Section 4.** The Secretary shall certify to the adoption of the Resolution and shall transmit copies of the same to the applicant.



**Section 5.** This action shall become final and effective fifteen days after the adoption of this Resolution unless within such time an appeal is filed with the City Clerk in accordance with the provisions of the Carson Zoning Ordinance.

PASSED, APPROVED AND ADOPTED THIS 25<sup>th</sup> DAY OF October, 2016

\_\_\_\_\_  
CHAIRPERSON

ATTEST:

\_\_\_\_\_  
SECRETARY



**EXHIBIT A**  
**LEGAL DESCRIPTION**

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF CARSON, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

THAT PORTION OF LOT 2 IN BLOCK "B" OF THE SUBDIVISION OF PART OF THE RANCHO SAN PEDRO, IN THE CITY OF CARSON, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 1 PAGES 601 AND 602 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST CORNER OF SAID LOT 2; THENCE NORTH 89 DEGREES 59 MINUTES 05 SECONDS EAST ALONG THE NORTHERLY LINE OF SAID LOT 649.51 FEET; THENCE SOUTH 17 DEGREES 11 MINUTES 17 SECONDS WEST PARALLEL WITH THE WESTERLY LINE OF SAID LOT 2, 1369.10 FEET TO A POINT ON A LINE WITH AND 15.00 FEET NORTHERLY MEASURED AT RIGHT ANGLES, FROM THE SOUTHERLY LINE OF SAID LOT 2; THENCE SOUTH 89 DEGREES 56 MINUTES 37 SECONDS WEST ALONG SAID PARALLEL LINE, 40.53 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE NORTHEASTERLY AND HAVING A RADIUS OF 443.594 FEET; THENCE NORTHWESTERLY ALONG THE ARC OF LAST DESCRIBED CURVE, THROUGH AN ANGLE OF 93 DEGREES 09 MINUTES 01 SECONDS, 721.19 FEET TO A POINT IN THE EASTERLY LINE OF THAT CERTAIN STRIP OF LAND, 20 FEET WIDE, DESCRIBED IN THE DEED RECORDED IN BOOK 31615 PAGE 346 OF OFFICIAL RECORDS IN THE OFFICE OF SAID RECORDER AND IN BOOK 31593 PAGE 204 OF OFFICIAL RECORDS IN THE OFFICE OF SAID RECORDER; THENCE NORTH 10 DEGREES 23 MINUTES 59 SECONDS EAST 135.36 FEET TO A POINT IN THAT CERTAIN COURSE DESCRIBED IN THE DEED RECORDED IN BOOK 38652 PAGE 200 OF OFFICIAL RECORDS, IN THE OFFICE OF SAID RECORDER, AS HAVING A LENGTH OF 308.00 FEET, SAID POINT BEING EASTERLY 4.00 FEET, MEASURED AT RIGHT ANGLES, FROM THE WESTERLY LINE OF SAID LOT 2; THENCE SOUTH 89 DEGREES 59 MINUTES 05 SECONDS WEST ALONG SAID CERTAIN COURSE 4.19 FEET TO THE WESTERLY LINE OF SAID LOT 2; THENCE NORTH 17 DEGREES 11 MINUTES 11 SECONDS EAST, ALONG SAID WESTERLY LINE 740.21 FEET TO THE POINT OF BEGINNING.

EXCEPTING THEREFROM, FROM A PORTION OF THE ABOVE DESCRIBED LAND, AN UNDIVIDED ONE-HALF INTEREST IN AND TO ALL MINERALS, OIL, GAS AND HYDROCARBON SUBSTANCES, LYING BELOW 500 FEET OF THE SURFACE OF SAID PARCEL OF LAND; PROVIDED THAT GRANTORS, THEIR HEIRS AND ASSIGNS, SHALL NOT HAVE THE RIGHT OF ENTRY IN, UPON OR OVER THE SURFACE OF SAID LAND, NOR IN, UPON OR OVER THE PORTION OF SAID LAND LYING WITHIN 500 FEET OF THE SURFACE THEREOF, AS RESERVED BY HARRY R. WILSON AND JEANETTE AVANT, ALSO KNOWN AS JEANETTE REIFSNYDER, AS TRUSTEES OF THE ROBERT A. WILSON, JR. TRUST, CREATED UNDER THE ESTATE OF ROBERT A. WILSON, DECEASED, CASE NO. 255975, SUPERIOR COURT LOS ANGELES, AND EDWARD E. WILSON, JR., HARRY R. WILSON, JEANETTE A. REIFSNYDER, ALSO KNOWN AS JEANETTE A. AVANT, AND CALVIN D. WILSON, IN DEED RECORDED IN BOOK 38652 PAGE 200, OFFICIAL RECORDS.

ALSO EXCEPTING THEREFROM, FROM A PORTION OF THE ABOVE DESCRIBED LAND, AN UNDIVIDED ONE-HALF (1/2) INTEREST IN AND TO ALL MINERALS, OIL, GAS AND HYDROCARBON SUBSTANCES LYING BELOW 500 FEET OF THE SURFACE OF SAID LAND, WITHOUT THE RIGHT OF ENTRY IN, UPON OR OVER THE SURFACE OF SAID LAND, NOR IN, UPON OR OVER THE PORTION OF SAID LAND, LYING WITHIN 500 FEET OF THE SURFACE, AS RESERVED BY SOUTHERN PACIFIC COMPANY, A CORPORATION IN DEED RECORDED IN BOOK 55552 PAGE 201, OFFICIAL RECORDS.

