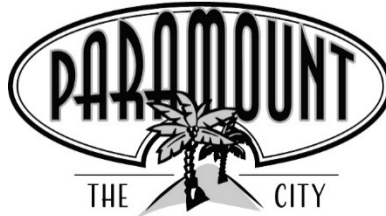


AGENDA

Paramount Planning Commission

July 1, 2026



Safe, Healthy, and Attractive

Regular Meeting
City Hall Council Chamber
6:00 p.m.

City of Paramount

16400 Colorado Avenue ♦ Paramount, CA 90723 ♦ (562) 220-2000 ♦ www.paramountcity.gov

PUBLIC PARTICIPATION NOTICE

In-person Attendance: The public may attend the Planning Commission meetings in-person.

Public Comments: Members of the public wanting to address the Planning Commission, either during public comments or for a specific agenda item, or both, may do so by the following methods:

- **In-person**

If you wish to make a statement, please complete a Speaker's Card prior to the commencement of the Public Comments period of the meeting. Speaker's Cards are located at the entrance. Give your completed card to a staff member and when your name is called, please go to the podium provided for the public.

- **E-mail:** planning@paramountcity.gov

E-mail public comments must be received **15 minutes prior to the start of the meeting**. The e-mail should specify the following information: 1) Full Name; 2) City of Residence; 3) Phone Number; 4) Public Comment or Agenda Item No.; 5) Subject; 6) Written Comments.

All public comments are limited to a maximum of three (3) minutes unless an extension is granted. No action may be taken on items not on the agenda except as provided by law. All public comments will be recorded and rules of decorum and procedures for the conduct of City meetings will apply when addressing the Planning Commission whether in-person or via email.

CALL TO ORDER: Chair Linda Timmons

PLEDGE OF ALLEGIANCE: Chair Linda Timmons

ROLL CALL OF MEMBERS: Commissioner Ernie Esparza
Commissioner Javier Gonzalez
Commissioner David Moody
Vice Chair Gordon Weisenburger
Chair Linda Timmons

MINUTES

1. [APPROVAL OF MINUTES](#) June 3, 2026

PUBLIC COMMENTS

NEW BUSINESS

PUBLIC HEARINGS

2. [CONDITIONAL USE PERMIT NO. 1000](#) A request by Abraham Cendejas Arambula/A&B Atelier Builders for Francisco Villa Cortes/Master Rooter and Plumbing, Inc. to operate a plumbing and sewer service with nine service trucks at 7757 Jackson Street in the M-2 (Heavy Manufacturing) zone. This project is a Class 3 (new construction or conversion of small structures) Categorical Exemption pursuant to Article 19, Section 15303 of California Environmental Quality Act (CEQA) Guidelines.
3. [CONDITIONAL USE PERMIT NO. 1001](#) A request by Castle Metals, Inc. to allow the expansion of existing precision metal cutting and polishing within an existing 246,878 square foot building and add chemical milling at 14001 Orange Avenue in the M-2 (Heavy Manufacturing) zone. This project is a Class 1 (Existing Facilities) Categorical Exemption pursuant to Article 19, Section 15301 of the California Environmental Quality Act (CEQA) Guidelines.

REPORTS

4. [ORAL REPORT](#) City Council Actions

COMMENTS

5. [COMMENTS](#)
 - City Attorney
 - Commissioners
 - Staff

ADJOURNMENT

To a meeting on Wednesday, August 5, 2026, at 6:00 p.m. in the Council Chamber at City Hall, 16400 Colorado Avenue, Paramount, California.

Americans with Disabilities Act: In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the City Clerk's office at (562) 220-2225 at least 48 hours prior to the meeting to enable the City to make reasonable arrangements to ensure accessibility to this meeting. **Note:** Agenda items are on file in the Planning and Building Department office and are available for public inspection during normal business hours. Materials related to an item on this Agenda submitted after distribution of the agenda packet are also available for public inspection during normal business hours in the Planning and Building Department office. The Planning and Building Department office is located at City Hall, 16400 Colorado Avenue, Paramount.

JULY 1, 2026

APPROVAL OF MINUTES
PLANNING COMMISSION

MOTION IN ORDER:

APPROVE THE PLANNING COMMISSION MINUTES OF JUNE 3, 2026.

MOTION:

MOVED BY: _____

SECONDED BY: _____

[] APPROVED

[] DENIED

ROLL CALL VOTE:

AYES: _____

NOES: _____

ABSENT: _____

ABSTAIN: _____

PARAMOUNT PLANNING COMMISSION MINUTES JUNE 3, 2026

City of Paramount, 16400 Colorado Avenue, Paramount, CA 90723

CALL TO ORDER: The meeting of the Planning Commission was called to order by Chair Linda Timmons at 6:01 p.m. at City Hall, Council Chamber, 16400 Colorado Avenue, Paramount, California.

ROLL CALL OF COMMISSIONERS: Present: Commissioner Ernie Esparza
Commissioner Javier Gonzalez
Commissioner David Moody
Vice Chair Gordon Weisenburger
Chair Linda Timmons

Absent: None

STAFF PRESENT: Lindsay Thorson, Planning Commission Attorney
John King, Planning and Building Director
Monica Rodriguez, Assistant Planning and Building Director
Ivan Reyes, Building and Housing Manager
Tara Reyes, Management Analyst
Leslie Corrales, Assistant Planner
Caitlin Au, Planning Intern
Biana Salgado, Administrative Assistant

MINUTES

1. **APPROVAL OF MINUTES**
May 6, 2026

Chair Timmons presented the Planning Commission minutes of May 6, 2026 for approval.

It was moved by Commissioner Esparza and seconded by Commissioner Gonzalez to approve the minutes as presented. The motion was passed by the following roll call vote:

AYES: Commissioners Esparza, Gonzalez and Moody;
Vice Chair Weisenburger; and Chair Timmons
NOES: None
ABSENT: None
ABSTAIN: None

PUBLIC COMMENTS

Planning and Building Director King stated that there was an emailed public comment related to Agenda Item No. 5.

NEW BUSINESS

PUBLIC HEARINGS

**2. CONDITIONAL USE
PERMIT NO. 997**

Chair Timmons announced the item, a request by Jeff Grodsky/Maio and Grodsky, Inc. for Super Kids Dental to operate a dental office at 16239 Paramount Boulevard, Suites A and B in the PD-PS (Planned Development with Performance Standards)/Town Center West zone.

Planning and Building Director King introduced Assistant Planning and Building Director Rodriguez, who provided an overview of the request.

Chair Timmons asked for clarification of the formerly occupied businesses in the office/retail suites and if the number of restrooms was sufficient for this type of business.

Assistant Planning and Building Director Rodriguez stated that presented was a preliminary floor plan and if there is a need for more restrooms, it would be addressed through the Building and Safety Division plan check process.

Chair Timmons opened the public and called for public testimony.

Chair Timmons asked if the applicant would like to come up to the podium to speak.

Linda Brown, Healthcare Broker with LDM Commercial, spoke in favor of the request.

There being no further comments in favor or opposed to the request, it was moved by Vice Chair Weisenburger, seconded by Commissioner Moody, to close the public hearing. The motion was passed by the following roll call vote:

AYES: Commissioners Esparza, Gonzalez, and Moody;
Vice Chair Weisenburger; and Chair Timmons
NOES: None
ABSENT: None
ABSTAIN: None

It was moved by Commissioner Gonzalez, seconded by Commissioner Esparza, to adopt Planning Commission Resolution No. PC 26:017, "A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF PARAMOUNT

SETTING FORTH ITS FINDINGS OF FACT AND DECISION RELATIVE TO CONDITIONAL USE PERMIT NO. 997, A REQUEST BY JEFF GRODSKY/MAIO AND GRODSKY, INC. FOR SUPER KIDS DENTAL FOR A CONDITIONAL USE PERMIT (CUP) TO ALLOW THE OPERATION OF A DENTAL OFFICE AT 16239 PARAMOUNT BOULEVARD, SUITES A AND B IN THE PD-PS (PLANNED DEVELOPMENT WITH PERFORMANCE STANDARDS)/TOWN CENTER WEST ZONE", approving Conditional Use Permit No. 997. The motion was passed by the following roll call vote:

AYES: Commissioners Esparza, Gonzalez, and Moody;
Vice Chair Weisenburger; and Chair Timmons
NOES: None
ABSENT: None
ABSTAIN: None

3. CONDITIONAL USE
PERMIT NO. 998

Chair Timmons announced the item, a request by Rocco Tregnaghi/ROADS Foundation to operate a medical office at 16260 Paramount Boulevard in the PD-PS (Planned Development with Performance Standards)/Town Center East zone.

Planning and Building Director King introduced Assistant Planner Corrales, who provided an overview of the request.

Chair Timmons opened the public hearing and called for public testimony.

Applicant Rocco Tregnaghi spoke in favor of the request.

Chair Timmons asked if the medical office would offer mental health services.

Mr. Tregnaghi clarified that while their organization provides mental health services at other medical offices in neighboring cities, the Paramount location will not offer mental health services.

There being no further comments in favor or opposed to the request, it was moved by Vice Chair Weisenburger, seconded by Commissioner Gonzalez, to close the public hearing. The motion was passed by the following roll call vote:

AYES: Commissioners Esparza, Gonzalez, and Moody;
Vice Chair Weisenburger; and Chair Timmons
NOES: None
ABSENT: None
ABSTAIN: None

It was moved by Vice Chair Weisenburger, seconded by Commissioner Esparza, to adopt Planning Commission Resolution No. PC 26:018, "A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF PARAMOUNT SETTING FORTH ITS FINDINGS OF FACT AND DECISION RELATIVE TO CONDITIONAL USE PERMIT NO. 998, A REQUEST BY ROCCO TREGNAGHI/ROADS FOUNDATION INC. FOR A CONDITIONAL USE PERMIT (CUP) TO OPERATE A MEDICAL CLINIC AT 16260 PARAMOUNT BOULEVARD IN THE PD-PS (PLANNED DEVELOPMENT WITH PERFORMANCE STANDARDS)/TOWN CENTER EAST ZONE", approving Conditional Use Permit No. 998. The motion was passed by the following roll call vote:

AYES: Commissioners Esparza, Gonzalez, and Moody;
Vice Chair Weisenburger; and Chair Timmons
NOES: None
ABSENT: None
ABSTAIN: None

4. CONDITIONAL USE
PERMIT NO. 999

Chair Timmons announced the item, a request by MDC Campers and Caravans, Inc. to operate a warehouse and light assembly of premanufactured customized parts for travel trailers with limited outdoor storage at 16400 Garfield Avenue in the M-2 (Heavy Manufacturing) zone.

Planning and Building Director King introduced Assistant Planner Corrales, who provided an overview of the request.

Commissioner Gonzalez asked for clarification of the business operations of the proposed business.

Chair Timmons opened the public hearing and called for public testimony.

Representing the applicant, Regina Tuitasi, Operations Manager for MDC Campers and Caravans, Inc., spoke in favor of the request.

There being no further comments in favor or opposed to the request, it was moved by Vice Chair Weisenburger, seconded by Commissioner Gonzalez, to close the public hearing. The motion was passed by the following roll call vote:

AYES: Commissioners Esparza, Gonzalez, and Moody;
Vice Chair Weisenburger; and Chair Timmons
NOES: None
ABSENT: None
ABSTAIN: None

It was moved by Commissioner Gonzalez, seconded by Commissioner Esparza, to adopt Planning Commission Resolution No. PC 26:019, "A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF PARAMOUNT SETTING FORTH ITS FINDINGS OF FACT AND DECISION RELATIVE TO CONDITIONAL USE PERMIT NO. 999, A REQUEST BY MDC CAMPERS AND CARAVANS, INC. FOR A CONDITIONAL USE PERMIT (CUP) TO OPERATE AN TO ALLOW THE OPERATION OF A WAREHOUSE AND LIGHT ASSEMBLY OF PREMANUFACTURED CUSTOMIZED PARTS FOR TRAVEL TRAILERS WITH LIMITED OUTDOOR STORAGE AT 16400 GARFIELD AVENUE IN THE M-2 (LIGHT MANUFACTURING) ZONE.", approving Conditional Use Permit No. 999. The motion was passed by the following roll call vote:

AYES: Commissioners Esparza, Gonzalez, and Moody;
Vice Chair Weisenburger; and Chair Timmons
NOES: None
ABSENT: None
ABSTAIN: None

RECEIVE AND FILE

5. CONDITIONAL USE
PERMIT NO. 921 –
Second Three-Month
Review of Mr. J's Bar
Business Operations

Chair Timmons announced the item.

Planning and Building Director King introduced Building and Housing Manager Reyes, who provided an overview of the second three-month review of Mr. J's Bar business operations at 7824 Alondra Boulevard in the C-3 (General Commercial) zone. On May 27, 2026, Planning staff conducted a second site visit and found the business is still in compliance with the conditions of approval.

A written correspondence expressing concerns about this item was received from Susan Alcaraz, 15915 Colorado Avenue. A copy of the correspondence was provided to each Commissioner.

Further discussion took place between the Planning Commission, staff, and business owner Alfredo Lopez regarding the item.

The Planning Commission received and filed the review.

REPORTS

6. ORAL REPORT
City Council Actions

Planning and Building Director King stated that City Council adopted the Clearwater Specific Plan project on May 26, 2026 and will take effect in 30 days.

COMMENTS

7. COMMENTS

Planning and Building Director King announced the grand opening and ribbon cutting for Sprouts Farmers Market will take place Friday, June 5, 2026 at 6:30 a.m.

Planning and Building Director King introduced Tara Reyes, the new Management Analyst for the Planning and Building Department.

The Planning Commission congratulated and welcomed Management Analyst Reyes to the team.

ADJOURNMENT

There being no further business to come before the Commission, the meeting was adjourned by Chair Timmons at 6:54 p.m. to the next Planning Commission meeting to be held on Wednesday, July 1, 2026 at City Hall Council Chamber, 16400 Colorado Avenue, Paramount, California at 6:00 p.m.

Linda Timmons, Chair

ATTEST:

Biana Salgado, Administrative Assistant

JULY 1, 2026

PUBLIC HEARING

CONDITIONAL USE PERMIT NO. 1000

- A. HEAR STAFF REPORT.
- B. OPEN THE PUBLIC HEARING.
- C. HEAR TESTIMONY IN THE FOLLOWING ORDER:
 - (1) THOSE IN FAVOR
 - (2) THOSE OPPOSED
 - (3) REBUTTAL BY THE APPLICANT
- D. MOTION TO CLOSE THE PUBLIC HEARING.

<u>MOTION:</u>	<u>ROLL CALL VOTE:</u>
MOVED BY: _____	AYES: _____
SECONDED BY: _____	NOES: _____
[] APPROVED	ABSENT: _____
[] DENIED	ABSTAIN: _____

- E. MOTION IN ORDER:
READ BY TITLE ONLY, WAIVE FURTHER READING, AND ADOPT
PLANNING COMMISSION RESOLUTION NO. PC 26:020, APPROVING
A REQUEST BY ABRAHAM CENDEJAS ARAMBULA/A&B ATELIER
BUILDERS FOR FRANCISCO VILLA CORTES/MASTER ROOTER AND
PLUMBING, INC. TO OPERATE A PLUMBING AND SEWER SERVICE
WITH NINE SERVICE TRUCKS AT 7757 JACKSON STREET IN THE M-
2 (HEAVY MANUFACTURING) ZONE.

CONTINUED... PLEASE TURN PAGE

MOTION:

MOVED BY: _____

SECONDED BY: _____

[] APPROVED

[] DENIED

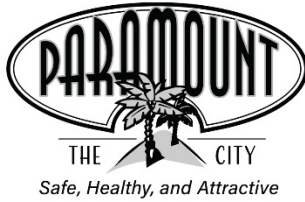
ROLL CALL VOTE:

AYES: _____

NOES: _____

ABSENT: _____

ABSTAIN: _____



CITY OF PARAMOUNT PLANNING DEPARTMENT STAFF REPORT SUMMARY

PROJECT NUMBER:	Conditional Use Permit No. 1000
REQUEST:	Operate a plumbing and sewer service with nine service trucks.
APPLICANT:	Abraham Cendejas Arambula/A&B Atelier Builders for Francisco Villa Cortes/Master Rooter and Plumbing, Inc.
MEETING DATE:	July 1, 2026
LOCATION:	7757 Jackson Street
ZONE:	M-2 (Heavy Manufacturing)
GENERAL PLAN:	Industrial
PLANNER:	Monica Rodriguez
RECOMMENDATION:	Approval



To: Honorable Planning Commission

From: John King, AICP, Planning and Building Director

By: Monica Rodriguez, Assistant Planning and Building Director

Date: July 1, 2026

**Subject: CONDITIONAL USE PERMIT NO. 1000
ABRAHAM CENDEJAS ARAMBULA/A&B ATELIER BUILDERS FOR
FRANCISCO VILLA CORTES/MASTER ROOTER AND PLUMBING, INC.**

BACKGROUND

This application is a request by Abraham Cendejas Arambula/A&B Atelier Builders for Francisco Villa Cortes/Master Rooter and Plumbing, Inc. to approve Conditional Use Permit (CUP) No. 1000, a request to allow the operation of a plumbing and sewer service business with nine service trucks at 7757 Jackson Street in the M-2 (Heavy Manufacturing) zone.

Later this evening, the Development Review Board will review Development Review Application (DRA) No. 26:006 related to the construction of a two-story, 19,390 square foot warehouse and office building to accommodate the proposed use.

DISCUSSION

The subject site is a rectangular lot measuring 20,000 square feet in size. The subject site is situated on the north side of Jackson Street, at the terminus of the cul-de-sac west of the Jackson Street and Vermont Avenue intersection. The subject site abuts M-2 (Heavy Manufacturing) zoned properties to the north and south, M-1 (Light Manufacturing) zoned properties to the east, and the Union Pacific Railroad to the west.

In conjunction with the proposed use, the applicant is proposing to construct a 19,390 square foot warehouse and office building to operate a plumbing and sewer service business with nine service vehicles.

Master Rooter and Plumbing, Inc. has been in operation since 2014. In 2017, the business relocated to a warehouse facility at 7028 Marcelle Street in the City of Paramount, and later moved to 7018 Jackson Street, where it continues to operate today. The business owner of Master Rooter and Plumbing, Inc. has successfully maintained and grown the business and wishes to remain in the City of Paramount. To support this goal, the business owner has purchased the property at 7757 Jackson Street and is requesting approval to operate a plumbing and sewer service business.

Master Rooter and Plumbing, Inc. employs eight staff members, including seven field employees and one office employee. The proposed office hours are Monday through Friday, from 6:30 a.m. to 3:00 p.m. The warehouse building will not be open to the public. Employees will park their personal vehicles onsite, load necessary tools and materials onto company fleet vehicles, and then deploy to offsite job locations. Fleet vehicles may occasionally return during the day to collect additional tools or materials. At the end of the workdays, employees will return no later than 7:00 p.m. to exchange vehicles.

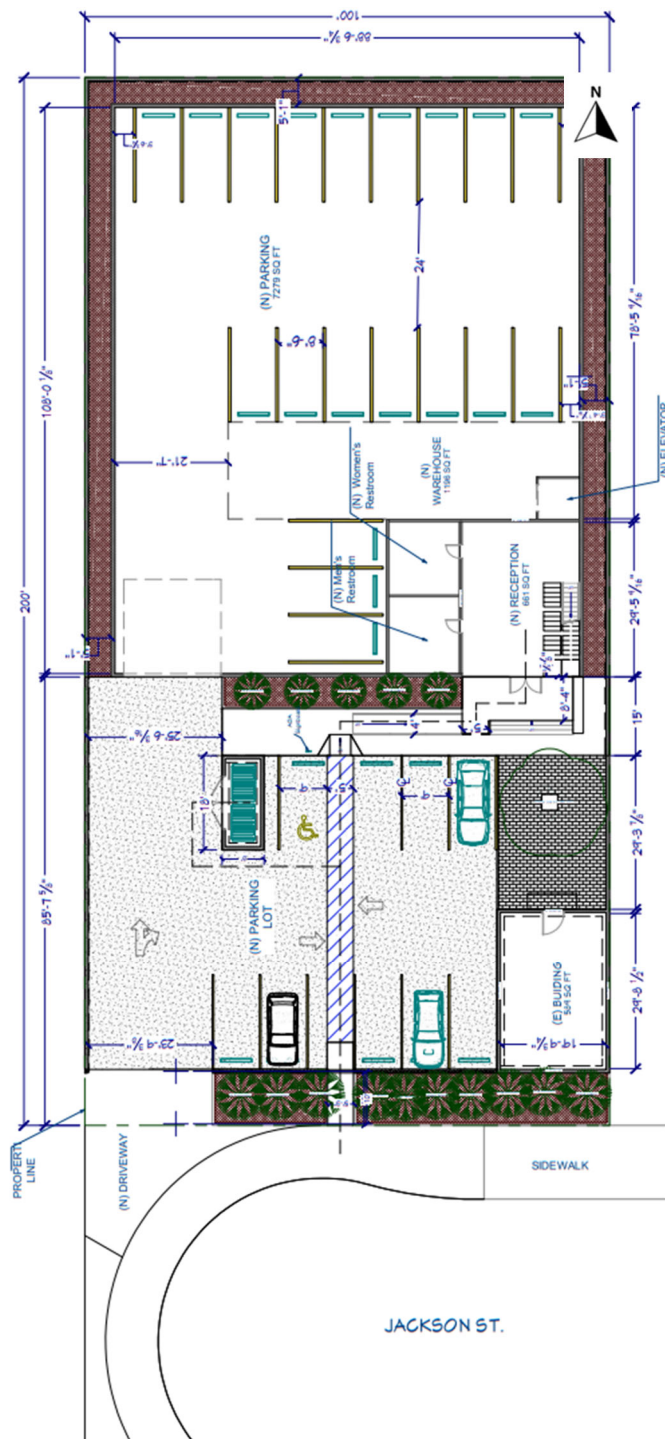
The vehicles are equipped with specialized, high-value equipment, including robotic excavation tools, hydro-jetting systems, and sewer inspection cameras. Therefore, all fleet vehicles, trailers, and excavators will be stored inside the warehouse building. A photo of the fleet vehicles is provided below for reference.



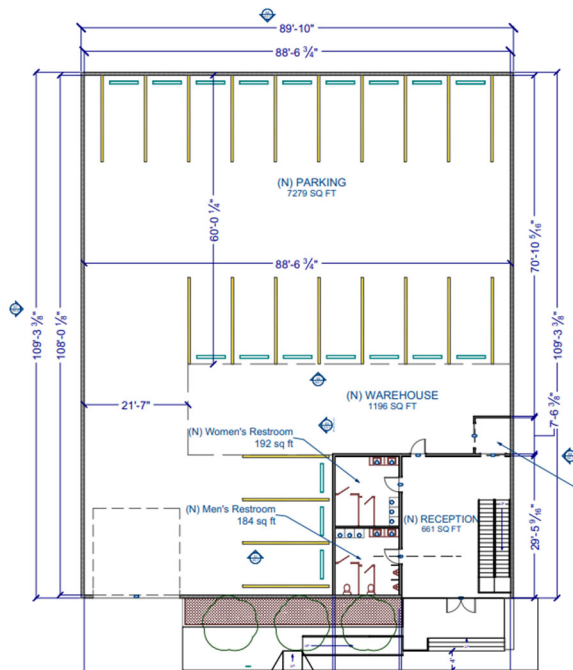
Photo: Fleet vehicles include a van and a truck with a trailer and toolboxes mounted on top

Primary access to the subject site will be from Jackson Street. Based on the proposed warehouse building and existing storage building, the subject site will be required to provide a total of 26 off-street parking spaces. The applicant is proposing a total of 28 off-street parking spaces, including one Americans with Disabilities Act (ADA)-compliant parking space.

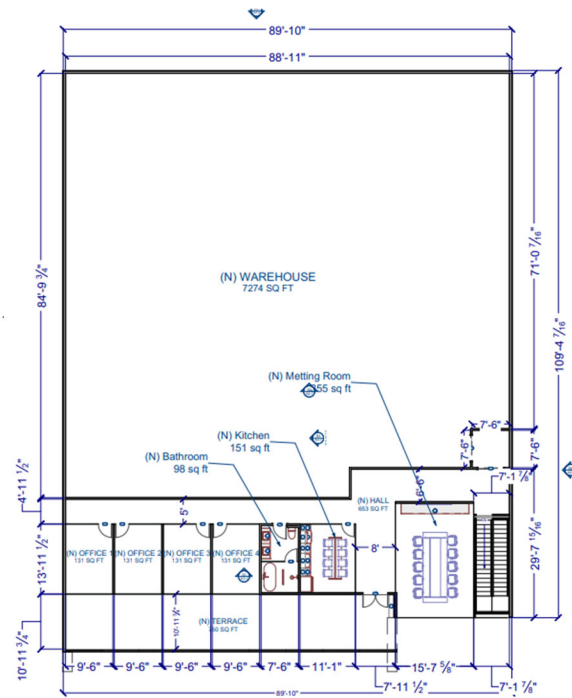
Below is the proposed site plan of the site location.



Below is the building floor plan.