ALSO EXCEPTING THEREFROM, FROM A PORTION OF THE ABOVE DESCRIBED LAND, THE TITLE AND EXCLUSIVE RIGHT TO ONE HALF (1/2) OF THE MINERALS AND MINERALS ORES OF EVERY KIND AND CHARACTER NOW KNOWN TO EXIST OR HEREAFTER DISCOVERED UPON, WITHIN OR UNDERLYING SAID LAND OR THAT MAY BE PRODUCED THEREFROM, INCLUDING, WITHOUT LIMITING THE GENERALITY OF THE FOREGOING, ALL PETROLEUM, OIL, NATURAL GAS AND OTHER HYDROCARBON SUBSTANCES AND PRODUCTS DERIVED THEREFROM, TOGETHER WITH THE EXCLUSIVE AND PERPETUAL RIGHT OF INGRESS



**EXHIBIT A**  
(Continued)

AND EGRESS BENEATH THE SURFACE OF SAID LAND TO EXPLORE FOR, EXTRACT, MINE AND REMOVE THE SAME, AND TO MAKE SUCH USE OF THE SAID LAND BENEATH THE SURFACE AS IS NECESSARY OR USEFUL IN CONNECTION THEREWITH, WHICH USE MAY INCLUDE LATERAL OR SLANT DRILLING, BORING, DIGGING OR SINKING OF WELLS, SHAFTS OR TUNNELS; PROVIDED, HOWEVER, THAT SAID GRANTOR, ITS SUCCESSORS AND ASSIGNS, SHALL NOT USE THE SURFACE OF SAID LAND IN THE EXERCISE OF ANY OF SAID RIGHT, AND SHALL NOT DISTURB THE SURFACE OF SAID LAND OR ANY IMPROVEMENTS THEREON, AS RESERVED BY SOUTHERN PACIFIC COMPANY, A CORPORATION, IN DEED RECORDED JANUARY 8, 1968 AS INSTRUMENT NO. 601. IN BOOK D3878 PAGE 530, OFFICIAL RECORDS.

APN: 7316-026-024, 7316-026-025



ALTA



ELIZABETH A. CAMACHO  
Senior Counsel

10100 Santa Monica Blvd.  
Suite 2200  
Los Angeles, CA 90067

Direct 310.282.2075  
Main 310.282.2000  
Fax 310.510.6735  
ecamacho@loeb.com

October 11, 2016

Elena Q. Gerli  
Assistant City Attorney  
City of Carson  
Aleshire & Wynder, LLP  
2361 Rosecrans Ave., Suite 475  
El Segundo, CA 90245

Re: Conditional Use Permit No. 978-15 (2132-A E. Dominguez Street)

Dear Ms. Gerli:

On behalf of Inland Star Distribution Centers ("Inland Star"), the applicant for Conditional Use Permit No. 978-15, I would like to thank City staff for making itself available to meet with Inland Star's representatives this Wednesday, October 12, 2016. In an effort to maximize the use of our meeting time, I am writing to provide background information for your review.

I would like to preface my letter by offering my client's sincere regret and apology for its lapse and delay in completing the CUP. Inland Star understands its obligations to comply with the City's zoning code, and always intended to work with the City to comply with all CUP requirements. Inland Star has been transparent and forthright with respect to its operations in the City of Carson from the very beginning, reaching out to the City in 2014 to describe its operations and its intent to seek the required CUP. The CUP application was filed in April, 2015, well before Inland Star began moving packaged chemicals to the site in October, 2015. However, as discussed further below, due to limitations and some confusion on the part of Inland Star's previous consultant team, the CUP process went off-track, and although Inland Star management stepped in to correct the situation in June, 2016, it appears that new misunderstandings may have arisen. It is our hope to bridge information gaps, understand any unmet requirements or continuing concerns, and work with staff to find a path forward.

#### Inland Star's Operations and Proposed CUP

Inland Star's current project description is set forth in the August 31, 2016 Initial Study provided to staff in early September, 2016. Inland Star seeks a CUP for a high-piled, non-regulated, combustible, flammable and hazardous storage facility at 2132-A East Dominguez Street (the "Project Site"). The Project Site is located within an established industrial park adjacent to other heavy industrial uses. The Project Site and surrounding uses are designated as Heavy Industrial in the City's General Plan and are zoned M-H (Manufacturing Heavy).

## EXHIBIT NO. 14

Los Angeles New York Chicago Nashville Washington, DC Beijing Hong Kong [www.loeb.com](http://www.loeb.com)

For the United States offices, a limited liability partnership including professional corporations. For Hong Kong office, a limited liability partnership.

10800983.2  
226511-10002





The existing warehouse facility receives, stores, and ships various packaged chemicals and industrial materials for manufactures and distributors. Inland Star's services are limited to storage, shipping and receiving. Inland Star's operations do not include blending, mixing, formulating, transferring materials from one container to another, or opening of containers. Inland Star's licensed and certified fire protection engineers pre-approve all materials based on a thorough review and analysis of each product to ensure that the warehouse infrastructure is compliant to store the materials. All materials are received in approved Department of Transportation (DOT) packaging. Material is stored in pallet racking or floor stack schemes.

Inland Star seeks a CUP for the receipt, storage and shipment of non-regulated and regulated chemicals and industrial materials that fall into the following three classifications established by the 2013 Editions of the California Building Code (CBC) and the California Fire Code (CFC):

- Group S-1 occupancy for non-regulated (non-hazardous) material and materials under the Maximum Allowable Quantity permitted by the CBC;
- Group H-3 occupancy for primarily flammable and combustible liquids and flammable solids; and
- Group H-4 occupancy for corrosive and toxic materials ("poisons").

The existing building was originally constructed in 1989. In 2015, prior to moving any materials to the Carson site, Inland Star invested over \$3 million to upgrade the existing building and its systems to meet – and exceed – the stringent building and fire code requirements for the types of chemicals to be stored in the warehouse, including the addition of H-3 and H-4 occupancy areas for the storage of flammables and oxidizers (H-3) and corrosives and poisons (H-4). As shown in the site plan attached as Exhibit A hereto, Inland Star has improved the existing warehouse facility with four segregated storage rooms, each of which is designed to house one of the three CBC/CFC classifications of material. Area A is designed to house S-1 occupancy materials (85,248 square feet), Area B and Area C are each designed to house H-3 occupancy materials (28,450 square feet total), and Area D is designed to house H-4 occupancy materials (46,687 square feet). Each of the four areas has a distinct, state-of-the-art fire suppression system that has been carefully engineered to protect the types of materials to be stored in that area.