First Floor



Second Floor

Below are site photos from June 22, 2026.



Front/north view of the subject site.



South-facing view of the existing storage building.

Analysis

The proposed use is located in an appropriate zone and is compatible with the surrounding businesses. The subject site is adequately sized and configured to accommodate the proposed warehouse use. The project as proposed will provide required parking, drive aisles, and landscaping, and will enhance the area with the proposed modern warehouse.

Environmental Assessment

This project is exempt from the provisions of the California Environmental Quality Act (CEQA) as a Section 15303, Class 3 (new construction or conversion of small structures) Categorical Exemption pursuant to Article 19, Section 15303 of CEQA Guidelines.

FISCAL IMPACT

None.

VISION, MISSION, VALUES, AND STRATEGIC OUTCOMES

The City's Vision, Mission, and Values set the standard for the organization; establish priorities, uniformity, and guidelines; and provide the framework for policy decisionmaking. The Strategic Outcomes were implemented to provide a pathway to achieving the Vision of a city that is safe, healthy, and attractive. This item aligns with Strategic Outcome No. 1: Safe Community.

RECOMMENDED ACTION

Adopt Resolution No. PC 26:020, approving Conditional Use Permit No. 1000, subject to the conditions of approval in the resolution.

CITY OF PARAMOUNT
LOS ANGELES COUNTY, CALIFORNIA

**PLANNING COMMISSION
RESOLUTION NO. PC 26:020**

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF PARAMOUNT SETTING FORTH ITS FINDINGS OF FACT AND DECISION RELATIVE TO CONDITIONAL USE PERMIT NO. 1000, A REQUEST BY ABRAHAM CENDEJAS ARAMBULA/A&B ATELIER BUILDERS FOR FRANCISCO VILLA CORTES/MASTER ROOTER AND PLUMBING, INC. FOR A CONDITIONAL USE PERMIT (CUP) TO ALLOW THE OPERATION OF A PLUMBING AND SEWER SERVICE BUSINESS WITH NINE SERVICE TRUCKS AT 7757 JACKSON STREET IN THE M-2 (HEAVY MANUFACTURING) ZONE

WHEREAS, the Planning Commission of the City of Paramount has received an application from Abraham Cendejas Arambula/A&B Atelier Builders for Francisco Villa Cortes/Master Rooter and Plumbing, Inc. for a conditional use permit (CUP) to allow the operation of a plumbing and sewer service business with nine service trucks at 7757 Jackson Street in the M-2 (Heavy Manufacturing) zone; and

WHEREAS, Paramount Municipal Code Section 17.48.030 et seq., a portion of the Zoning Ordinance of the City of Paramount, requires the Planning Commission to duly notice a public hearing, receive a report from staff, conduct the hearing and consider all evidence before it, and thereafter announce its findings and decisions in zoning matters and specifically for conditional use permits; and

WHEREAS, this project is exempt from the provisions of the California Environmental Quality Act (CEQA) as a Section 15303, Class 3 Categorical Exemption – new construction of small structures; and

WHEREAS, on July 1, 2026, the Planning Commission conducted a duly noticed public hearing on the application, at which time it heard a presentation by the Planning and Building Department staff as well as the opportunity for testimony regarding the proposed Project.

NOW, THEREFORE, BE IT RESOLVED BY THE PLANNING COMMISSION OF THE CITY OF PARAMOUNT AS FOLLOWS:

SECTION 1. The above recitations are true and correct.

SECTION 2. The Planning Commission finds that it has conducted all the public hearings necessary and in compliance with State Law and the Municipal Code of the City of Paramount.

SECTION 3. The Planning Commission finds that all requirements of notice have been complied with pursuant to State Law and the Municipal Code.

SECTION 4. The Planning Commission finds that the evidence presented does justify the granting of this application for the following reasons:

1. The requested use at the location proposed will not:
 - a. Adversely affect the health, peace, safety, or welfare of persons residing or working in the surrounding area;
 - b. Be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; nor
 - c. Jeopardize, endanger or otherwise constitute a menace to the public health, safety, or general welfare; and
2. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this chapter, or as is otherwise required in order to integrate such use with the uses in the surrounding area; and
3. That the proposed site is adequately served:
 - a. By highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and
 - b. By other public or private service facilities as are required.

SECTION 5. That pursuant to Resolution No. 82:043 of the City Council the time limit to seek judicial review pursuant to California Code of Civil Procedure is ninety (90) days from the date hereof.

SECTION 6. The Planning Commission hereby approves the applied for Conditional Use Permit as to use in the above entitled matter, subject to the following conditions:

General

1. Conditions. All conditions of approval of Conditional Use Permit No. 1000 shall be printed as general notes on the approved set of building plans.
2. Material Deviation. Except as set forth in conditions, development shall take place substantially as shown on the approved site plan. Any material deviation must be approved by the Planning and Building Department before construction.
3. Affidavit. This Conditional Use Permit shall not be effective for any purposes until the applicant has first filed at the office of the Planning Commission a sworn affidavit acknowledging and accepting all conditions of this Conditional Use Permit. The affidavit shall be submitted by Friday, July 17,

2026. Failure to provide the City of Paramount with the requisite affidavit within the stated here in above shall render the Conditional Use Permit void.

4. One-Year Approval. Approval of this Conditional Use Permit No. 1000 shall be valid for one (1) year from the date of final approval and shall become null and void unless construction has commenced within this time period or an extension of time is granted administratively pursuant to a written request by the applicant no less than thirty days prior to the expiration date of July 1, 2026. The Director at his or her discretion may grant a one-year extension. The Planning Commission may grant up to a one-year extension at the conclusion of the initial one-year extension. Prior to the granting of the extension request by the Planning Commission, notice shall be given in the same manner as required for the original application. Commencement of development shall mean that appropriate permits have been obtained, and the development has successfully completed the first Building and Safety Division inspection.
5. Revocation. It is hereby declared to be the intent, that if any provision of this permit is violated or held to be invalid, or if any law, statute, or ordinance is violated, this Permit shall be subject to the revocation process at which time, the Permit may become terminated and the privileges granted hereunder shall lapse.
6. Violations. It is further declared and made a condition of this Conditional Use Permit that if any condition hereof is violated or if any law, statute, or ordinance is violated, the exception shall be suspended and the privileges granted hereunder shall lapse, provided that the applicant has been given written notice to cease such violation and has failed to do so within thirty (30) days of receipt of said notification.
7. Grounds for Modification, Suspension, Revocation. The applicant understands that an Unclassified Use Permit, Conditional Use Permit, and/or Variance granted under the Zoning Ordinance, or any section thereof, is granted and accepted by all parties with the express understanding that the Planning Commission may hold a public hearing, notice of time and place of which shall be given to the applicant, if one or more of the following conditions exists:
 - a. That the approval was obtained by fraud;
 - b. That the need for which such approval was granted has ceased to exist or has been suspended for one year or more;
 - c. That the Unclassified Use Permit, Conditional Use Permit, and/or Variance is being, or recently has been, exercised contrary to the terms or conditions of such approval or in violation of any statute, provision of the Code, ordinance, law, or regulation;

- d. That the need for which the approval was granted was so exercised as to be detrimental to the public health or safety or so as to constitute a nuisance (Section 17.48.070, Paramount Municipal Code).

If after such hearing, the Planning Commission finds that any grounds modification, suspension, or revocation exist, the Planning Commission may modify, suspend, or revoke such Unclassified Use Permit, Conditional Use Permit, and/or Variance.

Permitting

8. Business License. The applicant, successor tenants, and all contractors shall obtain and maintain a business license to work and/or conduct business in the City of Paramount.
9. Fees. All applicable development fees are due prior to the issuance of building permits.
10. Alterations. No exterior structural alteration or building color change, other than the colors or building treatments originally approved, shall be permitted without the prior approval of the Planning and Building Department.
11. Window Security Bars. The installation of exterior window security bars is prohibited in accordance with Section 17.36.090(L) of the Paramount Municipal Code.
12. Paint. The applicant shall maintain sufficient quantities of matching exterior paint to remove graffiti, blemishes, and peeling paint.
13. Tarps. Tarps are prohibited from use as carports, patio covers, shade covers, and covers for outdoor storage in all front and side setback areas, rear yard areas, over driveways, and in parking and circulation areas.
14. Lighting. A precise lighting plan shall be submitted showing the location and types of exterior lighting. The plan shall be subject to the approval of the Planning and Building Department. Approval criteria will emphasize both the functional as well as the decorative nature of the proposed lighting. The parking lot and other common areas shall be illuminated to a demonstrated degree equal to or exceeding one point five candles per foot. The plan and fixture design shall be approved separately from the design approval and from the working drawings.
15. Labor Regulations. The applicant shall comply with all relevant labor laws and regulations of the Division of Labor Standards Enforcement of the California Department of Industrial Relations and the Division of Occupational Safety and Health (Cal/OSHA).

16. Agency Regulations. In the ongoing business operations, the applicant shall comply with all relevant federal, state, and local laws and regulations of all relevant government agencies, including but not limited to (1) the Los Angeles County Fire Department, (2) the Industrial Waste Unit of the Los Angeles County Department of Public Works (3) the South Coast Air Quality Management District, (4) California Department of Motor Vehicles, and (5) the California Department of Resources Recycling and Recovery (CalRecycle).
17. Parking. All parking areas shall comply with applicable development requirements as specified in Article 3 (Loading Areas and Off-Street Parking) of Chapter 17.44 of the Paramount Municipal Code. The parking lot shall be restriped and maintained in a clear condition in compliance with Americans with Disabilities Act (ADA) requirements. The parking spaces, drive aisles, and pedestrian access shall meet all Municipal Code and Americans with Disabilities Act (ADA) requirements.
18. Urban Stormwater Management. The applicant shall comply with Chapter 8.20 (Urban Stormwater Management) of the Paramount Municipal Code. The outside premises shall be maintained in a clean manner at all times, and trash and debris shall be promptly removed from the yard areas, landscaped areas, the parking lot, and the surrounding property perimeter. The parking lot shall be completely swept and maintained free of debris and litter at least weekly. Areas adjacent to a parking lot, including, but not limited to, planters, loading and unloading areas, and surrounding public rights-of-way shall be maintained free of debris and litter by sweeping and other equally effective measures. Such debris and litter shall be collected and properly disposed of in compliance with all applicable local, State, and Federal regulations.
19. Infrastructure. The applicant shall ensure that the public streets and other public infrastructure remain clean from dirt and other debris during construction. The applicant shall comply with South Coast Air Quality Management District Rule 403 regarding reduction of fugitive dust with best available fugitive dust control measures.
20. The project shall comply with all conditions of approval of Development Review Application No. 26:006.

Construction

21. Hours of Construction. Construction shall take place 7:00 a.m. to 7:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m. on Saturday. Construction is prohibited on Sundays and national holidays.

Business Operations

22. Business Review. Establishment and operation of any use of the metal building shall be subject to the review and approval of the Planning and Building Department.
23. Signs. Signs, banners, and feather flags require separate review and approval by the Planning and Building Department prior to fabrication and installation. Signs shall not conceal architectural features on the exterior of the building. Damage to the building exterior from wall signs that have been removed shall be repainted and repaired as needed.
24. Window Signs. Window sign area shall be limited to 40 percent of each grouping of adjacent panes of glass.
25. Signs. Any sign on the building and parking lot area in disrepair shall be repaired or replaced with an equivalent sign and maintained in good condition.
26. Special Events. Special events shall be reviewed in accordance with Special Event Permit regulations for possible approval by the Planning and Building Department.
27. Clean Premises. The outside premises shall be maintained in a clean manner at all times, and trash and debris shall be promptly removed from the yard areas, landscaped areas, and the surrounding property perimeter.
28. Landscaping and Irrigation. Existing and new planters shall be planted, refurbished, and maintained as needed. A two-inch layer of brown mulch shall be applied in the planters. Red mulch is not an acceptable material. A precise landscaping and irrigation plan shall be submitted showing the size, type, and location of all plant material (including trees, shrubs, groundcover and mulch) and irrigation. The plan shall comply with the Model Water Efficient Landscape Ordinance (MWELO) of the State of California and Chapter 17.96 (Water-Efficient Landscape Provisions) of the Paramount Municipal Code. Live turf shall not be planted or installed in anticipation of AB 1572 (Regulation of Nonfunctional Turf Irrigation) taking effect. The plan shall be subject to the approval consideration of the Planning and Building Department and shall be approved separately from the design approval and from the working drawings. Landscaping shall be planted and irrigation shall be installed and maintained in perpetuity in accordance with the approved plan and State and City regulations. No mature trees shall be removed without the written authorization of the Planning and Building Department.
29. Trees. The applicant shall plant and maintain a minimum of one 24-inch-box shade/canopy tree subject to Planning and Building Department review and approval of the specific quantity, type, and location.

30. Outdoor Storage. Outdoor storage of materials and equipment is prohibited without first obtaining a separate conditional use permit in accordance with Section 17.36.040(29) of the Paramount Municipal Code.
31. Truck Delivery. Stopping, loading, and unloading of delivery trucks associated with inbound and outbound shipments is prohibited on public streets and alleys.
32. Floor Plan. The approved floor plan shall not be changed without prior approval by the Planning and Building Department.
33. Security Cameras. The Public Safety Department shall review and approve the security camera system, including technology, locations, orientations, and comprehensive camera views of the establishment interior, exterior, and parking lot. The approved camera system shall be maintained in perpetuity and be capable of retaining video footage for a minimum of 30 days. In the event of an incident or upon request, the business owner shall allow unimpeded inspection of the security camera system and all related footage to Sheriff's Department and City of Paramount personnel.
34. Noise. Outdoor speakers or other exterior audible devices are prohibited.
35. Bicycle Rack. At least one bicycle rack shall be provided and maintained in good condition in perpetuity. The rack shall be an inverted "U" or another rack type that allows for a bicycle frame and one wheel to be attached. The type, color, and precise location of the rack shall be reviewed and approved by the Planning and Building Department prior to purchase or installation of the rack. The precise location shall be within the clear range of a security camera.
36. Fence Maintenance. The existing chain link fencing along the south and west side of the property lines shall be removed and replaced with material acceptable to the Planning Division. The existing block wall along the south property line shall either be replaced or repaired, which may include power washing, sandblasting and/or repainting the walls (following separate Planning Division review of a proposed paint color) as needed. The applicant shall submit a fence and wall plan detailing all proposed fencing and walls improvements for the development and shall be subject to the review and approval of the Planning and Building Department prior to purchase, installation, or construction.
37. Parking Lot. The parking lot shall be refurbished and maintained free of any cracks or damage.
38. Screening. Screening materials shall be reviewed and approved by the Planning and Building Department prior to installation. Chainlink may not be used as a component of screening material.

39. Trash. The business shall comply with Chapter 17.118 of the Paramount Municipal Code.
40. Organic Waste. The business shall comply with organic waste disposal requirements of Chapter 13.09 of the Paramount Municipal Code.
41. Tenant Improvement. Future tenant improvements and other construction shall meet all requirements of the Building and Safety Division.
42. Exterior. No exterior structural alteration or building color change, other than the colors or building treatments originally approved, shall be permitted without the prior approval of the Planning and Building Department.
43. Graffiti Removal. Any graffiti, including graffiti in the form of window etching, shall be promptly removed.
44. Barbed Wire. Barbed/razor wire is prohibited.
45. Noise Ordinance. In the ongoing business operations, the applicant shall comply with the Noise Ordinance (Chapter 9.12 of the Paramount Municipal Code).
46. Objectable Operations. All operations conducted on the premises shall not be objectionable by reason of noise, steam, vibration, odor, or hazard.
47. Use of Building/Property. Establishment and operation of any use to the metal building shall be subject to the review and approval of the Planning and Building Department.
48. Digital Plans. An electronic copy (PDF format) of the plans shall be submitted to the Planning and Building Department prior to permit issuance.

Final Approval

49. At the completion of the project, final approval from the Planning Division shall be obtained prior to Building and Safety Division final approval. All conditions of approval shall be met prior to final approval by the Planning Division.

SECTION 7. Appeal. Within 10 calendar days after approval of this Resolution by the Planning Commission, any aggrieved or interested person may, if dissatisfied with or aggrieved by the action of the Planning Commission, file with the City Clerk an appeal in writing to the City Council from such action of the Planning Commission upon depositing a filing fee as set forth in Resolution No. 24:040. The filing of such appeal within the stated time shall stay the effective date of decision of the Planning Commission until such time as the City Council has acted on the appeal as set forth in this chapter. The hearing on the appeal by the City Council

shall be a hearing de novo. In the absence of such appeal, the action of the Planning Commission shall be final.

SECTION 8. if not appealed, this Resolution shall take effect at the expiration of the appeal period set out in Section 7 above.

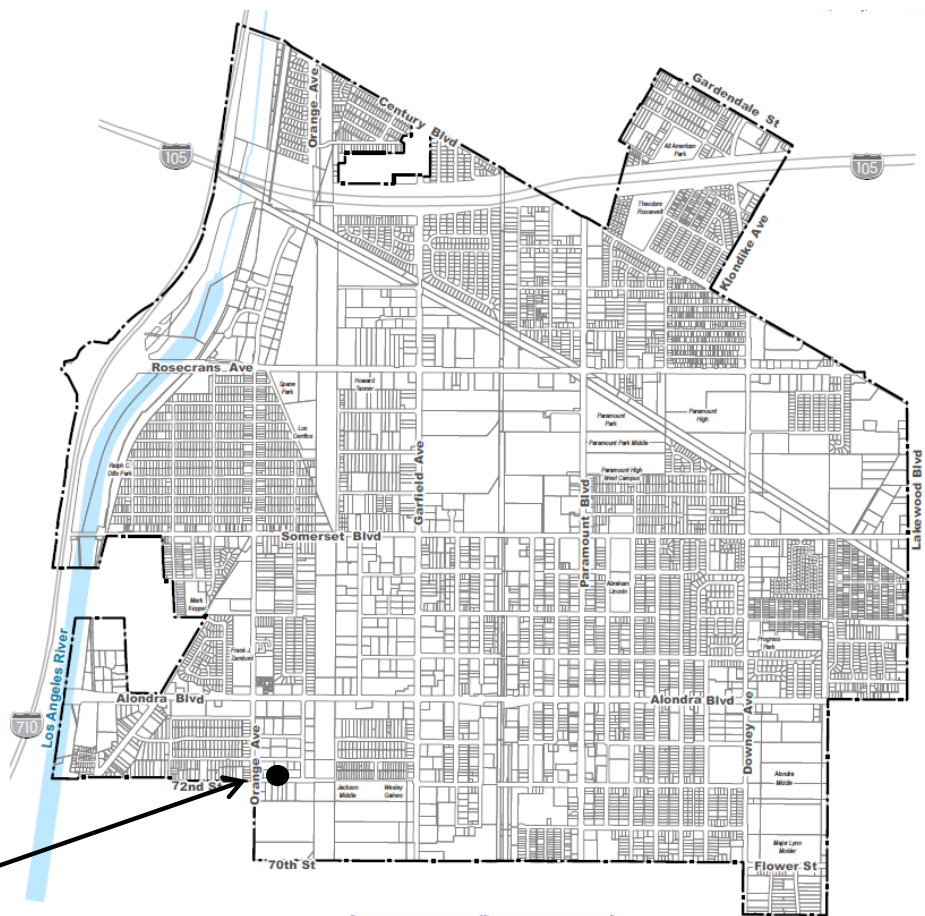
PASSED, APPROVED, and ADOPTED this 1st day of July 2026.

Linda Timmons, Chair

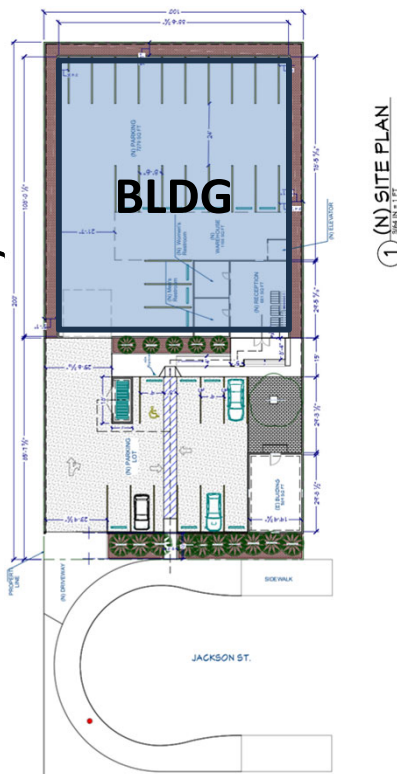
Attest:

Biana Salgado, Administrative Assistant

Conditional Use Permit No. 1000



Subject
Property



7757 Jackson Street

JULY 1, 2026

PUBLIC HEARING

CONDITIONAL USE PERMIT NO. 1001

- A. HEAR STAFF REPORT.
- B. OPEN THE PUBLIC HEARING.
- C. HEAR TESTIMONY IN THE FOLLOWING ORDER:
 - (1) THOSE IN FAVOR
 - (2) THOSE OPPOSED
 - (3) REBUTTAL BY THE APPLICANT
- D. MOTION TO CLOSE THE PUBLIC HEARING.

<u>MOTION:</u>	<u>ROLL CALL VOTE:</u>
MOVED BY: _____	AYES: _____
SECONDED BY: _____	NOES: _____
[] APPROVED	ABSENT: _____
[] DENIED	ABSTAIN: _____

- E. MOTION IN ORDER:
READ BY TITLE ONLY, WAIVE FURTHER READING, AND ADOPT
PLANNING COMMISSION RESOLUTION NO. PC 26:021, A REQUEST
BY CASTLE METALS, INC. TO EXPAND EXISTING PRECISION
METAL CUTTING AND POLISHING WITHIN AN EXISTING 246,878
SQUARE FOOT BUILDING AND ADD CHEMICAL MILLING AT 14001
ORANGE AVENUE IN THE M-2 (HEAVY MANUFACTURING) ZONE.

MOTION:

MOVED BY: _____

SECONDED BY: _____

[] APPROVED

[] DENIED

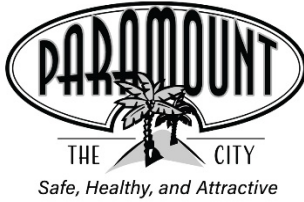
ROLL CALL VOTE:

AYES: _____

NOES: _____

ABSENT: _____

ABSTAIN: _____



CITY OF PARAMOUNT PLANNING DEPARTMENT STAFF REPORT SUMMARY

PROJECT NUMBER:	Conditional Use Permit No. 1001
REQUEST:	Expansion of existing precision metal cutting and polishing within an existing 246,878 square foot building and the addition of chemical milling
APPLICANT:	Castle Metals, Inc.
MEETING DATE:	July 1, 2026
LOCATION:	14001 Orange Avenue
ZONE:	M-2 (Heavy Manufacturing)
GENERAL PLAN:	Industrial
PLANNER:	John King
RECOMMENDATION	Approval



To: Honorable Planning Commission

From: John King, AICP, Planning and Building Director

By:

Date: July 1, 2026

**Subject: CONDITIONAL USE PERMIT NO. 1001
CASTLE METALS, INC.**

BACKGROUND

This application is a request by Castle Metals, Inc. to allow the expansion of existing precision metal cutting and polishing within an existing 246,878 square foot building and add chemical milling at 14001 Orange Avenue in the M-2 (Heavy Manufacturing) zone.

According to information available on the corporate website, the applicant, A.M. Castle & Co., was founded in Chicago in 1890 by Alfred Martin Castle. Castle Metals has been the brand for A. M. Castle & Co.'s metals business since 1976. After decades of expansion, in 2023, A. M. Castle & Co., including Castle Metals Aerospace and Castle Metals Industrial, merged with Banner Industries.

On May 16, 1978, the Development Review Board approved Development Review Application No. 78:017. This approval of an application from A.M. Castle & Co. allowed for the construction of an industrial building with a two-story tilt-up office building in the northernmost area of Orange Industrial Park. The site is 12.1 acres.

On March 13, 2013, the Planning Commission approved Conditional Use Permit No. 745, allowing the installation of a 750-gallon nitrogen tank system on the west side (rear) exterior of the building. The applicant has since removed the nitrogen tank system, and this CUP has expired and is no longer effective.

On April 9, 2013, the Planning Commission approved Conditional Use Permit No. 749, allowing the installation and operation of an exterior dust collector system consisting of a baghouse collector, a filtration system, and fan equipment. This equipment filters particulates from the manufacturing process into an enclosed 40-yard dumpster bin. The dust collection system is still in place and in use.

Castle Metals currently employs approximately 30 people at the Paramount location and would add three employees for a total of 33. The facility hours of operation are Monday through Friday from 7:00 a.m. to 3:00 p.m. and would not expand.

DISCUSSION

Site Description

The subject site is located on the west side of Orange Avenue at the northern area of the Orange Industrial Park. The Los Angeles River is to the west of the site. A Los Angeles Department of Water and Power (LADWP) right-of-way is to the north.

Photos

With the exception of the first photo below, the following photos were taken on June 23, 2026.



View looking northwest at the subject building from Orange Avenue (Feb. 2025, Google Street View).



View of monument sign and lawn



View of chain link fencing with barbed wire on south side of building



View looking south at office area at north side of the building



View looking southeast from Los Angeles River Path

Project Description

Castle Metals is applying for to allow the expansion of the existing business from the north portion of the building into the south portion of the building. The proposed chemical milling operations would chemically mill titanium, aluminum, and steel. In the application for the subject request, the applicant states that the chemical milling process involves submerging the selected material (titanium, aluminum, or steel sheets) in an etching

solution that reacts with the metal to remove excess material and create the desired shape or pattern. No acid manufacturing would take place on the property.

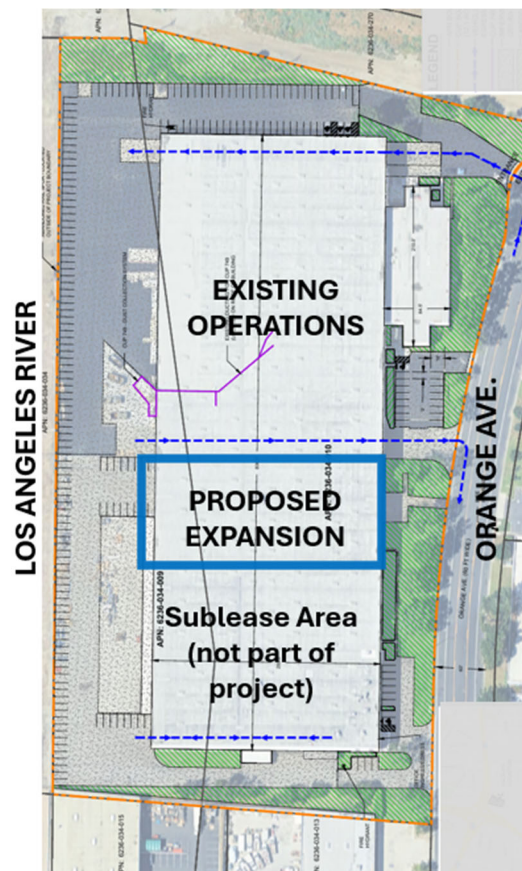
The etching solution would be stored in two 1,400-gallon chemical milling tanks. Emissions from the chemical milling tanks would be sent to a scrubber where diluted sodium hydroxide would be added to ensure neutrality before water vapor is exhausted.

Two chemical milling tanks are proposed. These two tanks are considered Nitric Acid Units according to South Coast Air Quality Management District (SCAQMD) Rule 1159.1. Fumes from the two chemical milling tanks will be routed to a scrubber that meets control requirements of Rule 1159.1.

A technical memorandum prepared by Sespe Consulting (copy attached) analyzed transportation impacts of the proposed project. The analysis determined that the project would create minimal increases in employee and truck trips. The business presently averages eight truck round-trips each business day. The proposed changes are expected to increase truck trips to a total of 10 truck round-trips per day. A condition of approval prohibiting trucks from stopping or loading on public streets will ensure minimal impacts.

Site Plan

Below is the site plan.



Analysis

The proposed business is located in an appropriate manufacturing zone and is compatible with the surrounding businesses in the industrial zone. The location is adequate in size and sufficient parking will be provided. Conditions of approval, including conditions of past projects that are still applicable, and compliance with South Coast Air Quality Management District regulations, will ensure impacts to the surrounding area is to a minimum. The additional truck trips generated are minimal, and the property and surroundings are suitable for the nominal impacts.

Environmental Assessment

An Air Quality Impact Analysis by Trinity Consultants determined that operation-related emissions would be less than the South Coast Air Quality Management District threshold levels. The following is a summary:

Emissions Source	Pollutant (pounds/day)					
	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Category						
Passenger Vehicles	0.00	0.01	0.12	0.00	0.00	0.00
Trucks	0.00	0.07	0.00	0.00	0.00	0.00
Boiler	0.04	0.69	0.00	0.58	0.05	0.00
Scrubber	-	3.65	-	-	-	-
Daily Emissions	0.04	4.41	0.13	0.58	0.05	0.00
South Coast AQMD Significance Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
<i>Source: Trinity Consultants 2026</i> <i>Note: 0.00 could represent > 0.00</i>						

This project is a Class 1 (existing facilities) Categorical Exemption pursuant to Article 19, Section 15301 of California Environmental Quality Act (CEQA) Guidelines.

FISCAL IMPACT

None.

VISION, MISSION, VALUES, AND STRATEGIC OUTCOMES

The City's Vision, Mission, and Values set the standard for the organization; establish priorities, uniformity, and guidelines; and provide the framework for policy decisionmaking. The Strategic Outcomes were implemented to provide a pathway to achieving the Vision of a city that is safe, healthy, and attractive. This item aligns with Strategic Outcomes No. 1: Safe Community.

RECOMMENDED ACTION

It is recommended that the Planning Commission adopt Resolution No. PC 26:021, approving Conditional Use Permit No. 1001, subject to the conditions of approval in the resolution.

CITY OF PARAMOUNT
LOS ANGELES COUNTY, CALIFORNIA

**PLANNING COMMISSION
RESOLUTION NO. PC 26:021**

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF PARAMOUNT SETTING FORTH ITS FINDINGS OF FACT AND DECISION RELATIVE TO CONDITIONAL USE PERMIT NO. 1001, A REQUEST BY CASTLE METALS, INC. FOR A CONDITIONAL USE PERMIT TO ALLOW THE EXPANSION OF EXISTING PRECISION METAL CUTTING AND POLISHING WITHIN AN EXISTING 246,878 SQUARE FOOT BUILDING AND ADD CHEMICAL MILLING AT 14001 ORANGE AVENUE IN THE M-2 (HEAVY MANUFACTURING) ZONE

WHEREAS, the Planning Commission of the City of Paramount has received an application from Castle Metals, Inc. to allow the expansion of existing precision metal cutting and polishing within an existing 246,878 square foot building and add chemical milling at 14001 Orange Avenue in the M-2 (Heavy Manufacturing) zone; and

WHEREAS, Paramount Municipal Code Section 17.48.030 et seq., a portion of the Zoning Ordinance of the City of Paramount, requires the Planning Commission to duly notice a public hearing, receive a report from staff, conduct the hearing and consider all evidence before it, and thereafter announce its findings and decisions in zoning matters and specifically for conditional use permits; and

WHEREAS, this project is exempt from the provisions of the California Environmental Quality Act (CEQA) as a Section 15301, Class 1 Categorical Exemption – minor alteration to an existing private structure;

NOW, THEREFORE, BE IT RESOLVED BY THE PLANNING COMMISSION OF THE CITY OF PARAMOUNT AS FOLLOWS:

SECTION 1. The above recitations are true and correct.

SECTION 2. The Planning Commission finds that it has conducted all the public hearings necessary and in compliance with State Law and the Municipal Code of the City of Paramount.

SECTION 3. The Planning Commission finds that all requirements of notice have been complied with pursuant to State Law and the Municipal Code.

SECTION 4. The Planning Commission finds that the evidence presented does justify the granting of this application for the following reasons:

1. The requested use at the location proposed will not:
 - a. Adversely affect the health, peace, safety, or welfare of persons residing or working in the surrounding area;

- b. Be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site; nor
 - c. Jeopardize, endanger or otherwise constitute a menace to the public health, safety, or general welfare; and
- 2. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping, and other development features prescribed in this chapter, or as is otherwise required in order to integrate such use with the uses in the surrounding area; and
- 3. That the proposed site is adequately served:
 - a. By highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and
 - b. By other public or private service facilities as are required.

SECTION 5. That pursuant to Resolution No. 82:043 of the City Council the time limit to seek judicial review pursuant to California Code of Civil Procedure is ninety (90) days from the date hereof.

SECTION 6. The Planning Commission hereby approves the applied for Conditional Use Permit as to use in the above-entitled matter, subject to the following conditions:

General

- 1. Conditions. All conditions of approval of Conditional Use Permit No. 1001 shall be printed as general notes on the approved set of building plans.
- 2. Material Deviation. Except as set forth in conditions, development shall take place substantially as shown on the approved site plan. Any material deviation must be approved by the Planning and Building Department before construction.
- 3. Affidavit. This Conditional Use Permit shall not be effective for any purposes until the applicant has first filed at the office of the Planning Commission a sworn affidavit acknowledging and accepting all conditions of this Conditional Use Permit. The affidavit shall be submitted by Friday, July 17, 2026. Failure to provide the City of Paramount with the requisite affidavit within the stated here in above shall render the Conditional Use Permit void.
- 4. One-Year Approval. Approval of this Conditional Use Permit No. 1001 shall be valid for one (1) year from the date of final approval and shall become null and void unless construction has commenced within this time period or an extension of time is granted administratively pursuant to a written request by the applicant no less than thirty days prior to the expiration date of July

1, 2027. The Director at his or her discretion may grant a one-year extension. The Planning Commission may grant up to a one-year extension at the conclusion of the initial one-year extension. Prior to the granting of the extension request by the Planning Commission, notice shall be given in the same manner as required for the original application. Commencement of development shall mean that appropriate permits have been obtained.

5. Revocation. It is hereby declared to be the intent, that if any provision of this permit is violated or held to be invalid, or if any law, statute, or ordinance is violated, this Permit shall be subject to the revocation process at which time, the Permit may become terminated and the privileges granted hereunder shall lapse.
6. Violations. It is further declared and made a condition of this Conditional Use Permit that if any condition hereof is violated or if any law, statute, or ordinance is violated the exception shall be suspended and the privileges granted hereunder shall lapse, provided that the applicant has been given written notice to cease such violation and has failed to do so within thirty (30) days of receipt of said notification.
7. Grounds for Modification, Suspension, Revocation. The applicant understands that an Unclassified Use Permit, Conditional Use Permit, and/or Variance granted under the Zoning Ordinance, or any section thereof, is granted and accepted by all parties with the express understanding that the Planning Commission may hold a public hearing, notice of time and place of which shall be given to the applicant, if one or more of the following conditions exists:
 - a. That the approval was obtained by fraud;
 - b. That the need for which such approval was granted has ceased to exist or has been suspended for one year or more;
 - c. That the Unclassified Use Permit, Conditional Use Permit, and/or Variance is being, or recently has been, exercised contrary to the terms or conditions of such approval or in violation of any statute, provision of the Code, ordinance, law, or regulation;
 - d. That the need for which the approval was granted was so exercised as to be detrimental to the public health or safety or so as to constitute a nuisance (Section 17.48.070, Paramount Municipal Code).

If after such hearing, the Planning Commission finds that any grounds for modification, suspension, or revocation exist, the Planning Commission may modify, suspend, or revoke such Unclassified Use Permit, Conditional Use Permit, and/or Variance.

Permitting

8. Conditions of Approval. The applicant shall comply with all conditions of approval from Conditional Use Permit No. 1001.
9. Chemical Milling Equipment. Chemical milling equipment is limited to the following unless replaced with smaller and/or more efficient equipment, superseded by a South Coast Air Quality Management District requirement, or minor adjustments are required to be implemented following consultation with the Planning and Building Department:
 - a. Evaporator hot tank measuring 60" x 72" x 60" deep with a polypropylene evaporator unit, fan mount on the top, recirculation pump, and heat exchanger.
 - b. Filter press with a four cubic feet capacity.
 - c. One fiberglass reinforced plastic conical bottom neutralization tank measuring 96" diameter x 120" tall with a 2,400-gallon capacity.
 - d. Fume scrubber. 9,500 cubic feet per minute scrubber.
 - e. Boiler. 0.9 million BTUs per hour boiler.
 - f. Two chemical milling tanks measuring 36" x 150" x 60" deep, each with a 1,400-gallon capacity.
 - g. One rinse tank measuring 48" x 150" x 60" deep with a 1,400-gallon capacity.
 - h. Overhead gantry crane: hoist and painted steel structure I-beam.
 - i. Secondary containment area: 312" x 408" x 6" deep with a 3,300-gallon capacity to be constructed under the chemical milling tanks and the rinse tank.
 - j. Ventilation hood. One common fiberglass reinforced plastic side lip exhaust hood with 28" diameter duct connection to be mounted on the evaporator hot tank.
 - k. Fiberglass reinforced plastic duct and fittings from the scrubber to the floor-mounted fan and ventilation hood at the chemical milling and rinse tanks.
10. Permits. All required permits and licenses from all relevant regulating bodies shall be valid at all times. A copy of all licenses, permits, and conditions shall be posted and maintained in a place conspicuous and readable by all employees and customers of the business.

11. Exterior. No exterior structural alteration or building color change, other than the colors or building treatments originally approved, shall be permitted without the prior approval of the Planning and Building Department.
- ~~12. License. No exterior structural alteration or building color change, other than the colors or building treatments originally approved, shall be permitted without the prior approval of the Planning and Building Department.~~
13. Fees. All applicable development or user fees are due prior to the issuance of permits for any future construction.
14. Plans. The plans are subject to approval by the Building and Safety Division of the Planning and Building Department and the Los Angeles County Fire Department.
15. Paint. The applicant shall maintain sufficient quantities of matching exterior paint to remove graffiti, blemishes, and peeling paint. Graffiti shall be promptly removed or painted over with paint to match the predominant surface color.
16. Tarps. Tarps are prohibited from use as carports, patio covers, shade covers, and covers for outdoor storage in all front and side setback areas, rear yard areas, over driveways, and in parking and circulation areas.
17. Future SCAQMD Permits and City Permits. The applicant shall notify and consult with Planning and Building Department staff in advance of any future South Coast Air Quality Management District (SCAQMD) permit applications (permits to operate and permits to construct) to determine any required City permits.
18. Window Security Bars. The installation of exterior window security bars is prohibited in accordance with Section 17.36.090(L) of the Paramount Municipal Code.
19. Chain Link. Chain link material in view from the public right-of-way is prohibited.
20. Digital Plans. An electronic copy (PDF format) of the construction plan set shall be submitted to the Planning and Building Department prior to permit issuance.
21. Labor Regulations. The applicant shall comply with all relevant labor laws and regulations of the Division of Labor Standards Enforcement of the California Department of Industrial Relations and the Division of Occupational Safety and Health (Cal/OSHA).
22. Business License. The applicant and all successor tenants shall obtain and maintain a current City of Paramount business license.

23. Parking. All parking areas shall comply with applicable development requirements as specified in Article 3 (Loading Areas and Off-Street Parking) of Chapter 17.44 of the Paramount Municipal Code. The parking lot shall be restriped and maintained in a clear condition in compliance with Americans with Disabilities (ADA) requirements. The parking spaces and drive aisles shall meet all Paramount Municipal Code and Americans with Disabilities Act (ADA) requirements.
- ~~24. Labor Regulations. The applicant shall comply with all relevant labor laws and regulations of the Division of Labor Standards Enforcement of the California Department of Industrial Relations and the Division of Occupational Safety and Health (Cal/OSHA)~~
25. Agency Regulations. In the ongoing operations, the applicant shall comply with all relevant federal, State, and local laws and regulations of all relevant government agencies, including but not limited to (1) the Los Angeles County Fire Department, (2) the Certified Unified Program Agency (CUPA), (3) the South Coast Air Quality Management District, (4) the Los Angeles County Sanitation Districts, and (5) the California Department of Resources Recycling and Recovery (CalRecycle).
26. Urban Stormwater Management. The applicant shall comply with Chapter 8.20 (Urban Stormwater Management) of the Paramount Municipal Code. The outside premises shall be maintained in a clean manner at all times, and trash and debris shall be promptly removed from the yard areas, landscaped areas, the parking lot, and the surrounding property perimeter. The parking lot shall be completely swept and maintained free of debris and litter at least weekly. Areas adjacent to a parking lot, including, but not limited to, planters, loading and unloading areas, and surrounding public rights-of-way shall be maintained free of debris and litter by sweeping and other equally effective measures. Such debris and litter shall be collected and properly disposed of in compliance with all applicable local, State, and Federal regulations.
27. Permit for Industrial Wastewater Discharge. The proposed project may require a Los Angeles County Sanitation Districts (Districts) permit for Industrial Wastewater Discharge. The applicant shall contact the Districts' Industrial Waste Section at (562) 908-4288, Extension 2900 in order to reach a determination on this matter. If this permit is necessary, the applicant shall be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. The applicant shall provide the Planning and Building Department a written explanation of the determination, including a copy of the permit for Industrial Wastewater Discharge if the permit is required.

28. SCAQMD Rules. The business shall comply with all applicable South Coast Air Quality Management District (SCAQMD) rules including but not limited to Rule 203 (Permit to Operate), Rule 212 (Standards for Approving Permits), Rule 222 (Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II), Rule 301 (Permitting and Associated Fees), Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), Rule 404 (Particulate Emissions), Rule 1146.2 (Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters), Rule 1159.1 (Control of Nox Emissions from Nitric Acid Tanks), Rule 1401 (New Source Review of Toxic Air Contaminants), Rule 1402 (Control of Toxic Air Contaminants from Existing Sources), Rule 1426 (Emissions from Metal Finishing Operations).
29. Natural Gas Boiler. The business shall replace the natural gas boiler with an electric boiler by January 1, 2031 in accordance with Rule 1146.2.
30. Future SCAQMD Permits and City Permits. The applicant shall notify and consult with Planning and Building Department staff in advance of any future South Coast Air Quality Management District (SCAQMD) permit applications (permits to operate and permits to construct) to determine any required City permits.
31. Metal Manufacturing Performance Standards. Upon issuance of a permit to operate from the South Coast Air Quality Management District (SCAQMD), the business shall comply with Section 17.36.050 (Metal manufacturing performance standards) of the Paramount Municipal Code.

Business Operations

32. Truck Delivery. Stopping, loading, and unloading of delivery trucks associated with inbound and outbound shipments is prohibited on public streets.
33. Fugitive Dust. The applicant shall comply with South Coast Air Quality Management District Rule 403 regarding reduction of fugitive dust with best available fugitive dust control measures.
34. Sign Maintenance. Any sign on the building and premises, including the parking lot area, in disrepair shall be cleaned, repaired or replaced with an equivalent sign and maintained in good condition.
35. Clean Premises. The outside premises shall be maintained in a clean manner at all times, and trash and debris shall be promptly removed from the yard areas, landscaped areas, and the surrounding property perimeter.
36. Outdoor Storage. The expansion of existing outdoor storage shall not be permitted.

37. Security Cameras. The Public Safety Department shall review and approve the security camera system, including technology, locations, orientations, and comprehensive camera views of the establishment interior, exterior, and parking lot. The approved camera system shall be maintained in perpetuity and be capable of retaining video footage for a minimum of 30 days. In the event of an incident or upon request, the business owner shall allow unimpeded inspection of the security camera system and all related footage to Sheriff's Department and City of Paramount personnel.
38. Floor Plan. The approved floor plan shall not be changed without prior approval by the Planning and Building Department.
39. Landscaping and Irrigation. The landscaping and irrigation in the existing planters at the front and north side of the building shall be refurbished and maintained as needed. Weeds and overgrowth shall be eliminated. Until the provisions of AB 1572 (Regulation of Nonfunctional Turf Irrigation) are applicable, the irrigation serving the existing front lawn shall be repaired to allow for complete coverage of the lawn. Before AB 1572 takes effect, the applicant shall submit a landscape/irrigation plan for Planning and Building Department review and approval consideration. The plan shall comply with the Model Water Efficient Landscape Ordinance (MWELO) of the State of California and Chapter 17.96 (Water-Efficient Landscape Provisions) of the Paramount Municipal Code. A two-inch layer of brown mulch shall be applied in the planters. Red mulch is not an acceptable material. Landscaping shall be planted and irrigation shall be installed and maintained in perpetuity in accordance with the approved plan and State and City regulations. Landscaping and irrigation shall be maintained in perpetuity in accordance with State and City regulations. Any mature tree shall be not be removed without prior written authorization of the Planning and Building Department.
40. Tenant Improvement. Future tenant improvements and other construction shall meet all requirements of the Building and Safety Division.
41. Agencies. In the ongoing business operations, the applicant shall comply with all relevant federal, state, and local laws and regulations of all relevant government agencies, including but not limited to (1) the Los Angeles County Fire Department, (2) the South Coast Air Quality Management District, (3) the Los Angeles County Certified Unified Program Agency, (4) Sanitation Districts of Los Angeles County, (5) California Water Board, (6) California Department of Industrial Relations, and (7) the California Department of Resources Recycling and Recovery (CalRecycle).
42. Noise. In the ongoing business operations, the applicant shall comply with the Noise Ordinance (Chapter 9.12 of the Paramount Municipal Code).
43. Objectionable Operations. All operations conducted on the premises shall not be objectionable by reason of noise, steam, vibration, odor, or hazard.

- ~~44. Noise. In the ongoing business operations, the applicant shall comply with the Noise Ordinance (Chapter 9.12 of the Paramount Municipal Code).~~
45. Accessibility. Curbs, walkways, and parking stalls, including standard, compact, and American with Disabilities Act (ADA)-compliant stalls, shall be painted/striped as provided on the associated site plan. Solid striping shall be maintained in good condition.
46. Trash. The business shall comply with Chapter 17.118 of the Paramount Municipal Code.
47. Organic Waste. The business shall comply with organic waste disposal requirements of Chapter 13.09 of the Paramount Municipal Code.
48. Bicycle Rack. A bicycle rack shall be provided and maintained in good condition in perpetuity. The bicycle rack shall be an inverted "U" rack or another rack type that allows for a bicycle frame and one wheel to be attached. The type, color, and precise location of the rack shall be reviewed and approved by the Planning and Building Department prior to purchase or installation of the rack. The precise location shall be within the clear range of a security camera.

Special Conditions

49. Parking Lot. The asphalt driveway and parking lot at the front of the property at the south half of the subject site shall be repaired, reslurried, and restriped at minimum. The parking lot shall be maintained in good condition in perpetuity.
50. Monument Sign. The damaged monument sign shall be repaired and maintained in good condition.
51. Concrete Curbs. Damaged concrete curbs along driveways from Orange Avenue to the building shall be repaired or replaced with concrete curbs matching the predominant existing concrete curbs as needed and maintained in good condition.
52. Chain Link/Barbed Wire Screen Fence Replacement. The existing chain link fence with barbed wire on the south of the building and visible from the public right-of-way shall be replaced with metal fencing matching the adjacent gate or another fence or wall type following separate Planning and Building Department review and consideration for approval of the specific material and finish color.
53. Building Exterior. The building exterior shall be powerwashed/cleaned as needed.

54. Metal Railing Repair. The metal railing to the north of the office portion of the building at the north of the property shall be repaired/straightened as needed or replaced following consultation with the Planning and Building Department.
55. Exterior Dust Collector. The exterior dust collection system shall be maintained as a single color. Changes to the color shall be reviewed by the Planning and Building Department for approval consideration. Graffiti on the exterior ductwork shall be painted over to match the predominant paint color of the exterior dust collection system. Advertising on the dust collector is prohibited.

Final Approval

56. At the completion of the project, final approval from the Planning Division shall be obtained. All conditions of approval shall be met prior to final approval by the Planning Division.

SECTION 7. This Resolution shall take effect immediately upon its adoption.

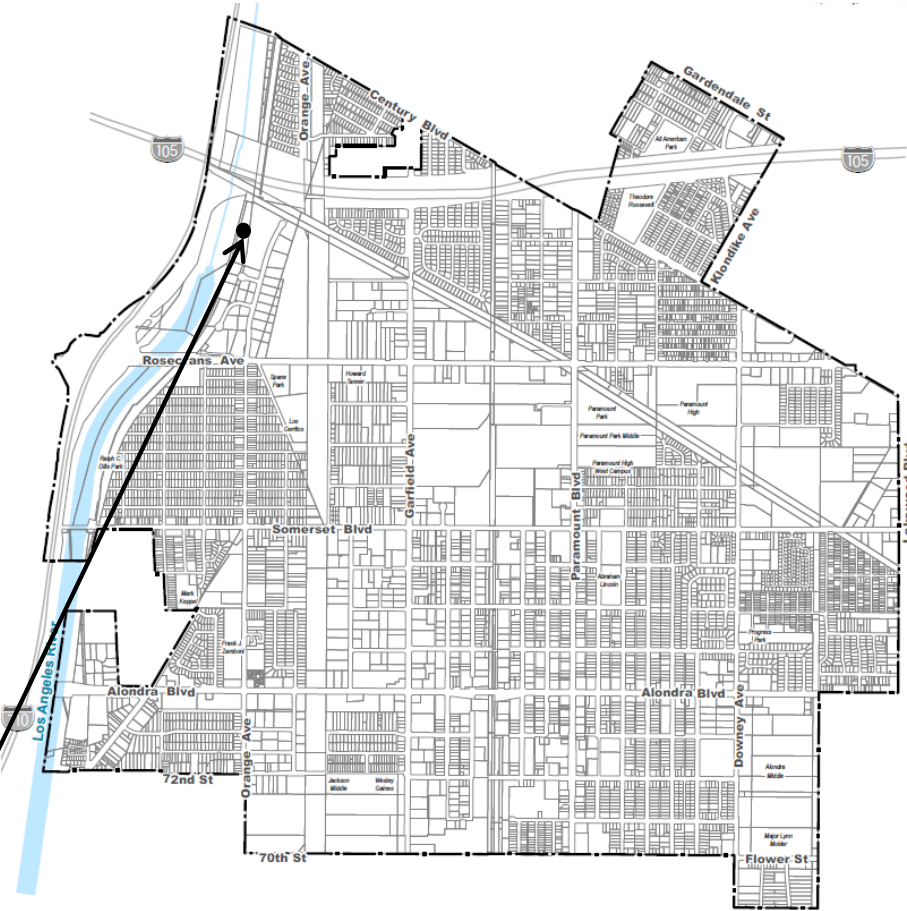
PASSED, APPROVED, and ADOPTED this 1st day of July 2026.