In addition to complying with applicable CBC and CFC requirements, based on an independent fire and risk evaluation, Inland Star installed multiple safety features including a 2,500 gallons per minute (gpm) firewater booster pump, a second water service line to provide a redundant water service to the project site in the event the main service line and/or the supplemental water pressure pump fails, and fire suppression/extinguishing sprinkler systems throughout the building including foam-water sprinkler systems in the Group H-3 areas. An early suppression fast response (ESFR) system was installed in portions of the warehouse building. Twenty minutes of containment of fire suppression water is provided through a series of impermeable curbing and barriers in the Group H-3 and Group H-4 areas. With these improvements, Inland Star's system exceeds the CFC requirements for water volume and required fire protection schemes. The fire protection schemes for the protection of flammable or combustible liquids also meet the applicable requirements of the 2015 Edition of the National Fire Protection





Association (NFPA) Code. The NFPA is a global nonprofit organization that promulgates codes and standards for international use by partnering with industrial fire experts and interested agencies.

Both the City Building & Safety Division and Los Angeles County Fire Department inspected and signed off on all upgrades, and issued permits for (1) flammable and combustible liquids; (2) hazardous materials; and (3) high-pile storage. See **Exhibit B**. Neither the City, the County Fire Department nor any other agency has asserted that there is any inadequacy with the physical warehouse or its systems for storage of the types of packaged chemicals on site.

Although Inland Star initially did not believe that a new certificate of occupancy was required, once Inland Star became aware of this requirement it sought to apply for one and pay the required fee. The City declined to issue a new certificate of occupancy, however, because Inland Star does not yet have the required CUP.

#### Inland Star's Compliance with State and County Requirements

While Inland Star still requires approval of a CUP, it is also important to note that Inland Star has met applicable health and safety requirements for its operations to the satisfaction of the Los Angeles County Fire Department, which is charged with administering state requirements regulating hazardous materials.

On August 11, 2016 the Los Angeles County Fire Department issued an Annual Unified Program Facility Permit for Inland Star's Carson facility. See **Exhibit C**. This permit is issued by Los Angeles County Fire Department only after submission of the Hazardous Materials Business Plan and Risk Management Plan, which Inland Star has provided. Los Angeles County Fire has also provided written confirmation that it has found Inland Star's Risk Management Program to be in reasonable compliance with applicable regulations. See **Exhibit D**. The County has also accepted the Hazardous Materials Business Plan that Inland Star submitted in July 2016.<sup>1</sup> As discussed above, Los Angeles County Fire has also issued permits to Inland Star for flammable and combustible liquids, hazardous materials and high-pile storage. See **Exhibit B**.

#### The September 27, 2016 Staff Report

While it is not the purpose of this letter to respond in detail to each of the points raised in the September 27, 2016 staff report, it is important to note that the report does not accurately reflect Inland Star's efforts to comply with City requirements. Indeed, the report and staff's recommendation took Inland Star by surprise, as it has complied in good faith with the City's requests and believed that the City was working cooperatively with Inland Star to address outstanding issues.

While Inland Star accepts responsibility for its lapses and delays with respect to the CUP, it is important to note that it was transparent from the very beginning, and, once Inland Star management became aware that its previous consultant team was not able to meet the CUP and other applicable requirements, has moved quickly and consistently to address each

<sup>1</sup> Inland Star submitted a revised Hazardous Materials Business Plan to the County in September, 2016.





requirement with diligence and professionalism. Inland Star applied for its CUP in April, 2015, well before it began moving packaged chemical material to the Carson site in October, 2015 (not March as stated in the staff report). A public hearing was scheduled for late 2015 but then was postponed after confusion arose regarding the requirements for compliance with the California Environmental Quality Act ("CEQA") and it was determined that an Initial Study was required. In June 2016, Inland Star management became aware of significant shortcomings and inadequacies with the efforts made by the previously engaged team to conclude the Initial Study and other documents. Inland Star then moved quickly to address the situation. It immediately hired a new consultant team, submitted the necessary plans and materials, and dedicated top management staff to overseeing all efforts. In July, 2016, Inland Star submitted to the City drafts of all requested materials, i.e., the CEQA Initial Study, the Risk Management Plan and the Hazardous Materials Business Plan. The City provided comments on these documents on August 18, 2016, and Inland Star addressed these comments and provided revised documents to the City on September 6, 2016.

Unfortunately, however, the staff report does not reflect Inland Star's consistently responsive behavior since June. For example, Exhibit 11 to the staff report provides a "timeline" that includes only the City's communications to Inland Star and does not include any of Inland Star's many responses and efforts to comply.

The staff report also incorrectly states that Inland Star failed to comply with the August, 2016 instruction by the City Prosecutor to reduce levels of certain chemicals below the applicable reporting thresholds set by the California Accidental Release Program ("CalARP"). The CalARP requirements do not prohibit the use or storage of any chemicals, but establish thresholds that trigger documentation and reporting requirements with the Certified Unified Program Agency (CUPA), which is the Los Angeles County Health Hazardous Materials Division. Although Inland Star complied with the CalARP reporting requirements in its July submissions to LA County, it nonetheless accepted the City's instruction that all CalARP chemicals are to remain below the reporting threshold while the CUP is being processed. Indeed, Inland Star went further and not only reduced these chemicals below the reporting threshold but removed them from the Carson site in their entirety by the City's deadline of September 1, 2016. The staff report's assertion that Inland Star "did not comply with Carson's Prosecutor's letter to notify the City in writing" that it had reduced [CalARP] substances to levels below the CalARP reporting thresholds" is simply incorrect. (Staff Report at p. 4). At the September 1, 2016 inspection, Inland Star provided City staff with the written bills of lading showing the transfer of all of these chemicals outside the City of Carson. In addition, in its September 6, 2016 letter (attached hereto as Exhibit E), Inland Star specifically stated that "[a]s you observed during the City's re-inspection on September 1<sup>st</sup>, Inland Star removed all CalARP and PSM regulated chemicals from our facility by close of business on August 31. The bills of lading for these shipments that we provided you in hard copy, depict the precise materials, quantities, carriers, dates and destinations." Far from indicating disregard for City requirements, Inland Star responded by exceeding the City's instruction in less than two weeks, and timely documenting its compliance. Inland Star's response is particularly significant given the lack of suitable alternative storage facilities for such materials in Los Angeles County, and the need to look elsewhere to safely house these chemicals.