Linda Timmons, Chair

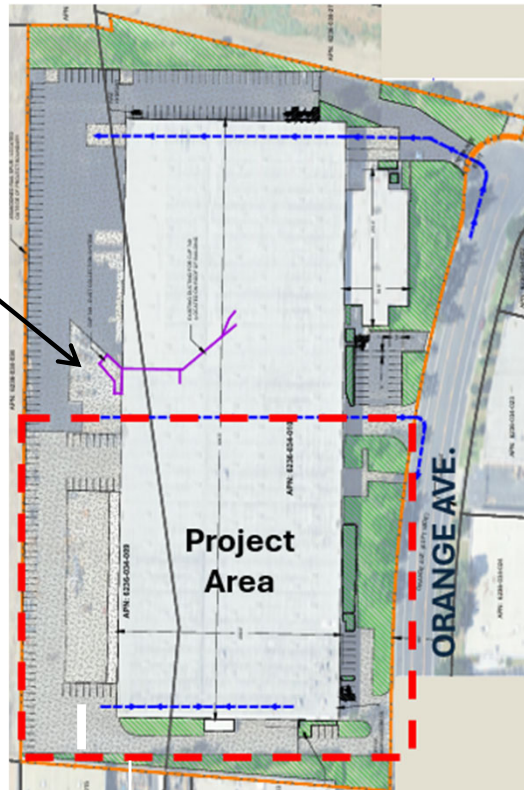
Attest:

Biana Salgado, Administrative Assistant

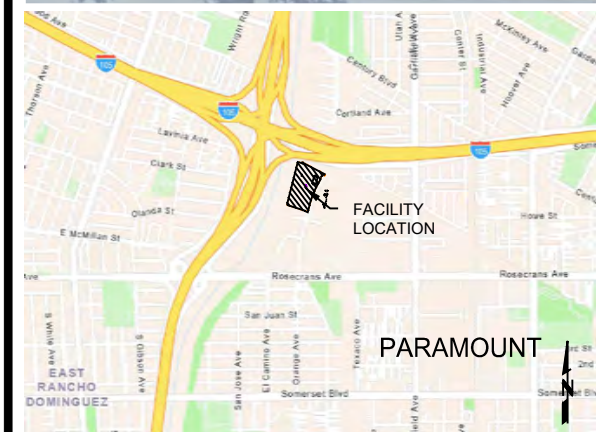
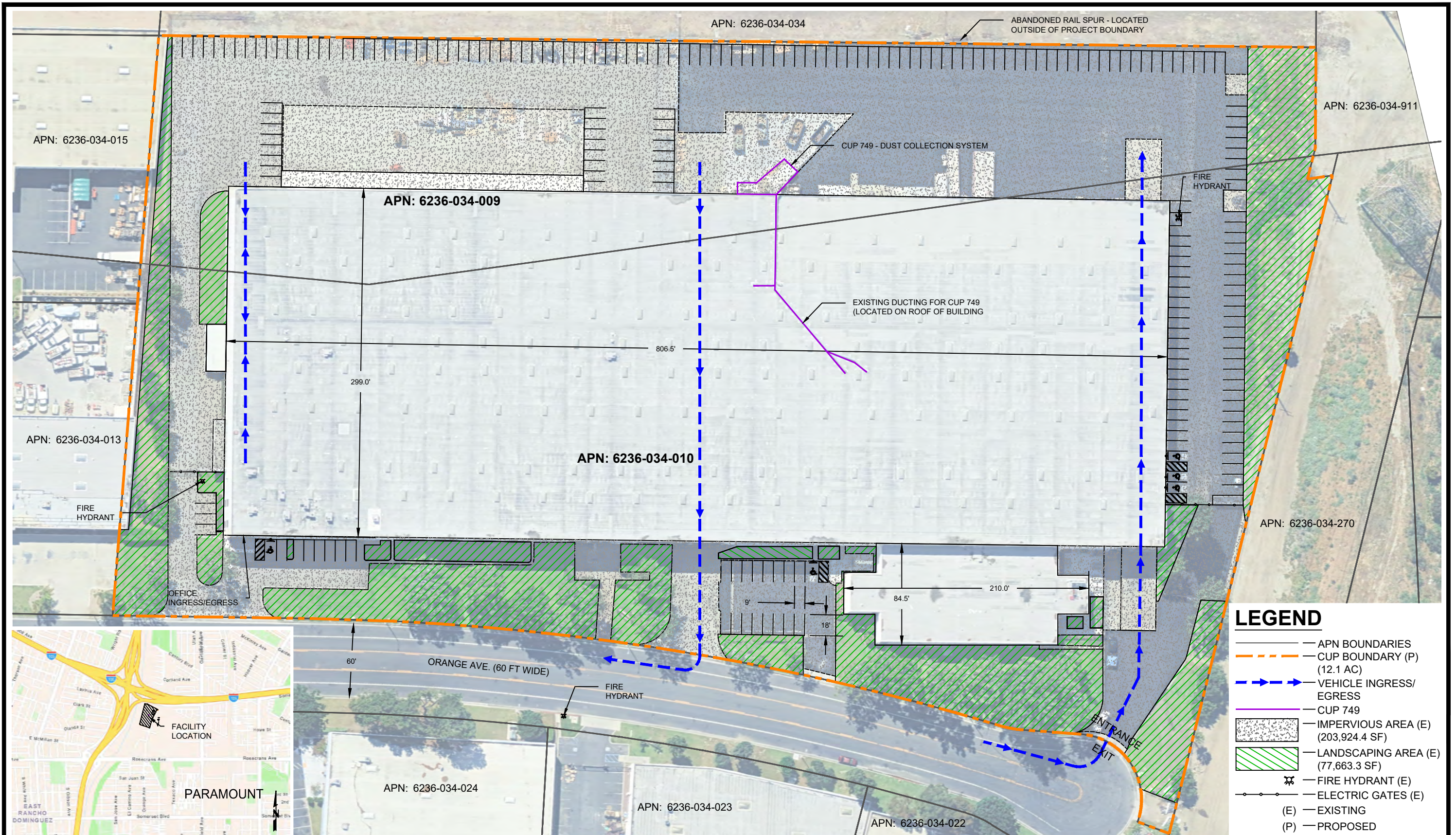
Conditional Use Permit No. 1001



Subject
Property



14001 Orange Ave.



PROPERTY OWNER
ED DREES
14003 ORANGE AVE, PARAMOUNT, CA 90723
(562) 244-5286

DATUM: HORZ= NAD83, CALIFORNIA ZONE 4, US FOOT
VERT=NAVD88

IMAGERY: GOOGLE EARTH, 02/10/2024

PARCELS: LOS ANGELES COUNTY ASSESSOR GIS DATA

PROJECT DESCRIPTION:
INCORPORATE CHEMICAL MILLING AND POLISHING OPERATIONS INTO THE
EXISTING INDUSTRIAL CUTTING OPERATIONS.
APN: 6236-034-009; 6236-034-010 (12.1 ACRES)
BUILDING SIZE: 266,578 SF
ZONING DESIGNATION: M-2 (HEAVY MANUFACTURING)
GENERAL PLAN DESIGNATION: INDUSTRIAL
PARKING SPACES (E): 209
ADA PARKING SPACES (E): 5

80 0 80 160
SCALE OF FEET



SESPE
CONSULTING, INC.
A Trinity Consultants Company.
374 Poli Street, Suite 200 • Ventura, CA 93001
(805) 275-1515 • www.sespeconsulting.com

APPLICANT
A.M. CASTLE & CO., INC.
14001 ORANGE AVE, PARAMOUNT, CA 90723
(818) 864-5374
SHAGE@AMCASTLE.COM
CONTACT: SALIM HAGE

CONSULTANT
SESPE CONSULTING, INC.
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CGOODSON@SESPE.COM
CONTACT: CHRIS GOODSON

CASTLE METALS
SITE PLAN - EXTERIOR
14001 ORANGE AVE,
PARAMOUNT, CA 90723

SCALE: HORIZ. AS SHOWN
VERT. AS SHOWN
DRAWN BY: G.CAMUS
CHECKED BY: MEL

FIGURE NUMBER
1 OF 4

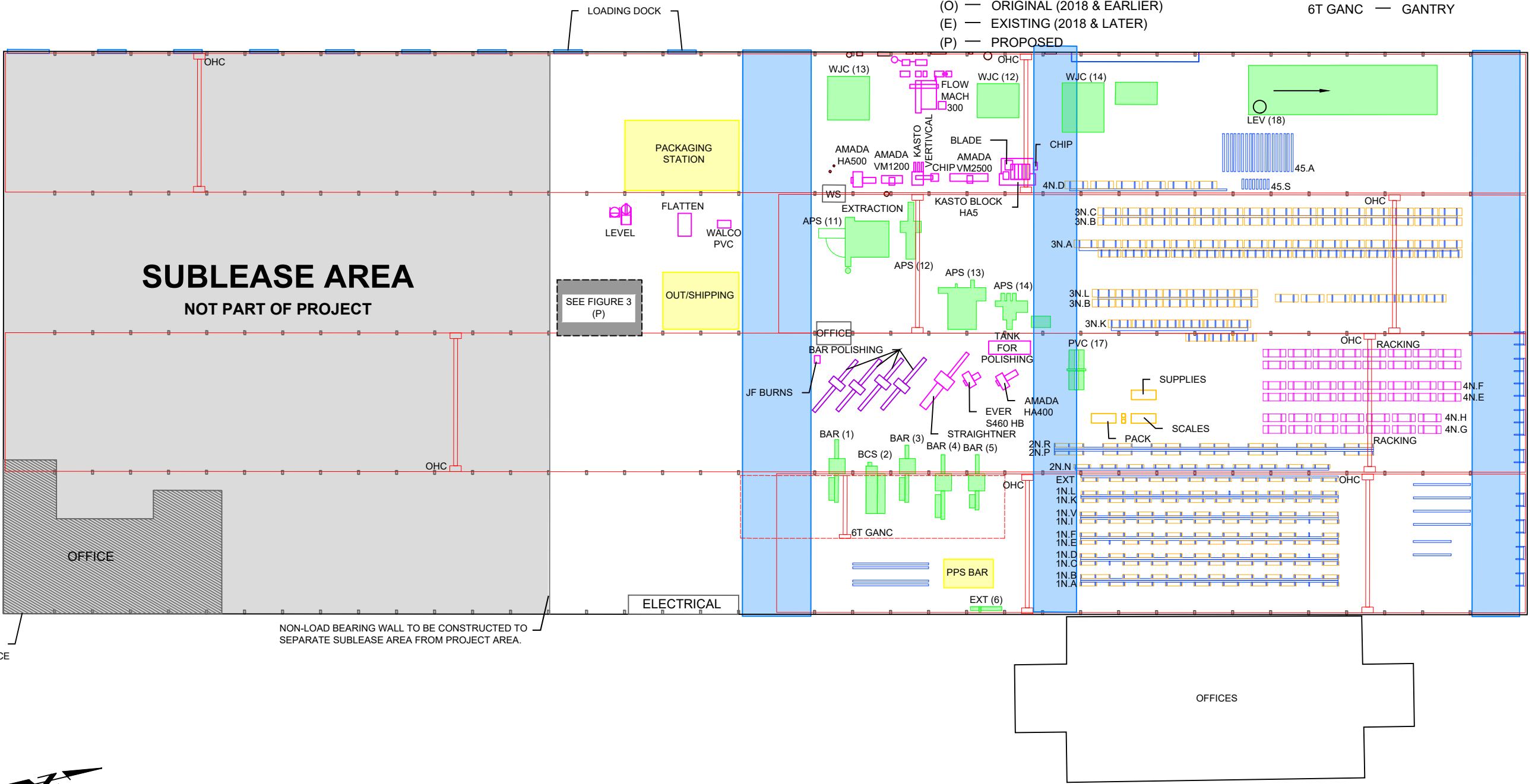
LEGEND

- VEHICLE INGRESS/EGRESS (E)
- LOCATION AREAS (E)
- METAL WORKING EQUIPMENT FOR CUTTING (E)
- POLISHING EQUIPMENT (E)
- MACHINERY FOR CUTTING OPERATIONS (O)
- RACKING (O)
- STRUCTURAL (O)
- OVERHEAD GANTRY CRANES (O)
- (O)

ORIGINAL (2018 & EARLIER)
- (E)

EXISTING (2018 & LATER)
- (P)

PROPOSED
- APS — ALUMINUM PLATE SAW
- BAR — BAR SAW
- BCS — BAR COLD SAW
- EXT — EXTRUSION SAW
- LEV — LEVEL LINE
- NKS — VENDOR OF SLITTER
- OHC — OVERHEAD CRANE
- PVC — SHEET INTERFEAF APPLICATOR
- PPS BAR — PULL PACK SHIP BAR AREA
- SHT — SHEET CUTTER
- 6T GANC — GANTRY



DATUM: HORZ= NAD83, CALIFORNIA ZONE 4, US FOOT
VERT=NAVD88

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ED DREES
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PARAMOUNT, CA 90723
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CASTLE METALS
SITE PLAN - INTERIOR

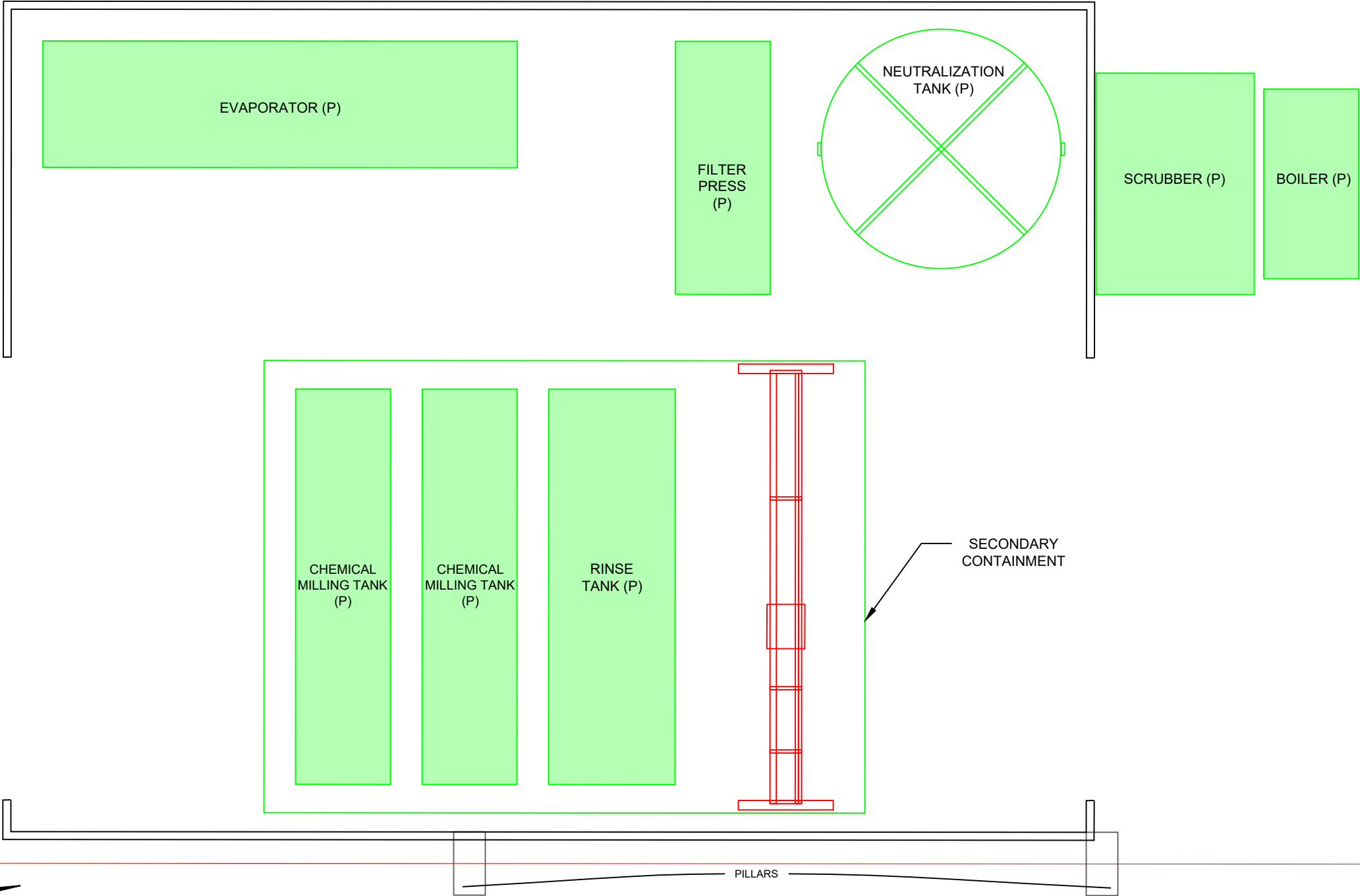
14001 ORANGE AVE,
PARAMOUNT, CA 90723

SCALE: HORIZ: AS SHOWN
VERT: AS SHOWN

FIGURE NUMBER
2 OF 4

LEGEND

- STRUCTURAL (O)
- CHEMICAL MILLING EQUIPMENT (P)
- OVERHEAD GANTRY CRANES (P)
- (O) — ORIGINAL (2018 & EARLIER)
- (E) — EXISTING (INSTALLED IN LATE 2024)
- (P) — PROPOSED (INSTALLATION STARTING IN 2025)



4 0 4 8
SCALE OF FEET

DATUM: HORZ= NAD83, CALIFORNIA ZONE 4, US FOOT
 VERT=NAVD88

PROPERTY OWNER
ED DREES
14003 ORANGE AVE,
PARAMOUNT, CA 90723
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CONCEPTUAL DRAFT - NOT
FOR CONSTRUCTION

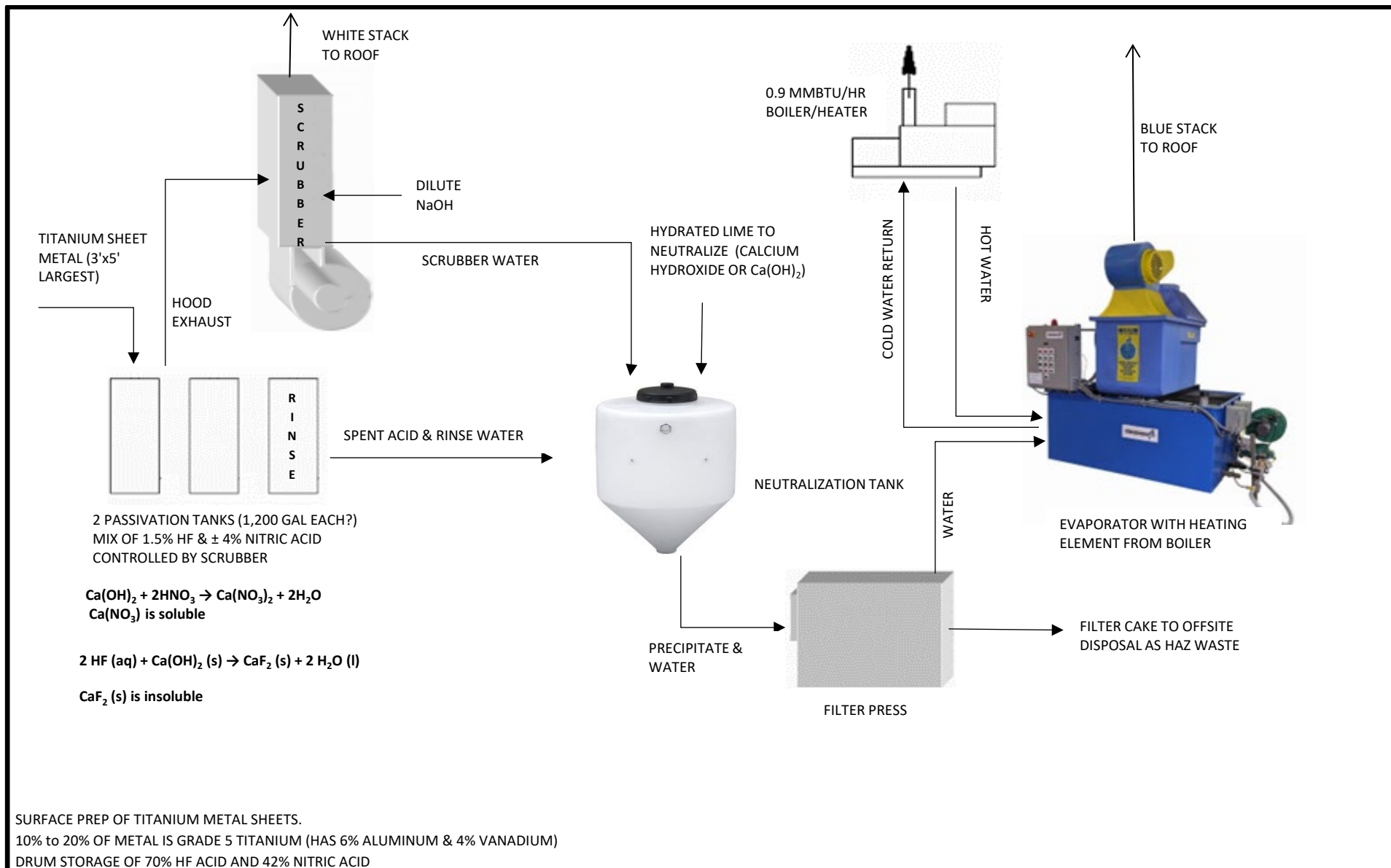
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(805) 275-1515 • www.sespeconsulting.com

CASTLE METALS
SITE PLAN - INTERIOR
CHEMICAL MILLING ROOM

14001 ORANGE AVE,
PARAMOUNT, CA 90723

SCALE: HORIZ. AS SHOWN
 VERT. AS SHOWN
DRAWN BY: G.CAMUS
CHECKED BY: MEL

FIGURE NUMBER
3 OF 4



CONCEPTUAL DRAFT - NOT
FOR CONSTRUCTION

SESPE
CONSULTING, INC.

A Trinity Consultants Company.

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(805) 275-1515 • www.sespeconsulting.com

PROCESS FLOW DIAGRAM

14001 ORANGE AVE,
PARAMOUNT, CA 90723

SCALE: HORIZ. AS SHOWN
VERT. AS SHOWN
DRAWN BY: G.CAMUS
CHECKED BY: MEL

FIGURE NUMBER

4 OF 4

February 27, 2026

City of Paramount, Planning Division
16400 Colorado Avenue
Paramount, California 90723
(562) 220-2036
planning@paramountcity.com

Subject: Conditional Use Permit Application for Industrial Processing Operations at the Castle Metal Facility located at 14001 Orange Avenue (APNs: 6236-034-009 and 6236-034-010)

Dear City of Paramount,

Sespe Consulting, Inc. ("Sespe") is submitting the following Conditional Use Permit ("CUP") application package on behalf of A.M. Castle, Inc. ("Castle") for the Castle Metals Facility located at 14001 Orange Avenue within the City of Paramount (Assessor's Parcel Numbers ["APNs"] 6236-034-009 and 6236-034-010). Specifically, Castle is seeking to memorialize their existing titanium, aluminum, and steel processing operations, as well as add new chemical milling operations at their existing facility, through approval of a new CUP (hereinafter referred to as the "Project").

The existing operations (i.e., titanium, aluminum, and steel processing) currently occurring at the facility, and new proposed chemical milling operations, are classified as the "manufacture, processing, or treatment of articles from previously prepared metal materials," per the City's applicable definitions found in Zoning Code Sec. 17.36.040. No changes are proposed to the site's existing zoning designation, general plan designation, or land use classification. Other than the chemical milling, no new onsite operations are proposed to occur onsite at this time. All operations, including the proposed chemical milling, would continue to occur completely indoors. There are no proposed changes to the existing building's footprint or exterior. Refer to the attached Project Description for additional details regarding both the existing onsite operations, as well as the chemical milling operations.

In addition to the required City application forms and supplemental materials, this application also includes two detailed technical reports, specifically a Transportation Memorandum and an Air Quality Impact Analysis ("AQIA"). The Transportation Memorandum evaluates transportation activity, vehicle miles traveled, and onsite parking availability associated with the proposed Project. The memorandum concluded that the proposed Project is not expected to result in significant traffic-related impacts to the surrounding region, and that existing onsite parking infrastructure would be sufficient to support the proposed Project. The AQIA assess whether the proposed Project would generate new air emissions that could be considered significant pursuant to the California Environmental Quality Act ("CEQA"), or that would conflict with applicable rules and regulations promulgated by the South Coast Air Quality Management District ("AQMD"). The AQIA also included a detailed health risk analysis to evaluate

whether the Project would emit air toxics that could adversely affect onsite workers and nearby human populations. Based on the analysis, the proposed Project would not result in new significant air quality or health risk impacts. Refer to the attached Transportation Memorandum and AQIA for additional details.

We look forward to working with the City on this Project. This package includes a detailed Project Description, application forms, figures, technical reports, and supporting documentation that comprise the CUP application package consistent with the City's requirements. Please call me or Chris Goodson, at (805) 275-1515 if you have any questions or if you need additional information.

Thank you,



Melanie Lewison
Project Manager
Sespe Consulting, Inc.

ATTACHMENTS:

- A. Project Description
 - 1. Conditional Use Permit Application Forms
 - 2. Figures
 - 3. Transportation Memorandum
 - 4. Air Quality Impact Analysis
 - 5. Hazardous Materials Inventory Matrix Reports

ATTACHMENT A

Castle Metals Project Description



A Trinity Consultants Company

3990 Old Town Ave, Suite A203 • San Diego, CA 92110
Office (805) 275-1515 • Fax (805) 667-8104

PROJECT DESCRIPTION

CONDITIONAL USE PERMIT

A.M. Castle, Inc.

**14001 Orange Avenue
Paramount, California 90723**

February 2026

Prepared for: Planning Division
City of Paramount
16400 Colorado Ave
Paramount, California 90723
(562) 220-2036

Prepared by: Sespe Consulting, Inc.
3990 Old Town Ave, Suite A203
San Diego, California 92110
(805) 275-1515

PROJECT DESCRIPTION

Conditional Use Permit
Paramount, California

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ATTACHMENTS

- Attachment 1 – Conditional Use Permit Application Form
- Attachment 2 – Figures
- Attachment 3 – Transportation Memorandum
- Attachment 4 – Air Quality Impact Analysis
- Attachment 5 – Hazardous Materials Inventory Matrix Reports

PROJECT DESCRIPTION

Conditional Use Permit Application City of Paramount, California

1.0 PROJECT OVERVIEW

A.M. Castle, Inc. (“Castle”) is seeking approval of a new Conditional Use Permit (“CUP”) to memorialize existing titanium, aluminum, and steel processing operations, as well as add new chemical milling operations at the existing Castle Metals facility (hereinafter referred to as the “Project”).

The facility occupies a 266,578 square foot (“SF”) industrial building within Assessor’s Parcel Numbers (“APN”) 6236-034-010 and 6236-034-009 totaling 12.1 acres at 14001 Orange Avenue within the City of Paramount (“City”), California. The facility has been in operation since 2013 and has a zoning designation of “Heavy Manufacturing – M-2” and a general plan designation of “Industrial.” The current, ongoing operations and new chemical milling operations are classified as “manufacture, processing, or treatment of articles from previously prepared metal materials,” as defined in City Zoning Code Sec. 17.36.040. No changes are proposed to the site’s existing zoning designation, general plan designation, or land use classification.

1.1 Request

The proposed Project would include new processing methods that would chemically mill titanium, aluminum, and steel in addition to the existing precision cutting, straightening, and polishing activities. All proposed operations would occur entirely within the existing building. The chemical milling process involves submerging the chosen material (i.e., titanium, aluminum, or steel sheets) in an etching solution (i.e., diluted acids), which reacts with the metal to remove excess material and create the desired shape or pattern. While diluted acids would be used during operations, no acid manufacturing would occur onsite. The spent acids will be stored and disposed of in accordance with local, state, and federal regulations.

The etching solution, containing approximately 1.5% hydrofluoric acid and 4% nitric acid, would be stored in two 1,400-gallon chemical milling tanks. The spent acid solutions and rinse water from the tanks would be piped into a neutralization tank, where hydrated lime (i.e., calcium hydroxide) would be added until the pH is neutralized. Solids and water from the neutralization tank would be separated in a filter press, and the resulting filter cake would be shipped offsite to a licensed hazardous waste facility in accordance with local, state, and federal laws. The neutralized water would be boiled off, and fumes from the chemical milling tanks would be sent to a scrubber, where diluted sodium hydroxide would be added to ensure neutrality prior to exhausting water vapor via a roof stack. Refer to Figures 3 and 4 in Attachment 2 for the location of the proposed chemical milling equipment and the corresponding process flow diagram, respectively.

Note that the chemical milling equipment shown in Figure 3, Attachment 2, has not yet been installed at the facility. The new chemical milling and the associated equipment proposed for installation are as follows:

- Evaporator Hot Tank: 60” x 72” x 60” deep tank with a polypropylene evaporator unit, fan mount on the top, recirculation pump, and a heat exchanger.
- Filter Press: Four cubic feet capacity.

- Neutralization Tank: One fiberglass reinforced plastic (“FRP”) conical bottom tank, 96” diameter x 120” tall, with a 2,400-gallon capacity.
- Fume Scrubber: 9,500 cubic feet per minute (“CFM”).
- Boiler: 0.9 million British thermal units per hour (“MMBTU/hr”).
- Chemical milling tanks: Two tanks, 36” x 150” x 60” deep, each with a 1,400-gallon capacity.
- Rinse tank: One tank, 48” x 150” x 60” deep, with a 1,400-gallon capacity.
- Overhead gantry Crane: Hoist and painted steel structure I-beam.
- Secondary containment area: 312” x 408” x 6” deep with a 3,300-gallon capacity to be constructed under the chemical milling tanks and the rinse tank.
- Ventilation hood: One common fiberglass reinforced plastic (“FRP”) side lip exhaust hood with 28” diameter duct connection to be mounted on the Evaporative Hot Tank.
- FRP Duct and Fittings: From the scrubber to the floor-mounted fan and ventilation hood at the chemical milling and rinse tanks.

As noted, all proposed operations would occur entirely within the existing building. No changes to the building’s exterior, parking, lighting, ingress/egress routes, or landscaping are proposed as part of this Project.

1.2 Process Operation Summary

The following lists the typical steps of normal operations that are currently occurring onsite (i.e., Steps 1-4, 6), as well as the addition of the proposed chemical milling operations (i.e., Step 5). It is important to note that the order of operations may differ based on the desired end product.

Step 1 – Material Intake

Incoming metal materials, typically in coil form or pre-cut sheets, are delivered by semi-trucks to the site, entering the premises via Orange Avenue. Upon arrival, trucks access the designated roll-up door on the right-hand side of the building, as indicated in Figure 1, Attachment 2, which illustrates truck ingress/egress routes. The trucks proceed to one (1) of two (2) assigned receiving areas within the building, where the material is unloaded and transferred by forklifts and the existing overhead crane system to the racking areas. These racking areas serve as organized storage points for the material until it is used for processing. The locations of the racking areas are detailed in Figure 2, Attachment 2.

Step 2 – Existing Processing Operations – Straightening

The initial phase of the metal processing operations involves straightening the metal coils to prepare them for subsequent precision operations. The existing onsite straightening equipment utilizes a series of adjustable rollers and leveling systems, which incrementally bend the coil material to achieve a uniformly flat sheet. Precision controls regulate roller pressure, alignment, and speed to accommodate varying metal thicknesses and alloys. Once the optimal material integrity and surface finish are obtained, the straightened metal sheets are transferred to the cutting equipment. Refer to Figure 2, Attachment 2 for the location of the existing straightening equipment.

Step 3 – Existing Processing Operations – Cutting

Following the straightening process, the flattened metal sheet moves onto the cutting phase. This stage employs high-precision machinery equipped to cut the metal into the desired dimensions as specified by Client orders. Common equipment currently used onsite for cutting operations includes sheet cutters, aluminum plate saws, extrusion saws, and bar saws. Depending on the desired dimensions, metal coils

may also be placed directly onto the existing slitting machine to precisely cut the large rolls into narrower, more manageable widths.

Step 4 – Existing Processing Operations – Polishing

Following the cutting phase, the metal would be transferred to either the polishing or chemical milling phase. The polishing phase may also occur following the chemical milling phase, as needed. The polishing phase involves the use of mechanical bar polishing machines to refine the surface finish of the cut metal. Sheets are passed through automated polishing stations equipped with rotating wheels or belts, which incrementally remove surface imperfections and enhance reflectivity. Key process parameters, such as abrasive grit size, wheel speed, and applied pressure, are controlled to achieve specified roughness values and surface quality. Refer to Figure 2, Attachment 2, for the location of the existing bar polishing equipment.

Step 5 – Proposed Processing Operations – Chemical Milling

The chemical milling process would occur in the proposed “chemical milling room” located within the central area of the existing building. Once the metal material has been straightened, cut, and polished, the metal would be chemically milled to achieve the Client’s desired shape or pattern. A protective film known as a “maskant” would be applied to the metal sheets to prevent desired areas from being removed by the solution. Once the maskant is applied, the metal sheets would be submerged in an etching solution (i.e., diluted acids), which would react with the metal to remove excess material and create the desired shape or pattern. While diluted acids would be used during operations, no acid manufacturing would occur onsite.

Step 6 – Packaging and Material Export

Once the desired final product has been created to the requested specifications, the metal materials are packaged in the site’s designated packaging station area. Completed packages may be stored onsite until scheduled for shipment. On the day of export, the packaged materials are loaded onto semi-trucks using the existing overhead crane system in the shipping area. Refer to Figure 2, Attachment 2, for the location of the existing packing station and shipping areas.

2.0 JUSTIFICATION

The following questions (i.e., No. 1-4) are sourced from the City’s Conditional Use Permit Application form, followed by responses to each questions specific to the proposed Project.

1. Describe how the proposed use will not adversely affect properties in the surrounding area or the permitted uses thereon.

The existing and proposed operations would occur entirely within the footprint of the existing facility, eliminating the need for exterior construction or changes that might disrupt neighboring permitted uses. As operations would continue to occur indoors, there would be no significant increases in noise or visual impacts to the surrounding area.

Moreover, the City’s General Plan, adopted in 2007, recognizes industry as an *“important land use in Paramount serving as the cornerstone in the City’s continued vitality. The implementation of these policies listed below will assure the maintenance and preservation of the City’s industrial base.*

Land Use Element Policy 14: The City of Paramount will encourage the continued revitalization of its industrial districts to accommodate economic development and growth.

Land Use Element Policy 15: The City of Paramount will promote the development of modern and attractive business parks that will enhance the community's economic well-being."

The continued operation of the facility supports the City's recognition of industrial uses as the cornerstone of the City's continued vitality. Castle is proposing to memorialize existing operations as well as add new chemical milling processes, all within the existing building's footprint, resulting in no new exterior construction or land disturbance. This approach supports the City's economic growth without affecting nearby properties.

Castle is proposing to increase average daily employee automobile trips from 30 to 33 and increase average daily truck trips from eight (8) to ten (10). Sespe Consulting, Inc. ("Sespe") prepared a Transportation Memorandum to determine if this nominal increase in daily automobile and truck trips would adversely affect surrounding streets and highways, and found that the proposed Project would not have significant transportation-related impacts on the surrounding road network. The memorandum also found that the site's existing off-street parking would continue to be sufficient for the proposed operations. For additional details, refer to Attachment 3 for the full Transportation Memorandum.

Trinity Consultants prepared an Air Quality Impact Analysis ("AQIA") dated February 2026 to evaluate if the proposed Project would generate new air emissions that could adversely affect properties in the surrounding area. The AQIA concluded that while the Project would generate new pollutant emissions, the emissions quantities would be minimal and would not have a significant impact on long-term air quality in the surrounding area, or potential health risks to nearby human populations.

In summary, the approval of this CUP would allow the facility to continue to strengthen local industry and support the City's policies without generating new adverse effects to the surrounding area or the permitted uses thereon.

2. Describe how the proposed use of the site is adequate in size and shape to accommodate said use and all yards, wall, fences, parking and loading facilities, landscaping, and other development features and requirements in order to integrate said use with uses in the surrounding area.

The proposed Project operations would occur entirely within the footprint of the existing building, and no exterior modifications to fencing, parking, loading areas, landscaping, or other site development features are necessary. The current layout of the building is well-suited to accommodate all phases of the existing operations and the proposed chemical milling operations while maintaining efficient movement of materials between process stations. Designated areas for straightening, cutting, polishing, packaging, and shipping are already established on site. The proposed chemical milling operations would occur entirely within an existing room located within the central area of the existing building. Figure 2 in Attachment 2 demonstrates that the facility's capacity and organization are adequate to accommodate the existing and proposed operations. Overall, the site's existing features and internal workflow are more than adequate to support the proposed use, ensuring compatibility with neighboring properties and the broader community.

3. Describe how the site is served by streets and highways, which are adequate to carry the quantity and kind of traffic which will be generated by the proposed use.

The site is located less than one mile from Interstate 710 (“I-710”), a major traffic corridor, which connects to the Project site via Rosecrans Avenue to Orange Avenue. This proximity ensures that traffic generated by the facility is quickly dispersed onto regional roadways, minimizing localized congestion and avoiding roads within residential areas.

Castle currently employs 30 personnel and is seeking to add three additional employees, for a total of 33 employees. This increase would result in a rise in daily employee automobile trips from 30 to 33 round-trips. The Transportation Memorandum prepared by Sespe reviewed State guidance and found that projects that generate 110 or fewer average daily one-way automobile trips are presumed to result in less than significant CEQA impacts. The combined 66 one-way trips (including both the existing and proposed) fall well below this threshold, thereby categorizing the Project as a “small project” with no anticipated significant transportation impacts, and is not required to undergo a VMT analysis.

The facility currently accommodates an average of eight (8) heavy-duty truck round-trips each day for deliveries and pickups. The proposed Project would increase the number of heavy-duty truck trips by two (2), for an average total of ten (10) round-trips per day. The timeframes in which material deliveries typically occur would not change, nor would there be changes to the current traffic patterns or truck delivery routes. The City’s existing roadway network has capacity to accommodate the nominal average increase of three (3) additional truck trips per day, there would be no transportation impacts associated with heavy-duty vehicles.

In summary, the proposed Project would not generate significant additional traffic on City roadways or within the surrounding areas; therefore, the streets and highways that serve the facility would be adequate to carry the traffic generated by the proposed use. For additional details, refer to Attachment 3 for the full Transportation Memorandum prepared by Sespe in February 2026.

4. Describe how the use is necessary or desirable for the development of the community and is not detrimental to existing uses or permitted uses in which the use is proposed to be located.

The proposed Project is both necessary and desirable for the continued development of the community. As described in response to Justification Question #1 above, industrial uses are explicitly supported as a fundamental element for local economic growth and long-term stability. The Project will continue existing operations while adding chemical milling processes entirely within the current building footprint, requiring no changes to the site’s industrial zoning or exterior site features. This ensures that the permitted industrial function remains compatible with surrounding uses and upholds the integrity of the established industrial area.

The proposed operational changes would not be detrimental to neighboring uses or permitted activities, as processes will continue to be contained indoors and the site is adequately buffered by existing industrial infrastructure. Overall, the proposal supports the City’s strategic objectives by strengthening the industrial base without adverse effects to the community or surrounding land uses.

3.0 BACKGROUND INFORMATION

The following sections provide specific Project details, as requested in the City’s Conditional Use Permit Application – Environmental Information Form (see Items #1 through #10). Refer to Attachment 1 for the full application packet.

3.1 General Information (Items #1-10)

- | | |
|-----------------------------------|---|
| 1. Applicant: | A.M. Castle, Inc.
14001 Orange Avenue
Paramount, California 90723 |
| 2. Project Address: | 14001 Orange Avenue
Paramount, California 90723 |
| Assessor’s Parcel Numbers: | 6236-034-009 (3.7 acres); 6236-034-010 (8.4 acres) |
| Property Owner: | Ed Drees
14003 Orange Avenue
Paramount, California 90723
(562) 244-5286 |
| 3. Applicant Contact: | Salim Hage, Operations Manager
A.M. Castle, Inc.
14001 Orange Avenue
Paramount, California 90723
(818) 854-5374
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| Consultant Contact: | Melanie Lewison, Project Manager
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Christopher Goodson
Sespe Consulting, Inc.
374 Poli Street, Suite 200
Ventura, California 93001
(805) 275-1515
cgoodson@sespeconsulting.com |
| 4. Application Number | To be provided by Paramount staff. |
| 5 Other Required Approvals | See Table 1 below. |

Table 1 – Other Required Permits, Entitlements, and Approvals

Required Approval/Permit	Description
Permit to Operate	Obtain a Permit to Operate from the South Coast Air Quality Management District.
Tiered Permitting	Obtain tiered permitting from the Los Angeles County Fire Department (“LACOFD”) for the neutralization of spent acid, a waste product of the chemical milling process. LACOFD is the local Certified Unified Program Agency (“CUPA”) that would be responsible for tiered permitting in the Project area. A similar acid neutralization process is currently operating in Camarillo, California, under tiered permitting overseen by the Ventura County Environmental Health Division, the local CUPA.

- 6. Existing Zoning District:** “Heavy Manufacturing” M-2
 Land use designation: Industrial
- 7. Proposed Project:** The Project is proposing to incorporate chemical milling operations into the site’s existing industrial operations under Castle Metals. The proposed operations would continue to fit under the land use “manufacture, processing or treatment of articles from previously prepared metal materials” land use (Sec. 17.36.040). Chemical milling operations would occur within the existing building and would not change the site or exterior of the building.
- 8. Site Size** 12.1 acres
- 9. Square Footage** The existing industrial building is 266,578 SF. No changes are proposed to the size of the building.
- 10. Associated Project:** Castle is seeking to memorialize the existing titanium, aluminum, and steel processing operations (i.e., precision cutting, straightening, and polishing), as well as adding new chemical milling operations at the existing facility.

4.0 PROJECT DESCRIPTION/ENVIRONMENTAL SETTING

The following sections provide specific Project details, as requested in items #11 through #33 of the City's Conditional Use Permit Application – Environmental Information Form. Please refer to Attachment 1 for the full application packet.

4.1 Parking (#11)

Presently, the site provides 209 standard off-street parking spaces and five ADA-compliant off-street parking spaces, totaling 214 available off-street parking spaces. The operational characteristics of the facility demonstrate that the existing parking supply is more than sufficient to meet actual onsite demand, including the nominal additional automobiles and trucks that would travel to and from the facility as a result of the Project. Considering there are 214 available parking spaces, and that the Project currently employs 30 full-time onsite employees and the proposed addition of only three (3) additional full-time staff, the facility would have, on average, 181 parking spaces remaining each day available for onsite visitors. Given the industrial nature of the site and the relatively low number of employees, the demand for parking at the facility is significantly low. Therefore, Castle proposes that the current parking configuration is sufficient to support both existing and proposed operations without compromising functionality or accessibility. Refer to Figure 1, Attachment 2, for the location of the existing parking spaces.

4.2 Proposed Scheduling (#13)

Following approval of this CUP, the facility would continue its existing industrial operations (i.e., titanium, aluminum, and steel processing operations) as shown in Figure 1, Attachment 2. The existing room where chemical milling is proposed to occur would undergo retrofitting to incorporate engineered secondary containment and ventilation systems. These improvements would be completed prior to the installation and commissioning of the chemical milling equipment to ensure regulatory compliance and operational safety. Any onsite improvements would be constructed during daytime hours only, specifically during normal business hours.

4.3 Project Incremental Development (#14)

As discussed above, the existing room where chemical milling is proposed to occur would undergo retrofitting to incorporate engineered secondary containment and ventilation systems. Retrofitting is expected to take six to 12 months to complete. No changes to the size of the existing industrial building or exterior are proposed as part of this Project.

4.4 Industrial Project Characteristics (#17)

4.4.1 Type of Industrial Uses

The existing industrial processing operations (i.e., precision cutting, straightening, and polishing activities) are classified as “manufacture, processing, or treatment of articles from previously prepared metal materials.” The proposed chemical milling operations would also fall under the same industrial land use as processing operations; therefore, there are no proposed changes to the site's existing land use or zoning designation, and the nature of onsite industrial operations would generally remain the same.

4.4.2 Employment and Hours of Operation

As stated above, the existing facility currently employs 30 full-time employees, and the proposed Project would add three (3) additional full-time employees. The facility would also continue to operate from 7:00 AM to 3:00 PM, Monday through Friday. There are no proposed changes to the days or hours of current operations.

4.4.3 Loading Facilities

The facility is equipped with multiple designated loading areas within the existing structure. Incoming trucks delivering materials utilize two (2) established receiving zones: the first, accessible from Orange Ave. via the primary roll-up door on the building's right-hand side; the second, located at the rear of the building through an additional roll-up access point. Trucks for outbound shipments would enter through the rear of the building and would exit out of the front onto Orange Ave.

The Project does not propose modifications to onsite truck routes, roll-up doors, or driveway configurations. Refer to Figures 1 and 2 in Attachment 2 for the locations of the existing truck routes and loading and staging areas.

4.5 Application Type (#19)

The application type for this Project would be a CUP per Section 17.36.040 of the City's Zoning Ordinance.

4.6 Existing Physical Features (#20)

The proposed Project would occur entirely within the existing facility and no changes are proposed to occur outside of the existing building. No outdoor operations are proposed as part of this Project. Additionally, the Project site is located within a developed and industrial area of the City, with no nearby sensitive natural land features. Therefore, no impacts to existing land features (e.g., hills, bays, rivers) would occur as part of this Project.

4.7 Scenic Resources (#21)

As previously noted, the proposed Project would be confined entirely within the existing facility, which is situated in a densely developed industrial area of the City. The proposed Project would not involve any expansion of the building's existing footprint, nor does it propose modifications to the exterior facade or the surrounding area. Additionally, the Project site is not located within any designated scenic resource area. By maintaining operations within the existing facility and avoiding changes to the external environment, the Project ensures there will be no change to scenic resources in the vicinity.

4.8 Pattern, Scale, and Character of the Surrounding Area (#22)

The proposed Project would not change the established pattern, scale, or character of the surrounding industrial area. The proposed operations would occur entirely within the existing facility, ensuring that no expansion of the building or modification to the exterior facade would occur. Furthermore, all operational activities, including the transport and handling of materials, would continue to utilize existing internal circulation routes and loading areas. Overall, the Project's implementation would preserve the existing built environment and uphold the long-standing industrial character of the surrounding community.

4.9 Solid Waste (#23)

The Project does not involve solid waste, recycling, green waste processing, or composting operations.

4.10 Air Quality (#24)

The facility's existing operations are conducted entirely indoors, and the proposed operations would likewise occur indoors. As no changes to the facility's exterior are proposed, the Project would not result in changes in dust, ash, smoke, fumes, or odors in the vicinity. To evaluate potential air quality impacts, Trinity Consultants prepared an AQIA dated February 2026 which determined that implementation of the Project would not result in a significant increase in dust, ash, smoke, fumes, or odors in the vicinity of the Project site.

The AQIA looked at the current conditions and compared them to expected conditions following Project implementation. The emissions associated with the proposed Project were found to be below applicable regulatory thresholds, meaning that they would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment. The AQIA also performed a health risk assessment to estimate potential cancer risk and non-cancer chronic and acute hazards from toxic air contaminants (TACs) and concluded that nearby workers, residents, and other sensitive receptors would not be exposed to significant levels of air pollutants as a result of this Project. The AQIA also determined that the existing and proposed operations are not anticipated to be odor sources given their nature. The facility has also not had a history of adverse odor releases. Refer to the full AQIA prepared by Trinity Consultants, included in Attachment 4, for additional details.

4.11 Drainage and Site Grading (#25 and #27)

The proposed Project would occur entirely within the existing facility and would not involve any grading or groundbreaking activities that would alter the quality or quantity of existing drainage features within and near the facility. No new impervious surfaces are proposed as part of this project, and therefore, there are no proposed drainage changes or grading activities for this Project. The facility has coverage under the Industrial General Permit for Storm Water Discharges (“IGP”), Waste Discharge Identification Number 4 19I024276. The facility’s Storm Water Pollution Prevention Plan (“SWPPP”) details runoff patterns, drainage areas, and industrial areas of the facility. The SWPPP’s site map shows surface flow directions and where discharge samples are collected during Qualifying Storm Events (“QSEs”): a storm drain west of the approximate mid-point of the building and where surface flow discharges to Orange Avenue at the northeastern corner of the facility. The existing SWPPP is a living document, and will be updated as needed following Project approval.

4.12 Noise and Vibration (#26)

The proposed chemical milling operations would be conducted entirely within the existing building, specifically in a dedicated room isolated from the rest of the building. The existing facility is situated in a highly developed industrial area of the City, which is characterized by similar industrial uses. Importantly, the proposed operations would utilize equipment and processes that are comparable in use and intensity to those currently in use onsite. Because operations would continue to occur entirely within the interior of the existing enclosed structure, noise and vibration generated by equipment is not anticipated to be audible beyond the property lines. Given this, and considering the robust manufacturing and industrial uses surrounding the site, the proposed operations are not expected to cause a substantial change in the existing noise or vibration levels in the vicinity.