The staff report also incorrectly asserts that Inland Star failed to obtain permits for high-pile storage racks for storing "combustible/flammable" and "regulated/non-regulated chemicals/poisons." (Staff Report pp. 6-7). Inland Star does have a high-pile permit (see Exhibit B). Inland Star did add some additional racking that was not shown on the approved building plans, but these additional racks are located only in the "non-regulated" area of its facility (Area A). Accordingly, this additional racking is not, and never would be, used to store "combustible/flammable" material, or "poisons" which are stored only in Areas B, C and D. The additional racks are fully compliant with all applicable codes. Inland Star does acknowledge the need to have the additional racks approved through the City's building permit process and has attempted to submit permit applications, but was told the City would not accept the application pending discussions with the Planning Department. However, Inland Star's delay in obtaining updated building permits for these racks is an oversight, not an indication that Inland Star is flouting laws designed to protect health and safety.

Contrary to the picture painted by the staff report, Inland Star is a solid operator, with a strong reputation in its industry, a culture of compliance and the utmost regard for health and safety. Inland Star is a long-time member of the American Chemistry Council (ACC), and was the first third party warehouse provider in the world to be Responsible Care Management System (RCMS) certified. We understand that there are only five warehouses in the world today with this certification. Inland Star operated the same type of packaged chemical warehouse nearby in Rancho Dominguez for 15 years without incident. The facility it has created in Carson is truly state-of-the-art, and with its individualized fire suppression systems provides the safest storage location for the industrial chemicals that are relied upon by so many businesses in Carson and the region. Indeed, the Mitigated Negative Declaration (Exhibit 8 to the staff report) concludes that "there will not be a significant effect [on the environment] in this case," because adequate mitigation has been provided. That mitigation, the preparation of an Emergency Action Plan and a Hazardous Materials Business Plan, have been prepared and provided to the appropriate agencies, and to our knowledge the City has not identified any current deficiencies in these plans.

Because there are very few packaged chemical warehouse facilities in the region (and none in Carson) that offer the same high degree of protection for these materials, Inland Star has few true competitors. The reality is that curtailing Inland Star's operation would *increase* the risk to health and safety in Carson and the surrounding area, as chemical manufacturers, distributors and end-users would be faced with few options, and thus more likely to store hazardous material illegally in warehouses with nowhere near the necessary protections.

Inland Star and the City have had an unfortunate start, and Inland Star once again offers its sincere regret for the lapse and delay in completing the CUP. However, this lapse occurred under the supervision of individuals who are no longer associated with Inland Star, and since upper management became involved in June, Inland Star's response has been diligent, timely and thorough. Inland Star, together with its new consultant team, has every intention of





Elena Gerli, Esq.  
October 11, 2016  
Page 6

achieving full compliance with all CUP requirements and other applicable regulations, and addressing any concerns of staff as quickly as possible. We look forward to discussing these issues with you and answering your questions at the meeting on October 12, 2016.

Sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth A. Camacho', with a long horizontal flourish extending to the right.

Elizabeth A. Camacho  
Senior Counsel

cc: Michael Kelton  
Michael O'Donnell  
Mr. Ken Farfsing, City Manager  
Ms. Sunny Soltani, City Attorney

10800983.2  
226511-10002

A handwritten mark, possibly 'A20', enclosed within a hand-drawn triangle.



September 6, 2016

Mr. Zak Gonzalez  
Associate Planner  
City of Carson  
701 East Carson Street  
Carson, CA 90745

via email: [ZGonzalez@carson.ca.us](mailto:ZGonzalez@carson.ca.us)

Dear Zak:

Inland Star has revised our previously submitted CUP NO. 978-15 documents to reflect the August 18, 2016 comments we received from you and Ky Truong, on our CEQA Initial Study, Hazardous Material Business Plan and Risk Management Plan. Soft copies are enclosed with this correspondence.

To help facilitate your review of the updates, we prepared a summary of responses that correspond with your August 18<sup>th</sup> comments. This is file name: "Response to Comments - No CalARP Chemicals – Final 8-31-16".

As you observed during the City's re-inspection on September 1<sup>st</sup>, Inland Star removed all CalARP and PSM regulated chemicals from our facility by close of business August 31<sup>st</sup>. The bills of lading for these shipments that we provided you in hard copy, depict the precise materials, quantities, carriers, dates and destinations. These are enclosed in file name: "Bills of Lading – CalARP chemicals removed". In addition, on August 29, 2016, Inland Star submitted a CalARP Risk Management Program De-Registration Form to Michael Whitehead, Hazardous Material Specialist III, CalARP unit, LACFD Health Hazardous Material Division.

During the re-inspection meeting at our facility on September 1<sup>st</sup>, you commented concern that Inland Star did not "notify the City in writing when and where the excess chemicals/poisons that exceed CalARP thresholds were moved/re-stored upon removal" and that "the City did not visually inspect the removal and visually confirm that the new location of the chemical is not within the City of Carson" [page 2 of Glen Tucker's August 18, 2016 letter to Inland Star]. There was not time to coordinate hour-to-hour written communication about materials shipping from our facility 12-hours per day. Inland Star was focused on executing dynamics amongst several customers to exceed the City's demand. However, during the re-inspection, we showed the City the warehouse locations the material in question used to reside.