4.13 Hazardous Materials (#28)

The proposed Project would continue to store various hazardous materials onsite that are required for existing operations. Lubricants are used during cutting and polishing operations to reduce friction, prevent material deformation, and provide cooling to the equipment. Abrasives, such as garnet, are used during the cutting phases, resulting in a mixture of spent garnet with titanium, aluminum, and steel. Oily mop water generated during routine cleaning operations is collected in drums and manifested as hazardous waste. All waste from cutting operations would continue to be properly manifested, stored, and disposed of in accordance with applicable regulations. Attachment 5 shows Castle’s current Hazardous Materials Inventory Matrix Report, the facility’s “HazMat” and “HazWaste” records as downloaded from the California Environmental Reporting System (“CERS”).

The Project would add materials used in the chemical milling process. Those chemicals will include most, or all, of the following:

- Stock hydrofluoric acid (70% concentration),
- Stock nitric acid (67.5% concentration),
- Chemical milling solution (a mixture of ~2% hydrofluoric acid and 4% nitric acid),
- Acid waste mixture (spent chemical milling solution),
- Acid neutralization system materials (calcium hydroxide, filter cake),
- Boiler and scrubber system additives (antifoam agents, sodium hydroxide), and
- Acetone (for cleaning finished products).

Attachment 5 also includes an example of the Hazardous Materials Inventory Matrix for Supra Alloys, an identical chemical milling operation occurring in a different jurisdiction. The Supra Alloys information is provided as an example of how the addition of chemical milling and related processes would expand the Hazardous Materials Inventory for the facility. Supra Alloys is in Camarillo, California, and is another facility started by Banner Industries, the original parent company of Castle Metals. As noted, Supra Alloys, Camarillo, has a similar chemical milling process that is currently permitted and operating. Adding chemical milling to this Project would expand the facility's Hazardous Materials Inventory accordingly.

4.14 Municipal Services (#29)

The site is within the jurisdiction of the Lakewood Sheriff's station and LACOFD and is not expected to require an increased level of emergency response services, as industrial operations are already occurring at the site. As the local CUPA, LACOFD would oversee tiered permitting for acid neutralization and regulate hazardous materials and wastes associated with chemical milling.

Non-industrial wastewater generated at the facility is managed through existing connections to the Los Angeles County Sanitation District sewer system. The multiple restrooms already onsite possess sufficient capacity to accommodate the minor increase of three (3) additional employees; therefore, no upgrades to the existing sewer system would be necessary. Currently, there are no plans to discharge the Project's chemical milling wastes or neutralized water to the sanitary sewer system.

The site's water is provided by the Metropolitan Water District of Southern California. Currently, the site's average monthly water usage is approximately 117,000 gallons. Every two (2) to three (3) months, the average monthly water usage would increase by approximately 4,800 gallons as part of chemical milling operations, totaling approximately 121,000 gallons. The remaining month's water usage would remain around 117,000 gallons. Potable water needs would continue to be met by third-party providers or filtration systems connected to the site's tap water system.

4.15 Fossil Fuel Consumption (#30)

The site's electricity is provided by Southern California Edison ("SCE"), and gas is provided by Southern California Gas. Because the majority of the onsite operations (i.e., precision cutting, straightening, and polishing) would not change as a result of the Project, onsite electricity and natural gas consumption would also remain the same. The new chemical milling equipment would be electrified, and therefore may consume some additional quantity of electricity compared to the existing facility; however, this increase is expected to be nominal, and the equipment would be operated on an as-needed basis, and in the most efficient manner possible. Castle has and would continue to have a strong financial incentive, among other reasons, to manage energy and fuel use efficiently and avoid wasteful or unnecessary consumption, consistent with industry best practices.

4.16 Associated Projects (#31)

The purpose of this application is to memorialize the existing titanium, aluminum, and steel processing operations (i.e., straightening, cutting, and polishing) as well as add new chemical milling operations at the existing facility as part of its ongoing “manufacture, processing, or treatment of articles from previously prepared metal materials,” as defined in City Zoning Code Sec. 17.36.040. There are no other associated projects with the proposed request.

4.17 Existing Operations (#32.a)

Castle has been operating in the northernmost building of the existing industrial campus since 2013. Its original unit was assigned the 14001 Orange Avenue, Paramount address. Castle has specialized in the precision cutting of titanium, aluminum, and steel since the inception of this facility in 2013, and serves the aerospace, industrial, and medical sectors.

The existing facility is located within a 266,578 SF industrial building, situated on APN 6236-034-010 and 6236-034-009, encompassing a total of 21.1 acres. The property has a zoning designation of “Heavy Manufacturing – M-2” and a general plan designation of “Industrial.” In 2019, Drees Wood Products, Inc. (“Drees”), a woodworking business specializing in cabinet doors, operated out of the southern portion of the existing 266,578 SF building. At that time, a non-load-bearing partition wall divided the building into two (2) separate units, with Castle occupying the northern unit. Drees’ southern unit was assigned the address 14003 Orange Avenue, Paramount. Drees installed a spray booth for adhesives and a dust collection system while operating at the facility. In mid-2024, Drees vacated the building, and the partition wall was removed, allowing Castle to spread their operations out to occupy the entire building under the 14001 Orange Avenue address. Other than the addition of two (2) new horizontal bandsaws for the existing operations, no new equipment was added to the facility following the removal of the partition wall. Refer to Figure 2, Attachment 2, for the locations of existing equipment.

The facility is monitored continuously by interior and exterior security cameras operating 24/7. Perimeter security fencing encloses the site, with two entrance gates on Orange Avenue that are secured nightly. No modifications to these security protocols are proposed. Emergency vehicle access is facilitated directly from Orange Avenue, with clear navigation along the designated truck route. The facility is equipped with fire extinguishers strategically located throughout the building, as well as smoke and carbon monoxide detection systems. The site’s security and fire prevention measures are monitored by Securitas Security Services USA.

4.18 Existing Physical Features, Environmental Resources, and Other (#32.b)

The existing site is fully developed, including a 266,578 SF industrial building, with associated paved parking areas and landscaping areas along the east and south perimeter. As the site has been fully developed, there are no onsite natural resources beyond the ornamental landscaping and existing trees. As described, no ground-disturbing construction operations are proposed, and the Project would not alter the current topography, soil stability, or scenic aspects, thereby maintaining the integrity of the existing setting.

4.19 Existing Surrounding Properties and Uses (#33)

The existing facility is located within the Orange Industrial Park and is surrounded primarily by industrial and manufacturing operations. Interstate 105 (“I-105”) lies immediately north of the property, with residential neighborhoods located north beyond the freeway. Immediately east of the facility are additional industrial operations, including a sandblasting service and a building materials supplier specializing in windows and doors; residential uses are present further east at increased separation. South

Castle Metals Facility – Project Description

of the site, the land use context remains predominantly industrial, comprising a commercial refrigeration equipment supplier, a concrete contracting operation, a retail distribution warehouse, and other manufacturing-related entities. The western boundary of the property is defined by the Los Angeles River and Interstate 75 (“I-75”).

Attachment 1

Conditional Use Permit Application Form

Attachment 2

Figures

Attachment 3

Transportation Memorandum

Attachment 4

Air Quality Impact Assessment

Attachment 5

Hazardous Materials Inventory Matrix Reports

Date: February 11, 2026

To: Salim Hage – A.M. Castle, Inc.

From: Melanie Lewison – Sespe Consulting, Inc.

Re: Transportation, VMT, and Parking Memorandum for the Castle Metals Facility Project located in the City of Paramount, California

A.M. Castle, Inc. (“Castle”) currently operates the existing Castle Metals facility at 14001 Orange Avenue, located within the City of Paramount, California (the “City”). The existing facility is located on two parcels (Assessor’s Parcel Numbers [“APNs”] 6236-034-009 and 6236-034-010) within the Heavy-Manufacturing M-2 zoning designation and Industrial General Plan designation. Castle is seeking City approval to continue the existing industrial processing operations and incorporate chemical milling operations (herein referred to as the “Project”). The proposed chemical milling operations would chemically mill titanium, aluminum, and steel in addition to the existing precision cutting, straightening, and polishing activities. The Project proposes no physical changes to the facility’s existing footprint (266,578 square feet [“SF”]) or exterior, as the proposed chemical milling operations would operate within the existing facility structure.

This technical memorandum has been prepared by Sespe Consulting, Inc. (“Sespe”) to identify and analyze transportation activity, vehicle miles traveled (“VMT”), and onsite parking availability associated with the Project. Specifically, this memorandum discusses the Project’s potential transportation and parking effects in accordance with the California Environmental Quality Act (“CEQA”) Guidelines Appendix G for transportation, requirements enacted with Senate Bill 743 (SB 743), and relevant sections of the City’s Municipal Code and General Plan. As discussed in greater detail below, the Project would create very minimal increases in the number of automobiles and heavy-duty delivery trucks traveling to and from the facility. Therefore, the Project would not result in a significant increase in vehicles on local City roadways and would therefore not result in significant transportation impacts pursuant to CEQA.

APPLICABLE TRANSPORTATION & PARKING STANDARDS/GUIDELINES

In 2013, the California legislature enacted SB 743, which required, among other things, that the State of California Governor’s Office of Planning and Research (“OPR”) adopt new guidelines for assessing transportation impacts in accordance with CEQA, and that traffic congestion (i.e., Level of Service [“LOS”]) would no longer be considered in determining impacts. The purpose was to better align transportation analyses with the state’s goals of reducing greenhouse gas (“GHG”) emissions and traffic-related air pollution and promoting multimodal transportation networks and diverse land uses.

As a result, by July 1, 2020, all lead agencies have been required to analyze a project’s transportation impacts using the VMT metric. The OPR Technical Advisory (OPR, 2018) document provides guidance for evaluating this

new transportation impact method. Notably, the OPR Technical advisory details that projects with an average daily trip generation of less than 110 trips are classified as “small projects” and are generally considered to have a less-than-significant transportation impact and can be “scoped out” from a more detailed VMT analysis. This “small project” threshold serves as a screening tool to avoid lengthy VMT analyses for projects that are unlikely to significantly increase VMTs.

The City of Paramount, the CEQA lead agency for this Project, has not yet published policies or thresholds specific to the new CEQA Guidelines Section 15064.3 (City of Paramount, 2024). Therefore, the Project’s potential transportation and VMT impacts are presented and quantified utilizing the OPR’s Technical Advisory methods.

The City’s Municipal Code provides provisions for parking standards within each zoning designation. Specifically, section 17.44.460(F)(2)(a) states that operations located within the M-2 zone that exceed 15,000 SF of gross floor area shall provide one off-street parking space for every 500 SF (City of Paramount, 2024). Based on this standard, the existing 266,578 SF facility would need a total of 534 off-street parking spaces to comply with the regulation.

PROJECT DETAILS AND TRANSPORTATION ACTIVITY LEVELS

Other than the inclusion of chemical milling operations at the existing facility, the proposed Project would not involve changes to existing operations. The facility’s existing industrial operations would continue as normal, and the chemical milling operations would commence alongside these existing operations. The proposed chemical milling operations would result in an increase of approximately three (3) onsite employees, as well as two (2) additional heavy-duty truck trips associated with material deliveries and pickups. The inclusion of chemical milling operations at the site would occur entirely within the existing building and would not introduce new vehicle access points, driveways, or on-/off-site circulation patterns.

The facility is located within a developed industrial area of the City and is surrounded to the east and south by other industrial and manufacturing operations. The facility is accessed via a driveway along the northeastern edge of the site connecting to Orange Avenue. Orange Avenue currently provides access to numerous other adjacent industrial operations, and therefore, continued heavy-duty truck traffic on this roadway would not be inconsistent with the existing setting. The Project would not require any changes to the existing ingress/egress points located along Orange Avenue or the general traffic patterns followed by existing heavy-duty trucks and automobiles.

The following sections provide additional details related to existing employee automobile trips and heavy-duty truck trips.

Vehicle/Automobile Activity

Currently, 30 employees work at the existing facility. The Project would result in an increase of approximately three (3) additional employees, resulting in a total of 33 employees onsite under Project conditions. Therefore, there would be a minimal change in the number of commuting employees and associated automobile vehicle trips as a result of the implementation of the Project.

To estimate the average daily commute distance per employee, default trip lengths from the California Emissions Estimator Model (CalEEMod) were utilized. Specifically, CalEEMod indicates that the average home-to-work round-trip distance in urban areas of Los Angeles County – South Coast is approximately 14.7 miles (CalEEMod,

2022). Accordingly, it is estimated that existing operations generate approximately 14.7 VMTs per employee per day (one 7.35-mile inbound trip and one 7.35-mile outbound trip), resulting in a total of approximately 441 VMTs per day.

Under Project conditions, because the Project would increase the number of onsite employees by three (3), the Project's average daily VMTs would increase by 44.1, totaling 485.1 employee VMTs per day. Since the increase in VMTs would be so few, the Project would not result in a significant increase to the existing total daily traffic levels or a.m./p.m. peak hour trips.

Furthermore, as discussed above, in lieu of specific guidance and transportation thresholds provided by the City, OPR's Technical Advisory (OPR, 2018) is utilized. The Project employee vehicle trips are well below the "Small Projects Generating less than 110 Daily Trips" threshold presented in OPR's guidance documents, and therefore, would be "screened out" as having less than significant transportation impacts with respect to CEQA Appendix G Environmental Checklist for Transportation. Specifically, OPR states that *"Projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less than significant vehicle miles traveled (VMT) impact."* (OPR, 2018). The Project would add only three additional automobile round-trips (i.e., six one-way trips) to the existing 30 automobile round-trips (i.e., 60 one-way trips), resulting in a total of 33 automobile trips (i.e., 66 one-way trips). Therefore, the Project's automobile activity would remain well below the applicable screening threshold of 110 trips per day, and therefore would not result in new transportation impacts on nearby roadways.

Truck Activity

Currently, the facility receives and sends out an average of eight (8) heavy-duty truck round-trips each day for deliveries and pickups. These trips primarily occur during regular business hours, from 7:00 am to 3:00 pm, Monday through Friday, with the busiest period between 12:00 pm and 3:00 pm. Based on information provided by Castle, the proposed Project would likely increase the number of heavy-duty truck trips by two (2), averaging a total of ten (10) round-trips per day. The timeframes in which material deliveries typically occur would not change, nor would there be changes to the current traffic patterns or truck delivery routes.

It is important to note that, pursuant to OPR's guidance and Section 15064.3 of the CEQA Guidelines, CEQA transportation evaluations are required to analyze "... 'vehicle miles traveled' [which] refers to the amount and distance of automobile travel attributable to a project. Here, the term 'automobile' refers to on-road passenger vehicles, specifically cars and light trucks." (OPR, 2018). Therefore, heavy-duty trucks, or the movement of goods associated with industrial projects, are excluded from a project's VMT evaluation. For these reasons, there would be no transportation impacts associated with heavy-duty vehicles. Even if these heavy-duty trips were incorporated into the calculation of automobile-related VMTs, the total daily one-way trips would remain below the established threshold of 110, thereby underscoring the project's minimal impact on transportation activity.

Parking Activity

Currently, the site provides 209 standard parking spaces and five (5) ADA-compliant parking spaces, totaling 214 available parking spaces. While this number falls short of the code requirement (i.e., 534 total parking spaces), the operational characteristics of the facility demonstrate that the existing parking supply is more than sufficient to meet actual onsite demand.

As discussed above, Castle currently employs 30 full-time onsite staff, and the proposed Project would introduce only three (3) additional full-time employees. Assuming full attendance of onsite employees, an average of 181 parking spaces would remain available each day for onsite guests.

Given the industrial nature of the site and the relatively low number of employees, the demand for parking at the facility is significantly lower than the code-prescribed threshold. Expanding the parking inventory to meet the zoning requirement would necessitate the removal of existing landscape features and result in construction-related impacts. With the current onsite features, no alternative areas are available to accommodate additional parking spaces, and the current parking configuration would remain sufficient to support the proposed operations without compromising either functionality or accessibility.

CONCLUSION

As summarized above, the Project would only generate three (3) additional automobile round-trips and two (2) additional heavy-duty truck round-trips at the facility. These increases in overall vehicle trips at the Project site fall well below the OPR screening thresholds of 110 or fewer average daily trips. For these reasons, the Project operations would not be considered a significant increase in vehicle activity on City roadways. Furthermore, the current 214 available onsite parking spaces would remain more than sufficient to support the existing and proposed operations. Please review and consider the attached information, and feel free to contact me at (805) 275-1515 if you have any questions or require additional information.

Kind regards,



Melanie Lewison
Sespe Consulting, Inc.

ATTACHMENTS

1. Facility Site Plan

REFERENCES

CalEEMod. (2022). *California Emissions Estimator Model (CalEEMod)*. Sacramento, CA: California Air Pollution Control Officers Association. Retrieved from <https://www.caleemod.com/>

City of Paramount. (2024). Paramount Municipal Code. Paramount, California, USA.

OPR. (2018). *Technical Advisory on Evaluating Transportation Impacts in CEQA*. Sacramento, CA: Governor's Office of Planning and Research. Retrieved from https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

ATTACHMENT 1

Facility Site Plan

AIR QUALITY IMPACT ANALYSIS

Castle Metals Facility

A.M. Castle, Inc.

Prepared For:

A.M. Castle, Inc.
14001 Orange Avenue
Paramount, CA 90723

Prepared By:

TRINITY CONSULTANTS
20 Corporate Park, Ste 285
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949-567-9880

February 2026

Project 250510.0003



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1. EXECUTIVE SUMMARY

Trinity Consultants has completed an Air Quality Impact Analysis (AQIA), pursuant to the California Environmental Quality Act (CEQA), for the A.M. Castle & Co., Inc ("Castle Metals" or "Castle") new Conditional Use Permit (CUP) to formally memorialize existing titanium, aluminum, and steel processing operations and to introduce chemical milling operations at the existing Castle Metals facility (the "Facility") (hereinafter referred to as the "Project"). The Facility occupies a 266,578 square foot ("SF") industrial building within Assessor's Parcel Numbers ("APN") 6236-034-010 and 6236-034-009 totaling 12.1 acres at 14001 Orange Avenue within Paramount, CA.

The proposed Project's construction would include the following criteria pollutant emissions: volatile organic gases (VOC), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and suspended particulate matter (PM₁₀ and PM_{2.5}). Proposed Project operations would generate air pollutant emissions from mobile sources (vehicle activity from operations), energy sources, and stationary sources (permitted and permit-exempt equipment). Project construction and operational activities would also generate greenhouse gas (GHG) emissions. Criteria and GHG emissions were estimated using data from the California Emissions Estimator Model (CalEEMod) version 2022.1 (California Air Pollution Control Officers Association (CAPCOA) 2022a), which is the most current version of the model approved for use by the South Coast Air Quality Management District (South Coast AQMD), EMFAC, manufacturer provided data, and South Coast AQMD approved emission factors for stationary source equipment.

This AQIA has the following findings with respect to air quality and GHG, which address the specific impact statements within the CEQA Guidelines Appendix G Environmental Checklist Form (California Code of Regulations, Title 14):

Air Quality

CEQA Guidelines Appendix G Environmental Checklist – Criteria a): The Project would not conflict with or obstruct implementation of any applicable air quality plan (see Section 6.2.1).

The Project would be required to comply with regional air quality rules promulgated by the South Coast AQMD and participate in reducing air pollutant emissions. Specifically, air quality impacts from proposed projects within City of Paramount are controlled through policies and provisions of the City of Paramount General Plan, South Coast AQMD's Final 2016 Air Quality Management Plan (AQMP), South Coast AQMD's final 2022 AQMP, and Southern California Association of Government's (SCAG's) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (SCAG, 2020). In order to demonstrate that a proposed Project would not cause further air quality degradation in either the South Coast AQMD's plan to improve air quality within the air basin, or the federal requirements to meet certain air quality compliance goals, each project should also demonstrate consistency with the South Coast AQMD's adopted Air Quality Attainment Plans (AQAP) for O₃ and PM₁₀. The South Coast AQMD is required to submit a "Rate of Progress" document to the California Air Resources Board (CARB) that demonstrates past and planned progress toward reaching attainment for all criteria pollutants. The California Clean Air Act (CCAA) requires air pollution control districts with severe or extreme air quality problems to provide for a 5% reduction in non-attainment emissions per year. The AQAP prepared for the South Coast Air Basin by the South Coast AQMD complies with this requirement. CARB reviews, approves or amends the document and forwards the plan to the U.S. Environmental Protection Agency (U.S. EPA) for final review and approval within the State Implementation Plan (SIP).

As the continuance of existing operations represented by the proposed Project, and any future growth that may or may not result, is already included in the City of Paramount General Plan and the AQAP, conclusions may be drawn from the following criteria:

1. That, by definition, the proposed emissions from the Project are below the South Coast AQMD's established emissions impact thresholds;
2. That the primary source of emissions from the Project will be metal processing operations and motor vehicles that are licensed through the State of California and whose emissions are already incorporated into CARB's South Coast Air Basin's Emissions Inventory.

Based on these factors, the proposed Project is consistent with the AQAP. Therefore, the Project would not obstruct implementation of applicable South Coast AQMD air quality plans and therefore be less than significant.

CEQA Guidelines Appendix G Environmental Checklist – Criteria b): The Project would not 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 AAQS (see Section 6.2.2).

Table 6-2 and **Table 6-3** present the daily emissions for each criteria pollutant associated with both the existing operations, as well as the Project emissions, and the associated significance criteria established by South Coast AQMD. As required by CEQA, the level of significance is determined by the net change (or increment) between pre-project environmental conditions (baseline) and post-project (future) environmental conditions. CEQA does not require an analysis of a proposed Project's existing (or historical) operations. Instead, CEQA requires an analysis of how the proposed Project will incrementally change the existing environmental conditions. Nonetheless, for disclosure purposes, both existing as well as future Project emissions have been disclosed within this AQIA. The baseline emissions, as well as the Project operational emissions, are below the South Coast AQMD significance thresholds for all criteria pollutants. Therefore, potential impacts would be less than significant.

If a project will comply with the requirements in a previously approved plan or mitigation program, including but not limited to an air quality attainment or maintenance plan that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located, then the project's incremental contribution to a cumulative effect is not cumulatively considerable (CEQA Guidelines §15064(h)(3)). The impact analysis for a project's potential to exceed or contribute to exceedance of an ambient air quality standard (AAQS) involves modeling emissions to predict the concentration of pollutant(s) at the property line.

As shown in **Table 6-4**, criteria pollutant emission increases associated with the Project do not exceed applicable thresholds. Therefore, Project would not 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 AAQS, and therefore potential impacts would be less than significant.

CEQA Guidelines Appendix G Environmental Checklist – Criteria c): The Project would not expose sensitive receptors to substantial pollutant concentrations (see Section 6.2.3).

The Project's health risk assessment was conducted as described in **Section 5.2.4** and estimates cancer risk and non-cancer chronic and acute hazards from toxic air contaminants (TACs) to nearby worker, resident, and/or sensitive receptor locations. **Table 6-6** presents health risk assessment results for the Project and compares them to applicable thresholds. Health risk is determined based on the change in conditions associated with the implementation of the Project. Nonetheless, as was done for the criteria pollutants as described above, for disclosure purposes both existing as well as future Project health risk affects have been quantified and are disclosed within this AQIA. As demonstrated by the tables, the Project's potential health risk impact was determined to be less than significant.

CEQA Guidelines Appendix G Environmental Checklist – Criteria d): The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (see Section 6.2.4).

Castle Metals' operations are not anticipated to be odor sources. Additionally, Castle Metals has not had a history of adverse odor releases. In addition, South Coast AQMD Rule 402 acts to prevent occurrences of odor nuisances. Therefore, Project impacts related to odor are less than significant.

Greenhouse Gas (GHG)

CEQA Guidelines Appendix G Environmental Checklist – Criteria a): The Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (see Section 6.2.5).

As discussed in **Sections 4.1.2** and **4.2.5**, Castle Metals is not subject to U.S. EPA's GHGRP and California's MRR for GHG reporting and is not anticipated to become subject as a result of the Project.

GHG emissions have been quantified for the Project, primarily for disclosure purposes. **Table 6-5** includes the GHG emissions from the Project. The proposed Project will increase Castle Metals' GHG emissions by approximately 137 MT CO₂e/year, compared to SCAQMD's threshold of 10,000 MT CO₂e/year. Although the Project would generate GHGs from electricity use, natural gas use, and combustion of gasoline/diesel fuels, each of these is regulated near the top of the supply-chain. As such, each citizen of California (including Castle Metals) has and will continue to have no choice but to purchase electricity and fuels produced in a way that is acceptable to the California market. Thus, Project GHG emissions will be consistent with the relevant plan (i.e., AB 32 Scoping Plan). The Project would meet its fair share of the cost to mitigate the cumulative impact of global climate change because Castle Metals is purchasing energy from the California market. Thus, the Project would have a less than significant impact on applicable GHG reduction plans.

Nonetheless, GHG emissions impacts from implementing the Project were calculated at the Project-specific level for operations. Impact analysis for the Project follows the approach certified by South Coast AQMD in the Final Negative Declaration for the Phillips 66 Los Angeles Refinery Carson Plant – Crude Oil Storage Capacity Project on December 12, 2014 (South Coast AQMD, 2014), which takes into account the cumulative nature of the energy industry and recognizes that consumers of electricity and diesel fuel are in effect regulated by higher level emissions restrictions on the producers of these energy sources. Thus, the proposed Project would have a less than significant GHG impact, with no mitigation measures would be required.

CEQA Guidelines Appendix G Environmental Checklist – Criteria b): The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. Potential conflicts with applicable air quality plans have been analyzed and ruled out (see Section 6.2.5).

Project emissions of GHGs are presented in **Table 6-5**. South Coast AQMD guidance on impact analysis and threshold determination for GHGs were used to evaluate significance of Project GHG emissions. The Project would emit GHGs from fuel burned in engines, natural gas burned in boilers, and from electricity consumption. Transportation fuel suppliers and importers are required to report emissions under the Cap-and-Trade which is designed to reduce GHG emissions as needed to achieve emissions reductions described in related planning documents which primarily consists of the Assembly Bill (AB) 32 Scoping Plan. Thus, the emissions reductions will occur at a level in the supply chain above the Project which will have no choice but to use fuels with GHG intensities that are consistent with the current Scoping Plan.

In summary, GHG emissions from the Project are less than the South Coast AQMD GHG screening criteria. In addition, each Project source would emit GHGs in amounts consistent with the AB 32 Scoping Plan. Therefore, the Project's potential impact related to GHG emissions is less than significant.

2. INTRODUCTION

2.1 Purpose

This AQIA was prepared pursuant to the South Coast AQMD CEQA Air Quality Handbook (South Coast AQMD, 1993, Revision: 2022a), other guidance resources posted on its webpage¹, and the California Environmental Quality Act (CEQA) Statute and Guidelines (CEQA 2022). This AQIA addresses City of Paramount (City) scoping direction as the CEQA Lead Agency for this technical report.

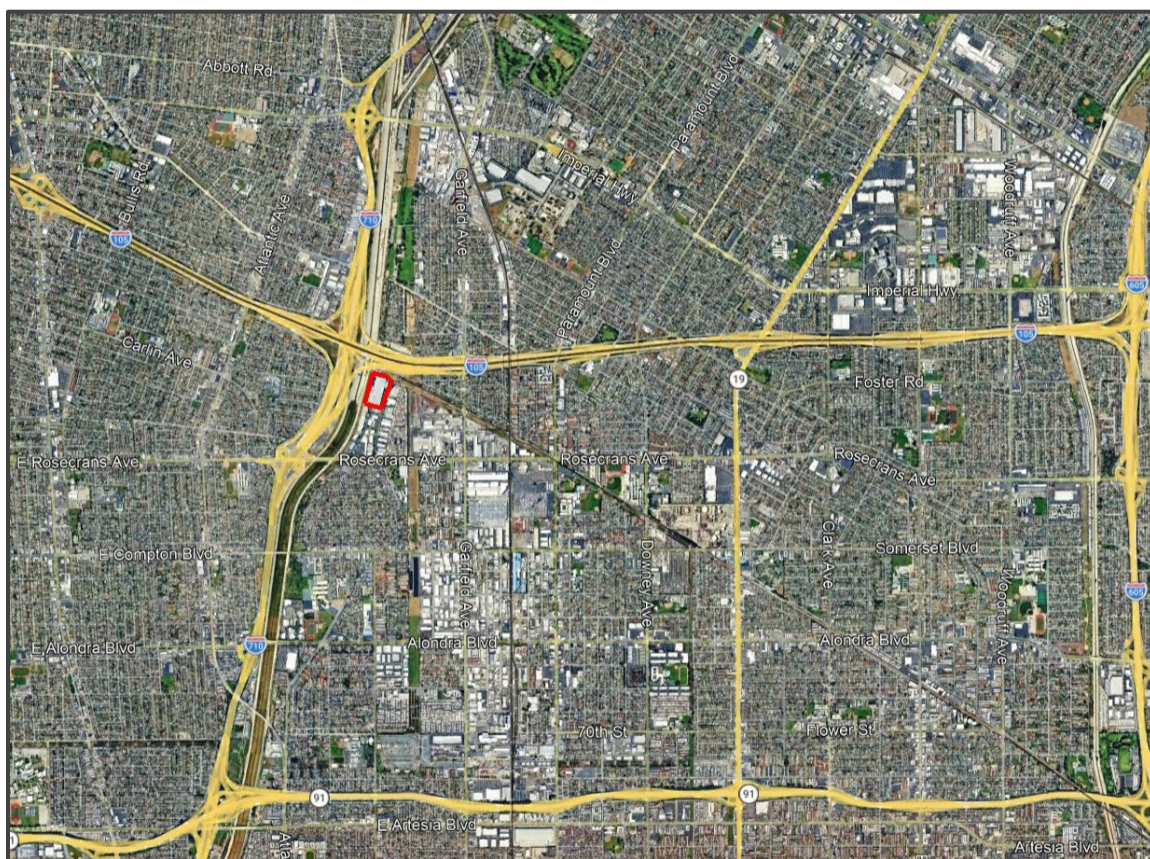
2.2 Operations Description

2.2.1 Existing Operations

The existing operations at Castle Metals include precision cutting of titanium, aluminum, and steel. Incoming metal materials are straightened to the selected thickness, cut using high-precision machinery, polished, then packaged for export.

Figure 2-1 depicts the regional location, and **Figure 2-2** depicts an aerial view of the facility location.

Figure 2-1. Regional Location



¹ South Coast AQMD CEQA guidance documents are located here: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

Figure 2-2. Facility Location



Existing operations currently occurring at Castle Metals are the “baseline” against which the proposed Project’s potential impacts to air quality have been analyzed to determine whether the Project will result in a potentially significant environmental impact under CEQA. CEQA does not require an analysis of a proposed Project’s existing (i.e., baseline or historical) operations. Instead, CEQA requires an analysis of how the proposed Project will incrementally change the existing environmental conditions. Nonetheless, in certain instances, baseline emissions have been quantified within this AQIA for disclosure purposes.

2.2.2 Proposed Project

The proposed operations would add the chemical milling process. The chemical milling process involves submerging the metal material in an acidic etching solution, which reacts with the metal to remove excess material and create the desired shape or pattern. The chemical milling process is vented to a scrubber to control NO_x. This scrubber will be subject to South Coast AQMD Rule 1159.1, *Control of NO_x Emissions from Nitric Acid Tanks*.

3. ENVIRONMENTAL SETTING

Protection of public health is maintained through the attainment and maintenance of ambient air quality standards (AAQS) for various atmospheric compounds and the enforcement of emissions limits for individual stationary sources. The Federal Clean Air Act requires that the U.S. Environmental Protection Agency (U.S. EPA) establish National AAQS (NAAQS) to protect the health, safety, and welfare of the public. NAAQS have been established for ozone (O₃), CO, NO₂, SO₂, PM₁₀ and PM_{2.5}, and lead (Pb). California has also adopted AAQS (CAAQS) for these "criteria" air pollutants. CAAQS are more stringent than the corresponding NAAQS and include standards for hydrogen sulfide (H₂S), vinyl chloride (chloroethene), and visibility reducing particles. The U.S. Clean Air Act Amendments of 1977 required each state to identify areas that were in non-attainment of the NAAQS and to develop State Implementation Plans (SIP's) containing strategies to bring these non-attainment areas into compliance. NAAQS and CAAQS designation/classification for Los Angeles County are presented in **Section 3.4** below.

Responsibility for regulation of air quality in California lies with the California Air Resources Board (CARB) and the 35 local air districts with oversight responsibility held by the U.S. EPA. CARB is responsible for regulating mobile source emissions, establishing CAAQS, conducting research, managing regulation development, and providing oversight and coordination of the activities of the 35 air districts. The air districts are primarily responsible for regulating stationary source emissions and monitoring ambient pollutant concentrations. CARB also determines whether air basins, or portions thereof, are "unclassified," in "attainment" or in "non-attainment" for the NAAQS and CAAQS relying on statewide air quality monitoring data.

3.1 Meteorological Conditions

The South Coast AQMD's jurisdiction consists of a four-county region which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, the Riverside County portion of the Salton Sea Air Basin, and the non-Palo Verde, Riverside County portion of the Mojave Desert Air Basin. The South Coast AQMD region is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. Castle Metals is located within the Los Angeles County portion of the Basin.

The climate in the South Coast Air Basin (Basin) is generally characterized by sparse winter rainfall and hot summers tempered by cool ocean breezes. A temperature inversion, a warm layer of air that traps the cool marine air layer underneath it and prevents vertical mixing, is the prime factor that allows contaminants to accumulate in the Basin. The mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds. The climate of the area is not unique, but the high concentration of mobile and stationary sources in the western portion of the Basin, in addition to the mountains, which surround the perimeter of the Basin, contribute to air quality challenges in the region.

3.2 Temperature and Rainfall

Local winds are the result of temperature differences between the relatively stable ocean air and the uneven heating and cooling that takes place in the Basin due to a wide variation in topography. Temperature also has a major effect on vertical mixing height and affects chemical and photochemical reaction times. The annual average temperature across the Basin is 75°F. The coastal areas show little variation in temperature on a year-round basis due to the moderating effect of the marine influence. On average, August is the warmest month while January is the coolest month. Most of the annual rainfall in the Basin falls between November

and April. Annual average rainfall varies from nine (9) inches in Riverside to fourteen (14) inches in downtown Los Angeles.

Meteorological data for various monitoring stations is maintained by the Western Regional Climate Center. Meteorological data for the Project site is expected to be similar to the data recorded at Long Beach Daugherty Field, which is located south of the Project site. This data is provided in **Table 3-1**. Over the 67-year period from 1949 through 2016 (the most recent data available), the average annual precipitation was 12.01 inches.

Table 3-1. Weather Data for Long Beach Daugherty Field

Period of Record Monthly Climate Summary for the Period 01/01/1949 to 06/09/2016													
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Avg. Maximum Temp (F)	67.1	67.2	68.4	71.7	73.5	76.9	82.2	83.9	82.3	77.9	72.2	67.0	74.2
Avg. Minimum Temp (F)	45.6	47.3	49.7	52.4	56.8	60.3	63.7	64.9	62.9	57.9	50.5	45.3	54.8
Average Total Precipitation (in.)	2.63	2.90	1.83	0.70	0.20	0.06	0.02	0.06	0.19	0.42	1.21	1.8	12.01
Average Snowfall (in.)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Average Snow Depth (in.)	0	0	0	0	0	0	0	0	0	0	0	0	0
Percent of possible observations for period of record: Max. Temp.: 100% Min. Temp.: 100% Precipitation: 100% Snowfall: 90% Snow Depth: 90.4%													
Source: Western Regional Climate Center													

3.3 Wind Flow Patterns

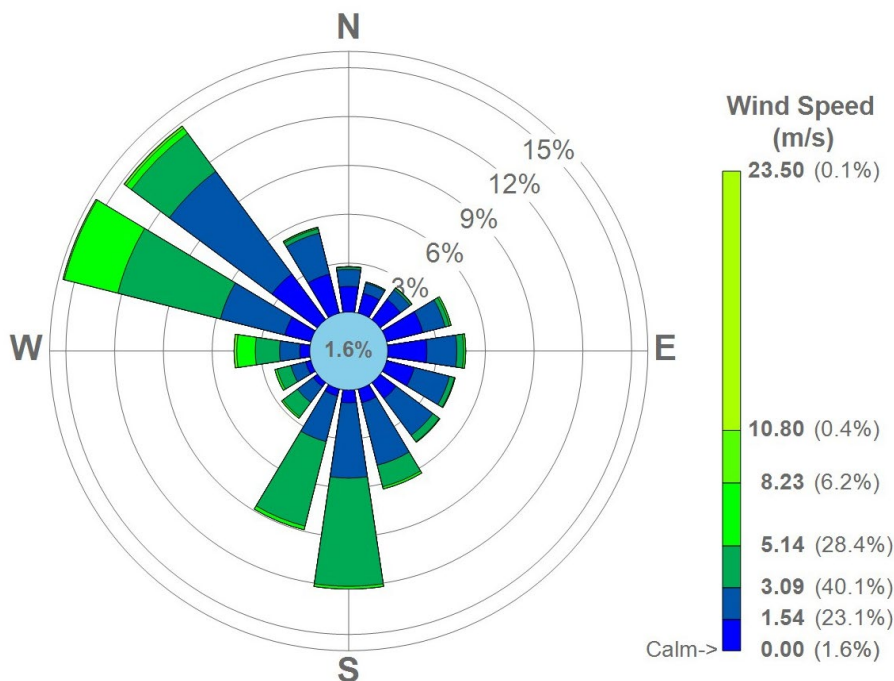
Wind flow patterns play an important role in the transport of air pollutants in the Basin. The winds flow from offshore and blow eastward during the daytime hours. In summer, the sea breeze starts in mid-morning, peaks at 10-15 miles per hour, and subsides after sundown. There is a calm period until about midnight. At that time, the land breeze begins from the northwest, typically becoming calm again about sunrise. In winter, the same general wind flow patterns exist, except that summer wind speeds average slightly higher than winter wind speeds. This pattern of low wind speeds is a major factor that allows the pollutants to accumulate in the Basin. The normal wind patterns in the Basin are interrupted by the unstable air accompanying the passing storms during the winter, and infrequent strong northeasterly Santa Ana wind flows from the mountains and deserts north of the Basin.

Wind speed data collected by South Coast AQMD at the Long Beach Airport station (approximately 6 mile from Castle Metals) for calendar years 2015-2019 is shown in **Table 3-2**. The average monthly wind speed varies throughout the year. The windiest month of the year in Long Beach is April, with an average hourly wind speed of 6.93 miles per hour. The calmest month of the year in Long Beach is January, with an average hourly wind speed of 5.06 miles per hour.

Table 3-2. Long Beach Wind Data

Month	Wind Speeds (mph)	
	Average	Maximum
January	5.06	38.6
February	5.80	52.5
March	6.16	27.5
April	6.93	32.4
May	6.90	20.9
June	6.67	18.6
July	6.76	16.9
August	6.53	17.7
September	6.26	17.9
October	5.61	21.1
November	5.11	30.1
December	5.21	24.0

Figure 3-1. Long Beach Airport Windrose



3.4 Criteria Pollutants

The Project area is located within Los Angeles County in the South Coast Air Basin. The Los Angeles County is included among the four counties that comprise the South Coast AQMD. The South Coast AQMD acts as the regulatory agency for air pollution control in the area and is the local agency empowered to regulate air pollutant emissions for the Project area. **Table 3-3** summarizes the applicable NAAQS and CAAQS.

Table 3-3. Federal & California Air Quality Standards

Pollutant	Averaging Time	NAAQS	CAAQS
		Concentration	
O ₃	8-hour	0.070 ppm (137 µg/m ³) ^a	0.070 ppm (137 µg/m ³)
	1-hour		0.09 ppm (180 µg/m ³)
CO	8-hour	9 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)
	1-hour	35 ppm (40 mg/m ³)	20 ppm (23 mg/m ³)
NO ₂	Annual Arithmetic Mean	53 ppb (100 µg/m ³)	0.030 ppm (57 µg/m ³)
	1-Hour	100 ppb (188 µg/m ³)	0.18 ppm (339 µg/m ³)
SO ₂	3-Hour	0.5 ppm (1,300 µg/m ³)	
	24 Hour	No Federal Standard	0.04 ppm (105 µg/m ³)
	1-Hour	75 ppb (196 µg/m ³)	0.25 ppm (655 µg/m ³)
Particulate Matter (PM ₁₀)	Annual Arithmetic Mean		20 µg/m ³
	24-Hour	150 µg/m ³	50 µg/m ³
Fine Particulate Matter (PM _{2.5})	Annual Arithmetic Mean	9 µg/m ³	12 µg/m ³
	24-Hour	35 µg/m ³	
Sulfates	24-Hour		25 µg/m ³
Pb ^d	Rolling Three-Month Average	0.15 µg/m ³	
	Calendar Quarter	1.5 µg/m ³	
	30 Day Average		1.5 µg/m ³
H ₂ S	1-Hour		0.03 ppm (42 µg/m ³)
Vinyl Chloride (chloroethene)	24-Hour		0.010 ppm (26 µg/m ³)
Visibility Reducing particles	8 Hour (1000 to 1800 PST)		b
ppm = parts per million ppb = parts per billion		mg/m ³ = milligrams per cubic meter	µg/m ³ = micrograms per cubic meter
Source: CARB 2024 a. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm b. Extinction coefficient of 0.23 per kilometer - visibility of ten miles or more due to particles when relative humidity is less than 70 %.			

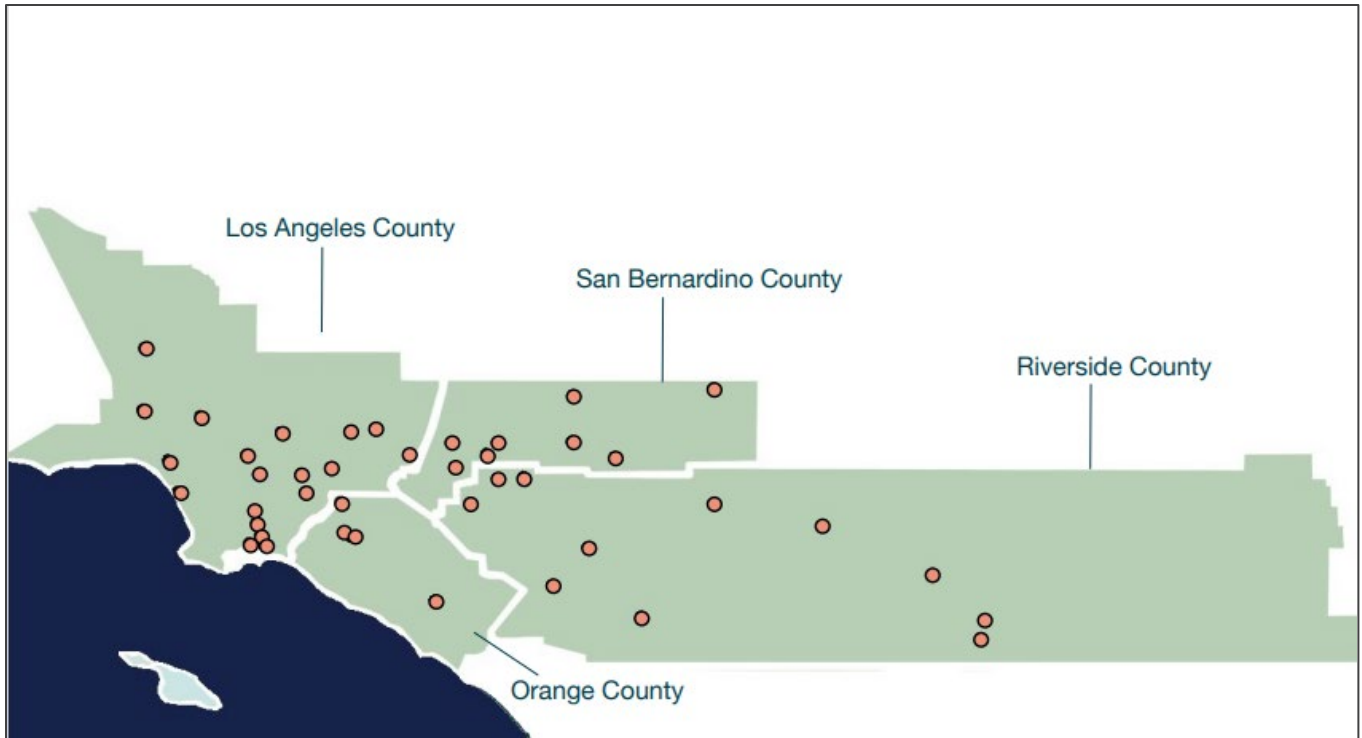
Under the provisions of the U.S. Clean Air Act, the Los Angeles County of the South Coast AQMD has been classified as nonattainment (extreme, moderate, serious), nonattainment, attainment, maintenance, partial nonattainment, unclassified or no federal standard under the established NAAQS and CAAQS for various criteria pollutants. **Table 3-4** provides the South Coast AQMD's designation and classification based on the various criteria pollutants under both NAAQS and CAAQS.

Table 3-4. Air Basin NAAQS and CAAQS Attainment Status

NAAQS^a	
8-Hour Ozone (2015)	Extreme - Nonattainment
8-Hour Ozone (2008)	Extreme - Nonattainment
8-Hour Ozone (1997)	Extreme - Nonattainment
1-Hour Ozone (1979)	Extreme - Nonattainment
PM _{2.5} (2012)	Serious - Nonattainment
PM _{2.5} (2006)	Serious - Nonattainment
PM _{2.5} (1997)	Moderate - Nonattainment
PM ₁₀ (1987)	Serious - Maintenance
SO ₂ (2010)	Attainment
SO ₂ (1971)	Attainment
Lead (2008)	Nonattainment
Lead (1978)	Attainment
CO (1971)	Serious - Maintenance
NO ₂ (1971)	Maintenance
CAAQS^b	
Ozone	Nonattainment
PM _{2.5}	Nonattainment
PM ₁₀	Nonattainment
CO	Attainment
NO ₂	Partial Nonattainment (CA 60 Near-road Portion of San Bernardino, Riverside and Los Angeles Counties)
SO ₂	Attainment
Sulfates	Attainment
H ₂ S	Unclassified
Lead ^c	Attainment
Source:	
a. U.S. EPA, 2020	
b. CARB, 2019b	
c. Only Los Angeles County portion of SCAB is in nonattainment for lead.	

The South Coast AQMD, along with CARB, operates an air quality monitoring network that provides information on average concentrations of those pollutants for which Federal or State agencies have established NAAQS and CAAQS, respectively. The monitoring stations in the South Los Angeles County Coastal are depicted in **Figure 3-2**.

Figure 3-2. South Coast AQMD Monitoring Network



3.5 Regional Air Quality

Air quality in the Basin is monitored by the South Coast AQMD, which operates a network of 38 permanent air monitoring stations and four (4) single-pollutant source impact lead air monitoring sites throughout the South Coast AQMD jurisdiction (South Coast AQMD 2020). For the purposes of background data and this air quality analysis, this analysis relied on data collected in the last three years for the CARB monitoring stations that are located in the closest proximity to the project site. **Table 3-5** provides the background concentrations for O₃, particulate matter of 10 microns (PM₁₀), particulate matter of less than 2.5 microns (PM_{2.5}), CO, NO₂, SO₂, and Pb. Information is provided for local monitoring stations for 2022 through 2024 air quality data (the latest data available) from South Coast AQMD's monitoring stations is presented in **Table 3-5** below.

Table 3-5. Existing Ambient Air Quality Monitoring in Project Area

Pollutant and Monitoring Station Location	Maximum Concentration			Days Exceeding Standard		
	2022	2023	2024	2022	2023	2024
O₃ – 1-hour CAAQS (0.09 ppm)						
Long Beach – Signal Hill	0.108	0.089	0.103	1	0	1
Compton – 700 North Bullis Road	0.111	0.084	0.087	1	0	0
O₃ – 8-hour CAAQS (0.07 ppm)						
Long Beach – Signal Hill	0.077	0.065	0.071	1	0	1
Compton – 700 North Bullis Road	0.085	0.071	0.064	1	2	0
O₃ – 8-hour NAAQS (0.070 ppm)						
Long Beach – Signal Hill	0.077	0.065	0.071	1	0	1
Compton – 700 North Bullis Road	0.085	0.071	0.064	1	1	0
PM₁₀ – 24-hour CAAQS (50 µg/m³)						
Long Beach – Signal Hill	*	*	*	*	*	*
Long Beach – 2425 Webster Street	*	*	*	*	*	*
PM₁₀ – 24-hour NAAQS (150 µg/m³)						
Long Beach – Signal Hill	57.9	81.2	83.0	0	0	0
Long Beach – 2425 Webster Street	128.6	148.6	115.8	0	0	0
PM_{2.5} - 24-hour NAAQS (35 µg/m³)						
Long Beach – Signal Hill	26.7	31.0	43.8	0	0	1
Compton – 700 North Bullis Road	52.8	54.6	57.4	6	2	7
Long Beach – Route 710 Near Road	39.0	58.3	44.2	1	1	2
CO - 8-Hour CAAQS & NAAQS (9.0 ppm)						
No data collected	--	--	--	--	--	--
NO₂ - 1-Hour CAAQS (0.18 ppm)						
Long Beach – Signal Hill	0.058	0.056	0.055	0	0	0
Compton – 700 North Bullis Road	0.064	0.053	0.060	0	0	0
Long Beach – Route 710 Near Road	0.095	0.071	0.075	0	0	0
NO₂ - 1-Hour NAAQS (0.10 ppm)						
Long Beach – Signal Hill	0.058	0.056	0.055	0	0	0
Compton – 700 North Bullis Road	0.065	0.053	0.061	0	0	0
Long Beach – Route 710 Near Road	0.095	0.071	0.076	0	0	0
SO₂ – 24-hour Concentration - CAAQS (0.04 ppm) & NAAQS (0.14 ppm)						
No data collected	--	--	--	--	--	--
Pb - Maximum 30-Day Concentration CAAQS (1500 ng/m³)						
Los Angeles – North Main Street	11.2	10.5	9.8	*	*	*
Source: CARB 2022a Notes: ppm= parts per million * There was insufficient (or no) data available to determine the value.						