September 6, 2016  
Zak Gonzalez  
Page II

Inland Star's Initial Study / Mitigated Negative Declaration has been updated in file name: Carson Warehouse IS – MND Final 8-31-16. Also enclosed, is the red-line markup document that highlight the edits and revisions. This is file name: "Carson Warehouse IS – MND Final 8-31-16 (Redline)".

Lastly, Bill Dicky, Senior Building Inspector had previously performed most of the building inspections and approvals at Inland Star's Carson facility over the past 2-years. We just learned that Inspector Dicky retired. We appreciate the City of Carson having Inspector Jim Dufour, City of Carson Building and Safety, being present at the September 1<sup>st</sup> inspection as we look forward to working with Inspector Delfour on the go-forward. For transparency, Inland Star has had some facility rack configuration modifications pending that may not be noted on the last plans approved by Inspector Dicky. We will let you know as to the status on this front once we get the latest from our rack provider who also orchestrates engineering specifications and inspections.

Please let us know if there is anything additional that you require.

Sincerely,



Mike O'Donnell  
Senior Executive Vice President  
Tel: 310-604-6430  
Cell: 949-292-4317  
[modonnell@inlandstar.com](mailto:modonnell@inlandstar.com)

cc via email:

Ken Farfsing, City Manager  
Cecil Rhambo, Assistant City Manager  
John Raymond, Director Community Development  
Jose Gomez, Fire Captain, LACFD Petroleum Chemical Unit  
Michael Whitehead, Hazardous Material Specialist III, CalARP unit,  
LACFD Health Hazardous Material Division  
Jeanna Emmons, Owner / Senior Compliance Specialist, PSM RMP Solutions  
Kevin Ferrier, Senior Planner, Terry A. Hayes Associates, Inc.  
Maryam Tanif-Abbasi, Regional Officer, State Dept. of Toxic Substances Control  
Saied Naaseh, Planning Manager, Planning Division  
Ky Truong, Public Safety Manager  
Zak Gonzalez, Associate Planner  
Anthony Rockhold, Code Enforcement Officer  
Glen Tucker, City of Carson City Prosecutor



September 6, 2016  
Zak Gonzalez  
Page III

cc via email continued:

Sunny Soltani, City Attorney  
Chris Neumeyer, Assistant City Attorney  
Lauren A. Lyman, Deputy City Director  
Jim Dufour, Building and Safety Inspector  
Michael Kelton, Chairman/CEO, Inland Star  
Kim Shirkey, Vice President Finance & Administration, Inland Star  
Daniel Alvarado, General Manager, Operations, Inland Star

*Enclosures:*

- *Initial Study/Mitigated Negative Declaration update*
- *Initial Study/Mitigated Negative Declaration - Redline*
- *Response to Comments on no CalARP chemicals*
- *Hazardous Material Business Plan*
- *Emergency Action Plan*
- *Hot Work Permit Program*
- *Incident Investigation*
- *CalARP Deregistration Form*
- *Bills of Lading for CalARP chemical shipments removed from building*

AZS

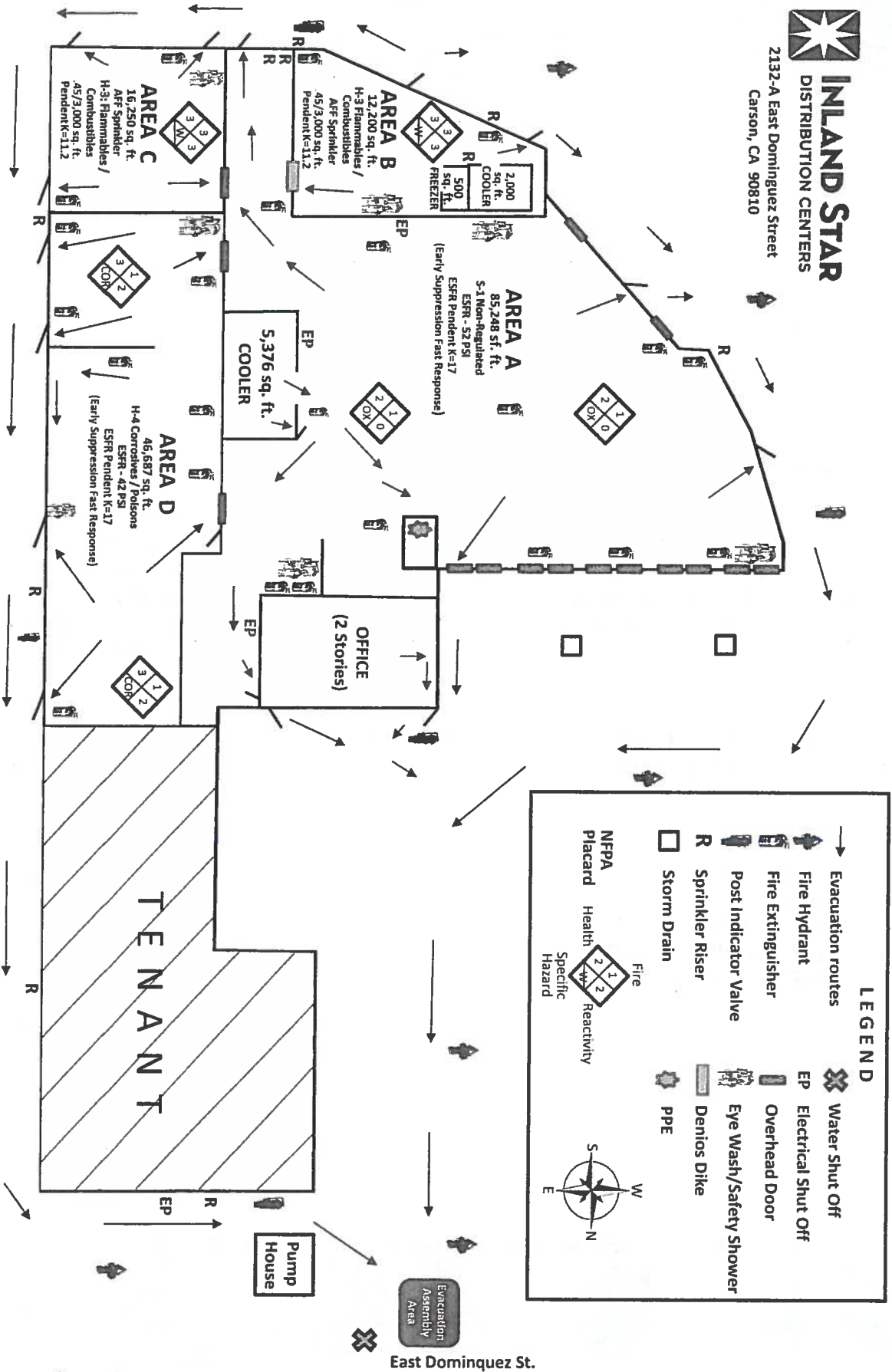
# LOCATION MAP

South Wilmington Avenue



**INLAND STAR**  
DISTRIBUTION CENTERS

2132-A East Dominguez Street  
Carson, CA 90810



East Dominguez St.

A2



## COUNTY OF LOS ANGELES

### FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294  
(323) 881-2401

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

September 14, 2016

Daniel Alvarado, General Manager  
Inland Star Distribution Centers  
2132-A Dominguez St.  
Carson, CA 90810

Dear Mr. Alvarado:

Michael Whitehead, Hazardous Materials Specialist III, reviewed the initial risk management plans (RMP) from Inland Star Distribution Centers, Inc., for the chemical distribution process and determined reasonable compliance with California Code of Regulations, Title 19, Public Safety, Division 2 Office of Emergency Services, Chapter 4.5, California Accidental Release Prevention Program. With respect to the RMP Review Process in §2745.2 of this chapter, the RMP will be available for public review to take into account any comments from the public on the RMP.

If you have any questions, please contact Michael Whitehead at (323) 890-4109 or [michael.whitehead@fire.lacounty.gov](mailto:michael.whitehead@fire.lacounty.gov)

Sincerely,

WALTER UROFF, ASSISTANT CHIEF  
SPECIAL OPERATIONS SECTION  
HEALTH HAZARDOUS MATERIALS DIVISION

WU:mw

#### SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS  
ARTESIA  
AZUSA  
BALDWIN PARK  
BELL  
BELL GARDENS  
BELLFLOWER

BRADBURY  
CALABASAS  
CARSON  
CERRITOS  
CLAREMONT  
COMMERCE  
COVINA

CUDAHY  
DIAMOND BAR  
DUARTE  
EL MONTE  
GARDENA  
GLEN DORA  
HAWAIIAN GARDENS

HAWTHORNE  
HIDDEN HILLS  
HUNTINGTON PARK  
INDUSTRY  
INGLEWOOD  
IRVINDALE  
LA CANADA-FLINTRIDGE

LA HABRA  
LA MIRADA  
LA PUENTE  
LAKEWOOD  
LANCASTER  
LAWNDALE  
LOMITA

LYNWOOD  
MALIBU  
MAYWOOD  
NORWALK  
PALMDALE  
PALOS VERDES ESTATES  
PARAMOUNT

PICO RIVERA  
POMONA  
RANCHO PALOS VERDES  
ROLLING HILLS  
ROLLING HILLS ESTATES  
ROSEMEAD  
SAN DIMAS  
SANTA CLARITA

SIGNAL HILL  
SOUTH EL MONTE  
SOUTH GATE  
TEMPLE CITY  
WALNUT  
WEST HOLLYWOOD  
WESTLAKE VILLAGE  
WHITTIER





LOS ANGELES COUNTY CERTIFIED UNIFIED PROGRAM AGENCY  
ADMINISTERED BY LOS ANGELES COUNTY FIRE DEPARTMENT

**ANNUAL UNIFIED PROGRAM FACILITY PERMIT**

**Fiscal Year 2015-2016**

Expires June 30, 2016

ISSUED TO: GARRY CHAPMAN  
INLAND STAR DISTRIBUTION CENTERS, INC.  
PO BOX 2396  
FRESNO, CA 93745

LA Co. CUPA NO. AR: AR0066288

FACILITY OWNER: INLAND STAR DISTRIBUTION CENTERS, INC.  
FACILITY SITE ADDRESS: 2132 E DOMINGUEZ ST #A, CARSON, CA 90810

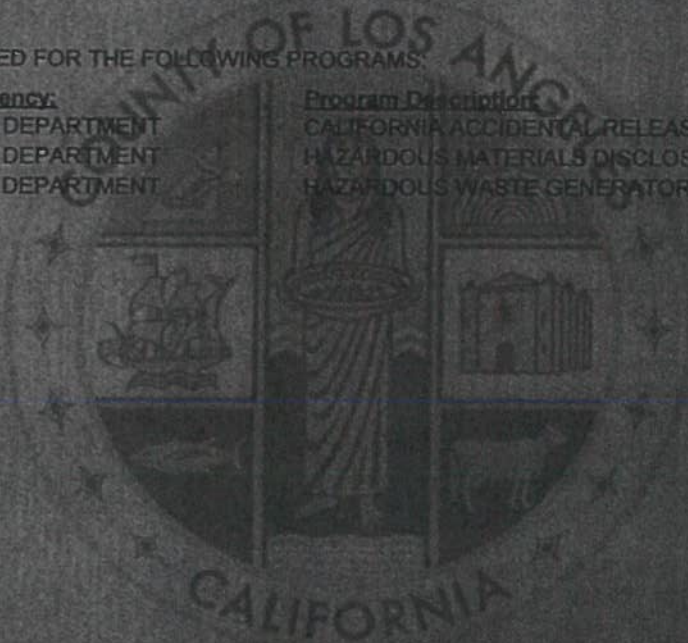
THIS PERMIT IS ISSUED FOR THE FOLLOWING PROGRAMS:

Administering Agency:

LA COUNTY FIRE DEPARTMENT  
LA COUNTY FIRE DEPARTMENT  
LA COUNTY FIRE DEPARTMENT

Program Description:

CALIFORNIA ACCIDENTAL RELEASE PROGRAM (CALARP)  
HAZARDOUS MATERIALS DISCLOSURE PROGRAM  
HAZARDOUS WASTE GENERATOR PROGRAM



**THIS PERMIT MUST BE CONSPICUOUSLY DISPLAYED  
AT THE FACILITY AT ALL TIMES.**

ISSUED BY: Daryl L. Osby  
County of Los Angeles Fire Chief

ISSUED ON: Aug 11, 2016

This permit is valid only for the above location and is subject to ALL REQUIREMENTS of State and local laws and regulations.  
This permit is non-transferable and is void upon change in ownership or location.

If you are in operation on or after July 1, 2016, your business will be responsible for payment of permit fees for the fiscal year ending July 1, 2016. You may continue to operate after June 30, 2016 under this permit until the payment for fiscal year 2016-2017 is made to this Department by the established fee schedule date.

A28



# COUNTY OF LOS ANGELES



## FIRE DEPARTMENT

### PERMIT

Permission is hereby granted to the permittee listed below in accordance with the Los Angeles County Fire Code (Title 32) for the following type of condition:

**FLAMMABLE AND COMBUSTIBLE LIQUIDS**

This permit is non-transferable and is granted until revoked or expired. This permit is subject to revocation for proper cause including violation of the Fire Code, related laws or submission of false information. This permit including attached items must be kept on the premises and must be readily available for inspection.

Permittee Name: Inland Star

Address: 2132 Dominguez Street

Date Issued: 12-30-15

Date Effective: 12-30-15

Agent Signature: [Signature]

Agent Name: Gary Chapman

Phone: 310- -

City: Carson

Zip Code: 90810

Station: 95

BN: 7

Date Expired: 12-30-18

Inspector Signature: [Signature]

Inspector Name: Marvin Baldwin

Attach additional information to clearly indicate the scope, conditions and limitations that approval is being granted under this permit. This permit is valid only if the permitted condition remains within the limitations and restrictions shown on the approved attached drawings, plans, photographs, lists, and requirement sheets.



# COUNTY OF LOS ANGELES FIRE DEPARTMENT

## PERMIT

Permission is hereby granted to the permittee listed below in accordance with the Los Angeles County Fire Code (Title 32) for the following type of condition:

### HAZARDOUS MATERIALS

This permit is non-transferable and is granted until revoked or expired. This permit is subject to revocation for proper cause including violation of the Fire Code, related laws or submission of false information. This permit including attached items must be kept on the premises and must be readily available for inspection.

Permittee Name: Inland Star

Address: 2132 Dominguez Street

Date Issued: 12-30-15

Date Effective: 12-30-15

Agent Signature: [Signature]

Agent Name: Gary Chapman

Phone: 310- -

City: Carson

Zip Code: 90810

Station: 95

BN: 7

Date Expired: 12-30-18

Inspector Signature: [Signature]

Inspector Name: Marvin Baldwin

Attach additional information to clearly indicate the scope, conditions and limitations that approval is being granted under this permit. This permit is valid only if the permitted condition remains within the limitations and restrictions shown on the approved attached drawings, plans, photographs, lists, and requirement sheets.



# COUNTY OF LOS ANGELES



## FIRE DEPARTMENT

### PERMIT

Permission is hereby granted to the permittee listed below in accordance with the Los Angeles County Fire Code (Title 32) for the following type of condition:

HIGH-PILE STORAGE

This permit is non-transferable and is granted until revoked or expired. This permit is subject to revocation for proper cause including violation of the Fire Code, related laws or submission of false information. This permit including attached items must be kept on the premises and must be readily available for inspection.

Permittee Name: Inland Star

Phone: 310- -

Address: 2132 Dominguez Street

City: Carson

Zip Code: 90810

Date Issued: 12-30-15

Station: 95

BN: 7

Date Effective: 12-30-15

Date Expired: 12-30-18

Agent Signature: Gary Chapman

Inspector Signature: Marvin Baldwin

Agent Name: Gary Chapman

Inspector Name: Marvin Baldwin

Attach additional information to clearly indicate the scope, conditions and limitations that approval is being granted under this permit. This permit is valid only if the permitted condition remains within the limitations and restrictions shown on the approved attached drawings, plans, photographs, lists, and requirement sheets.





ELIZABETH A. CAMACHO  
Senior Counsel

10100 Santa Monica Blvd.  
Suite 2200  
Los Angeles, CA 90067

Direct 310.282.2075  
Main 310.282.2000  
Fax 310.510.6735  
ecamacho@loeb.com

RECEIVED

SEP 29 2016

September 26, 2016

COMMUNITY DEVELOPMENT  
DEPARTMENT

Mr. John Raymond  
Director of Community Development  
City of Carson  
701 E. Carson Street  
Carson, California 90745

Re: Conditional Use Permit No. 978-15 (2132-A E. Dominguez Street)

Dear Mr. Raymond:

We represent Inland Star Distribution Centers ("Inland Star"), the applicant for Conditional Use Permit No. 978-15 and write to request that the City continue the Planning Commission hearing for this item, scheduled for Tuesday, September 27, 2016, in order to allow time for Inland Star to meet with City staff to respond to the issues raised in the staff report that it issued last Thursday afternoon.

Sincerely,

Elizabeth A. Camacho  
Senior Counsel

cc: Michael Kelton  
Michael O'Donnell  
Mr. Ken Farfsing, City Manager  
Mayor Albert Robles  
Mr. Zak Gonzalez, Associate City Planner  
Ms. Sunny Soltani, City Attorney  
Mr. Glen Tucker, City Prosecutor



Rene Russell

---

**From:** Rene Russell  
**Sent:** Monday, September 26, 2016 4:09 PM  
**To:** 'arobles@carson.ca.us'; 'ZGonzale@carson.ca.us'; 'modonnell@inlandstar.com'; 'gtucker@awattorneys.com'; 'mkelton@inlandstar.com'; 'kfarfsing@carson.ca.us'; 'ssoltani@awattorneys.com'  
**Cc:** Elizabeth Camacho  
**Subject:** Inland Star Distribution Centers Request to Continue September 27, 2016 Planning Commission Hearing  
**Attachments:** Inland Star\_Request City Continue Planning Commission Hearing for Tuesday, September 27, 2016.pdf

Dear Recipients:

Attached please find the above-subject correspondence of this date.

Sincerely,

rrr

On behalf of Elizabeth A. Camacho, Esq.



# LOCATION MAP

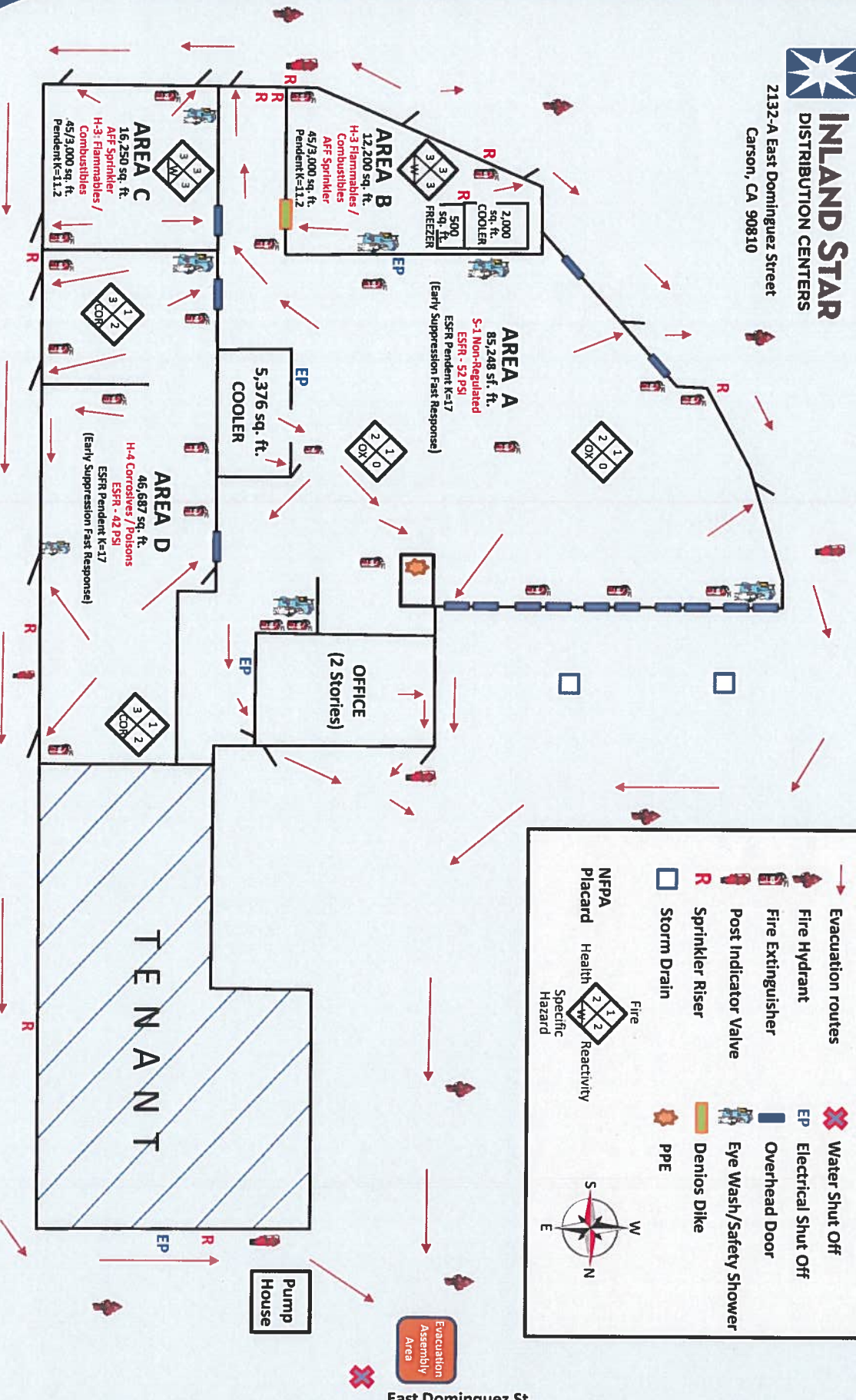
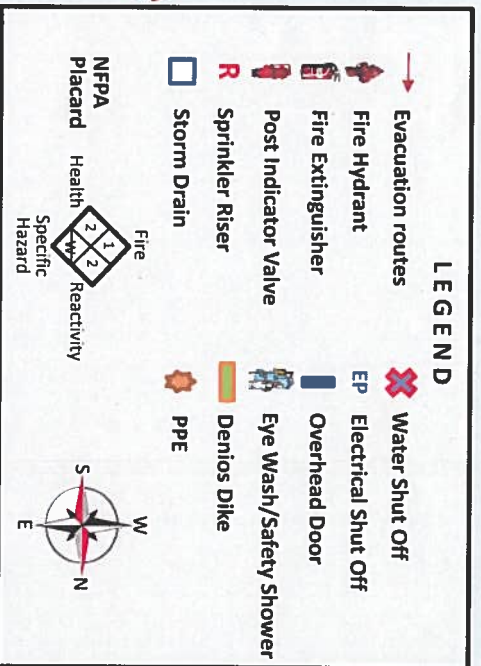
South Wilmington Avenue



**INLAND STAR**  
DISTRIBUTION CENTERS

2132-A East Dominguez Street  
Carson, CA 90810

## LEGEND



East Dominguez St.