The following is a description of criteria air pollutants, typical sources and health effects and the recently documented pollutant levels in the Project vicinity.

3.5.1 Ozone (O₃)

The most severe air quality problem in Los Angeles County is high concentrations of O₃. O₃ is not emitted directly into the atmosphere but is a secondary pollutant produced through photochemical reactions involving hydrocarbons and nitrogen oxides (NO_x). Significant O₃ generation requires about one to three hours in a stable atmosphere with strong sunlight. For this reason, the months of April through October comprise the "ozone season." O₃ is a regional pollutant because O₃ precursors are transported and diffused by wind

concurrently with the reaction process. The data contained in **Table 3-5** shows that the monitoring area exceeded the 1-hour average ambient O₃ CAAQS and the 8-hour average ambient O₃ NAAQS and CAAQS during the data period.

3.5.1.1 Ozone Health Impacts

High levels of O₃ cause eye irritation and can impair respiratory functions. O₃ can cause chest pain, coughing, shortness of breath, and throat irritation; it can also worsen chronic respiratory diseases such as asthma and compromise the ability of the body to fight respiratory infections. High levels of O₃ can also affect plants and materials. Grapes, lettuce, spinach and many types of garden flowers and shrubs are particularly vulnerable to O₃ damage.

3.5.2 Suspended Particulate Matter (PM₁₀ and PM_{2.5})

Both State and Federal particulate standards now apply to particulates under 10 microns (PM₁₀) rather than to total suspended particulate (TSP), which includes particulates up to 30 microns in diameter. Continuing studies have shown that the smaller-diameter fraction of TSP represents the greatest health hazard posed by the pollutant; therefore, U.S. EPA has recently established NAAQS for PM_{2.5}. The Project area is classified as nonattainment for both PM₁₀ and particulates under 2.5 microns (PM_{2.5}) for CAAQS.

Particulate matter consists of particles in the atmosphere resulting from many kinds of dust and fume-producing industrial and agricultural operations, from combustion, and from atmospheric photochemical reactions. Natural activities also increase the level of particulates in the atmosphere; wind-raised dust and ocean spray are two sources of naturally occurring particulates. The largest sources of PM₁₀ and PM_{2.5} in Los Angeles County are vehicle movement over paved and unpaved roads, demolition and construction activities, and unplanned fires. PM₁₀ and PM_{2.5} are considered regional pollutants with elevated levels typically occurring over a wide geographic area. Concentrations tend to be highest in the winter, during periods of high atmospheric stability and low wind speed.

PM₁₀ data for comparison against the CAAQS was not available at all the monitoring stations during the data period. **Table 3-5** shows that the NAAQS was not exceeded at the monitoring stations during the data period. On the other hand, as indicated in **Table 3-5**, the PM_{2.5} NAAQS was exceeded at the monitoring stations during the data period. Similar levels can be expected to occur in the vicinity of the Project site.

3.5.2.1 Suspended Particulate Matter Health Impacts

In the respiratory tract, very small particles of certain substances may produce injury by themselves or may contain absorbed gases that are injurious. Particulates of aerosol size suspended in the air can both scatter and absorb sunlight, producing haze and reducing visibility. They can also cause a wide range of damage to materials.

3.5.3 Carbon Monoxide (CO)

Ambient CO concentrations normally correspond closely to the spatial and temporal distributions of vehicular traffic. Relatively high concentrations of CO would be expected along heavily traveled roads and near busy intersections. Wind speed and atmospheric mixing also influence CO concentrations; however, under inversion conditions, CO concentrations may be more uniformly distributed over a broad area.

Internal combustion engines, principally in vehicles, produce CO due to incomplete fuel combustion. Various industrial processes also produce CO emissions through incomplete combustion. Gasoline-powered motor vehicles are typically the major source of this contaminant.

None of the CARB monitoring stations reported CO data, as shown in **Table 3-5**.

3.5.3.1 Carbon Monoxide Health Impacts

CO does not irritate the respiratory tract but passes through the lungs directly into the blood stream, and by interfering with the transfer of fresh oxygen to the blood, deprives sensitive tissues of oxygen, thereby aggravating cardiovascular disease, causing fatigue, headaches, and dizziness. CO is not known to have adverse effects on vegetation, visibility, or materials.

3.5.4 Nitrogen Dioxide (NO₂) and Hydrocarbons

Los Angeles County has been designated as an attainment area for the NAAQS for NO₂. NO₂ is the "whiskey brown" colored gas readily visible during periods of heavy air pollution. Mobile sources and oil and gas production account for nearly all of the County's NO_x emissions, most of which is emitted as NO₂. Combustion in motor vehicle engines, power plants, refineries and other industrial operations are the primary sources in the region. Railroads and aircraft are other potentially significant sources of combustion air contaminants. Oxides of nitrogen are direct participants in photochemical smog reactions. The emitted compound, nitric oxide, combines with oxygen in the atmosphere in the presence of hydrocarbons and sunlight to form NO₂ and O₃. NO₂, the most significant of these pollutants, can color the atmosphere at concentrations as low as 0.5 ppm on days of 10-mile visibility. NO_x is an important air pollutant in the region because it is a primary receptor of ultraviolet light, which initiates the reactions producing photochemical smog. It also reacts in the air to form nitrate particulates.

Motor vehicles are the major source of reactive hydrocarbons in the basin. Other sources include evaporation of organic solvents and petroleum production and refining operations. Certain hydrocarbons can damage plants by inhibiting growth and by causing flowers and leaves to fall. Levels of hydrocarbons currently measured in urban areas are not known to cause adverse effects in humans. However, certain members of this contaminant group are important components in the reactions, which produce photochemical oxidants.

Table 3-5 shows that the Federal and State NO₂ standards have not been exceeded at South Los Angeles County monitoring stations during the data period. Please note that the hydrocarbons were not monitored.

3.5.4.1 Nitrogen Dioxide and Hydrocarbons Health Impacts

Certain hydrocarbons can damage plants by inhibiting growth and by causing flowers and leaves to fall. Levels of hydrocarbons currently measured in urban areas are not known to cause adverse effects in humans. However, certain members of this contaminant group are important components in the reactions, which produce photochemical oxidants.

3.5.5 Sulfur Dioxide (SO₂)

Los Angeles County has been designated as an attainment area for the NAAQS for SO₂. SO₂ is the primary combustion product of sulfur, or sulfur containing fuels. Fuel combustion is the major source of this pollutant, while chemical plants, sulfur recovery plants, and metal processing facilities are minor contributors. Gaseous fuels (natural gas, propane, etc.) typically have lower percentages of sulfur containing compounds than liquid fuels such as diesel or crude oil. SO₂ levels are generally higher in the winter months. Decreasing levels of SO₂ in the atmosphere reflect the use of natural gas in power plants and boilers.

Table 3-5 shows no data has been reported during the data period in any monitoring stations.

3.5.5.1 Sulfur Dioxide Health Impacts

At high concentrations, SO₂ irritates the upper respiratory tract. At lower concentrations, when respired in combination with particulates, SO₂ can result in greater harm by injuring lung tissues. Sulfur oxides (SO_x), in combination with moisture and oxygen, results in the formation of sulfuric acid, which can yellow the leaves of plants, dissolve marble, and oxidize iron and steel. SO_x can also react to produce sulfates that reduce visibility and sunlight.

3.5.6 Lead (Pb) and Suspended Sulfate

Ambient Pb levels have dropped dramatically due to the increase in the percentage of motor vehicles that run exclusively on unleaded fuel. Ambient Pb levels in Los Angeles County are well below the ambient standard and are expected to continue to decline; the data reported in **Table 3-5** only shows the highest concentration as the number of days exceeding standards are not reported. Suspended sulfate levels have stabilized to the point where no excesses of the State standard are expected in any given year.

3.5.6.1 Lead and Suspended Sulfate Health Impacts

Pb affects most organs in the body, and children are most susceptible to the effects of Pb. In children, Pb can cause behavior and learning problems, slowed growth, anemia, and hearing problems. In adults, Pb can lead to decreased kidney function, reproductive problems, and cardiovascular effects, such as increased blood pressure and incidence of hypertension. Suspended sulfates are part of PM_{2.5} and therefore have similar health effects. These health effects include reduced lung function, aggravated asthmatic symptoms, and increased risk of emergency department visits, hospitalizations, and death in people who have chronic heart or lung disease.

3.6 Toxic Air Contaminants

Health and Safety Code (HSC) Section 39655 defines a TAC as an air pollutant which may cause or contribute to an increase in mortality, an increase in serious illness, or which may pose a present or potential hazard to human health. U.S. EPA defines hazardous air pollutants (HAPs) as those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. Under California's TAC programs (AB 1807, HSC Section 39650 et seq. and AB 2588, HSC Section 39650 et seq.), CARB, with the participation of the local air pollution control districts, evaluates and develops any needed control measures for air toxics to limit exposure to TACs to the maximum extent feasible.

Office of Environmental Health Hazard Assessment (OEHHA) has determined that long-term exposure to diesel particulate matter (DPM) poses the highest cancer risk of any TAC it has evaluated. Short-term exposure to diesel exhaust can also have immediate health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches, lightheadedness, and nausea. In studies with human volunteers, DPM made people with allergies more susceptible to the materials to which they are allergic, such as dust and pollen. Short-term exposure to diesel exhaust also causes inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the frequency or intensity of asthma attacks.

The City of Paramount and Castle Metals are located closest to the North Long Beach and North Los Angeles monitoring stations. **Table 3-6** presents a summary of the most current available TAC data from the North Long Beach station (ARB# 70072), located at 3648 N. Long Beach Blvd., Long Beach, CA 90807 (approximately 4.5 miles northwest of the facility), and the Los Angeles – North Main Street station (ARB# 70087), located at 1630 North Main St., Los Angeles, CA 90012 (approximately 23 miles northwest of the facility). These

monitoring stations are the closest to the CUP Sites that report all the applicable TACs and show the best available representative pollutant concentrations.

Table 3-6. Ambient Air Quality TACs – Most Recent Maximum Concentration

Pollutant	Peak 24-hour Concentration			
	Long Beach	Year	Los Angeles	Year
VOCs	ppbv		ppbv	
Acetaldehyde	1.8	2013	1.8	2025
Acetone	8.3	2013	6.8	2021
Acetonitrile	0.8	2013	0.15	2021
Acrolein	1.1	2013	0.15	2021
Benzene	0.82	2013	0.59	2022
1,3-Butadiene	0.29	2013	0.12	2022
Carbon Disulfide	0.05	2006	2.9	2006
Carbon Tetrachloride	0.09	2013	0.07	2022
Chlorobenzene	0.05	1994	0.1	1994
Chloroform	0.05	2013	0.05	2022
meta-Dichlorobenzene	0.1	1994	0.1	1994
ortho-Dichlorobenzene	0.15	2007	0.15	2007
para-Dichlorobenzene	0.15	2007	0.15	2007
Dichlorodifluoromethane	--	--	--	--
cis-1,3-Dichloropropene	0.05	2013	0.05	2022
trans-1,3-Dichloropropene	0.05	2013	0.05	2022
Ethyl Benzene	0.3	2013	0.2	2022
Ethylene Dibromide	0.005	1994	0.005	1994
Ethylene Dichloride	0.1	1992	0.1	1992
Formaldehyde	3.8	2013	4.1	2025
Methyl Bromide	0.05	2013	0.015	2022
Methyl Chloroform	0.005	2013	0.005	2022
Methyl Ethyl Ketone	0.3	2013	0.4	2025
Methyl tertiary-Butyl Ether	0.15	2004	0.15	2004
Methylene Chloride	2.6	2013	2.2	2022
Perchloroethylene	0.06	2013	0.02	2022
Styrene	0.1	2013	0.05	2022
Toluene	1.7	2013	1.2	2022
Trichloroethylene	0.08	2013	0.04	2022
Trichlorofluoromethane	--	--	--	--
Trichlorotrifluoroethane	--	--	0.07	2022
meta-Xylene	2.2	1994	6.7	1994
meta/para-Xylene	1.1	2013	0.8	2022
ortho-Xylene	0.4	2013	0.3	2022
para-Xylene	0.9	1994	2.4	1994
CFC-11	--	--	0.2	2022
CFC-12	--	--	0.5	2022
CFC-14	0.1	2013	0.1	2022
HCFC-22	0.8	2013	0.6	2022
HFC- 125	0.4	2013	1.9	2022
HFC-134a	0.5	2013	0.8	2022
HFC-152a	0.7	2013	1.1	2022
Butyraldehyde	--	--	0.05	2025

	Peak 24-hour Concentration			
Propionaldehyde	--	--	0.1	2025
Hexanaldehyde	--	--	0.05	2025
Polycyclic Aromatic Hydrocarbons	ng/m ³	Year	ng/m ³	Year
Benzo(a)pyrene-10	0.61	2004	0.40	2004
Benzo(b)fluoranthene-10	0.51	2004	0.41	2004
Benzo(g,h,i)perylene-10	1.7	2004	1.1	2004
Benzo(k)fluoranthene-10	0.19	2004	0.15	2004
Dibenz(a,h)anthracene-10	0.18	2004	0.025	2004
Indeno(1,2,3-cd)pyrene-10	0.64	2004	0.46	2004
Metals	ng/m ³	Year	ng/m ³	Year
Aluminum	1700	2003	2400	2003
Antimony	12	2013	12	2025
Arsenic	0.75	2013	0.87	2025
Barium	56	2003	95	2003
Beryllium	0.3	2013	0.152	2025
Bromine	9	2003	9	2003
Cadmium	0.75	2013	0.65	2025
Calcium	2300	2003	2800	2003
Chlorine	3900	1990	4200	1990
Chromium	9	2013	19	2025
Cobalt	0.75	2013	0.65	2025
Copper	46	2013	81.9	2025
Hexavalent Chromium	0.07	2013	0.22	2025
Iron	1400	2013	1890	2025
Lead	9.1	2013	7.3	2025
Manganese	30	2013	39.3	2025
Mercury	1.5	2003	4	2003
Molybdenum	5.4	2013	7.1	2025
Nickel	5	2013	6	2025
Phosphorus	35	2003	32	2003
Potassium	890	2003	1000	2003
Platinum	0.15	2013	0.105	2014
Rubidium	4	2003	5	2003
Selenium	0.75	2013	1.65	2025
Silicon	5600	2003	7500	2003
Strontium	14	2013	44.8	2025
Sulfur	2300	2013	1600	2013
Tin	5.4	2013	9.1	2025
Titanium	87	2013	94	2025
Uranium	1.5	2003	1.5	2003
Vanadium	12	2013	3	2025
Yttrium	2	2003	3	2003
Zinc	90	2013	101	2025
Zirconium	4.3	2013	7.1	2025
1. There are no air quality standards for TACs.				
Source: CARB, 2013. Annual Toxics Summaries by Monitoring Site, North Long Beach.				
Notes: ppbv = parts per billion by volume. ng/m ³ = nanograms per cubic meter. -- = no data available in the last 6 years.				

The selection of these monitoring stations was based on the proximity of the monitoring station to the proposed Project location, land-use of the area, and representativeness and availability of the data.

3.6.1 MATES IV and V

The Multiple Air Toxics Exposure Study (MATES) IV and MATES V report the monitored and modeled concentrations of air toxics and estimated the carcinogenic risks from ambient levels of air toxics. Chronic non-cancer health impacts were also estimated from the monitoring data, and MATES V includes an exploratory analysis of chronic non-cancer health impacts (e.g., cardiovascular, respiratory, neurological health outcomes, etc.). The chronic non-cancer health impacts, typically expressed as a hazard index, is an indicator of whether non-cancer health effects can occur due to long-term exposure to TACs. A hazard index that is less than or equal to one indicates that chronic non-cancer health effects are not likely to occur over a lifetime of exposure. Annual average concentrations were used to estimate a lifetime risk from exposure to these levels, consistent with guidelines established by the OEHHA of the California Environmental Protection Agency (CalEPA). Given the generally decreasing air pollution levels in the region, ambient concentrations of some pollutants can sometimes be lower than what air quality monitoring instruments can detect. Therefore, statistical techniques are required to calculate average concentrations and provide an estimate of actual levels. Modern statistical techniques were used to analyze the MATES V data and to provide the MATES V study's comprehensive comparison of pollutant trends. MATES II, MATES III, and MATES IV measurements were also re-analyzed as part of MATES V using these same techniques.

In addition to new measurements and updated modeling results, several other key updates were implemented in MATES V. First, MATES V estimates cancer risks by taking into account multiple exposure pathways, including both inhalation and non-inhalation pathways, which includes soil exposure. Exposure from non-inhalation pathways results from substances that deposit on the ground in particulate form and contribute to risk through the ingestion of soil or homegrown crops, or through dermal absorption. Utilizing this multiple exposure pathways approach is consistent with how cancer risks are estimated under South Coast AQMD's programs such as permitting, Air Toxics Hot Spots (AB2588), and CEQA compliance. Second, along with cancer risk estimates, MATES V also includes information on the chronic non-cancer health impacts from inhalation and non-inhalation pathways.

Air toxics monitoring data collected at 10 fixed site monitoring locations shows that the levels of air toxics in the Basin continue to decline, including the Compton site (located less than two miles away from Castle). **Figure 3-3** and **Figure 3-4** illustrate the following key findings from MATES V, which include:

- ▶ MATES V found a 40% decrease in risk since MATES IV and an 84% decrease since MATES II. The estimated population wide population-weighted cancer risk calculated from the modeling data (as opposed to fixed site monitoring data) similarly found a 54% decrease since MATES IV.
- ▶ MATES V determined that diesel PM is the largest contributor to overall air toxics cancer risk. However, monitoring data showed that the average levels of diesel PM in MATES V are 53% lower at the 10 fixed site monitoring locations as compared to MATES IV and 86% lower as compared to MATES II.
- ▶ The main sources of cancer risk in the Basin are neither lead nor arsenic, as shown in **Figure 3-3**. Most monitoring sites indicated that concentrations of lead and arsenic also continued an overall downward trend in MATES V as compared to MATES IV.

Figure 3-3. Average MATES V Cancer Risk

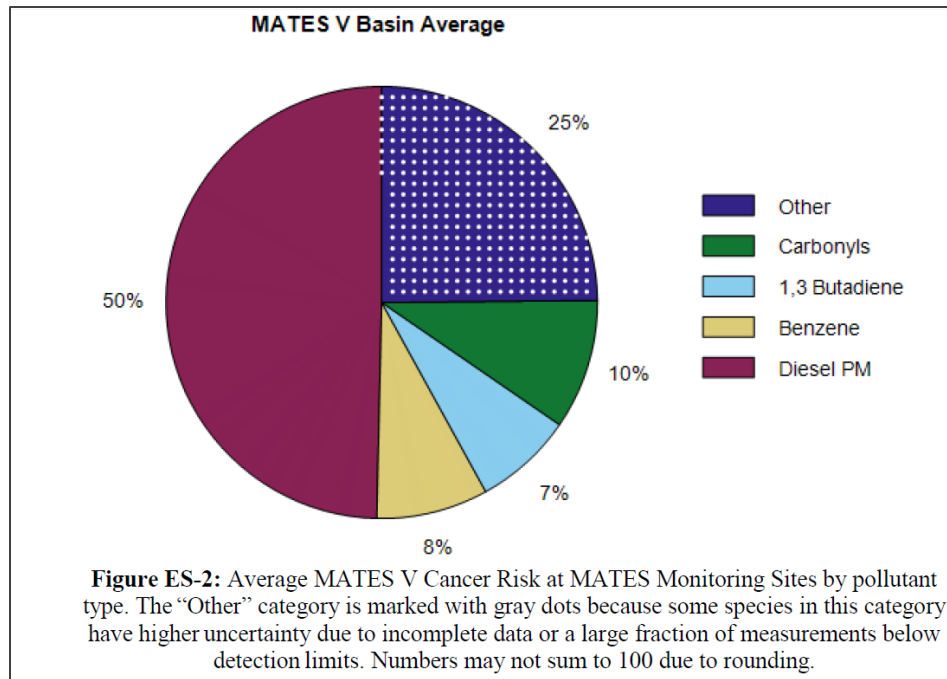
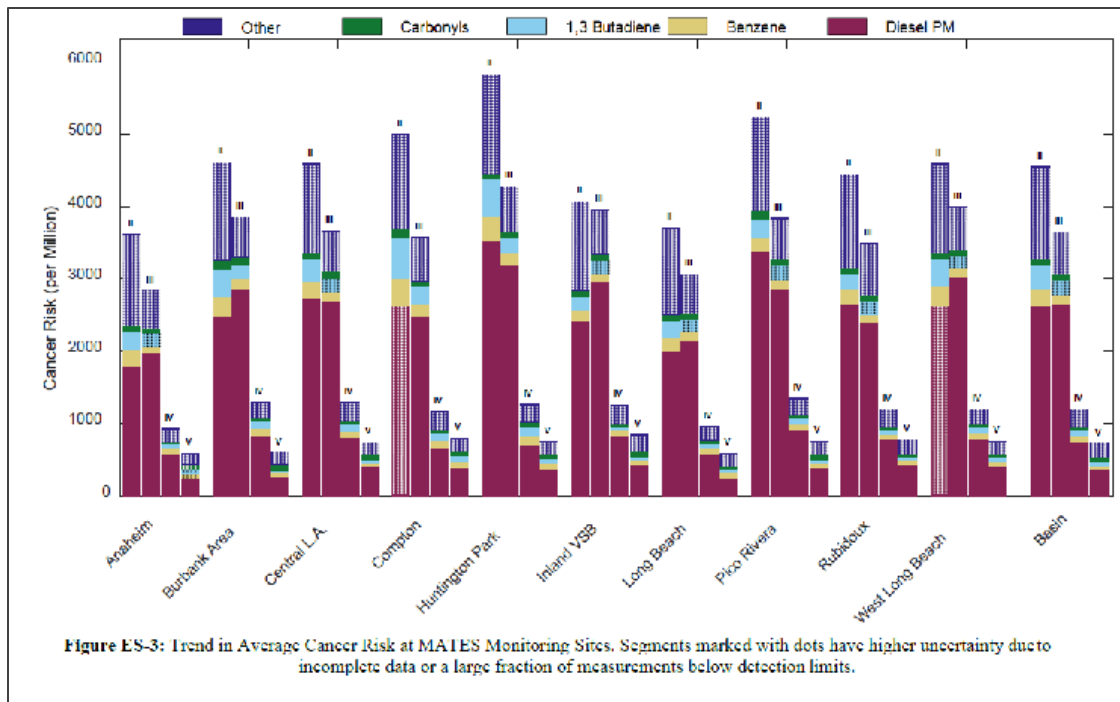


Figure 3-4. Trend in Average Cancer Risk by Monitoring Station



3.7 Greenhouse Gases

GHGs are a set of compounds whose presence in the atmosphere is associated with the differential absorption of incoming solar radiation and outgoing radiation from the surface of the earth. GHGs, such as carbon dioxide,

methane, nitrous oxide, and certain synthetic chemicals, trap some of the Earth's outgoing energy, thus retaining heat in the atmosphere. This heat trapping causes changes in the radiative balance of the Earth - the balance between energy received from the sun and emitted from Earth - that alter climate and weather patterns at global and regional scales (U.S. EPA, 2020c). More specifically, GHGs strongly absorb the long-wave radiation emitted by the earth and hence are capable of warming the atmosphere. Regulated GHGs in California are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and nitrogen trifluoride (NF₃). Other GHGs, such as water vapor, are not regulated.

In order to attempt to quantify the impact of specific GHGs, each gas is assigned a global warming potential (GWP). Individual GHG compounds have varying GWPs and atmospheric lifetimes. The GWP of a GHG is a measure of how much a given mass of a GHG is estimated to contribute to global warming, relative to CO₂, which is assigned a GWP of 1.0.

The GWP is used to determine the carbon dioxide equivalent (CO₂e) mass of each GHG. The calculation of the CO₂e is the accepted methodology for comparing GHG emissions since it normalizes various GHG emissions to a consistent reference gas, CO₂. For example, CH₄'s GWP of 25 indicates that the global warming effect of CH₄ is 25 times greater than that of CO₂ on a unit mass basis. CO₂e is the mass emissions of an individual GHG multiplied by its GWP.

The physical properties and sources of GHGs are described in **Table 3-7**.

Table 3-7. GWPs, Properties, and Sources of GHGs

Constituent	GWP	Description and Physical Properties	Sources
CO ₂	1	CO ₂ is an odorless, colorless, naturally occurring GHG.	CO ₂ is emitted from natural and anthropogenic (human) sources. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic out gassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood.
CH ₄	25	CH ₄ is an organic, colorless, naturally occurring, flammable gas. Its atmospheric concentration is less than CO ₂ and its lifetime in the atmosphere is brief (10-12 years) compared to other GHGs.	CH ₄ has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of CH ₄ . Other anthropogenic sources include fossil-fuel and biomass combustion, as well as landfilling and wastewater treatment.

Constituent	GWP	Description and Physical Properties	Sources
N ₂ O	298	N ₂ O, commonly referred to as "laughing gas," is a colorless, nonflammable GHG. It is a powerful oxidizer and breaks down readily in the atmosphere.	Nitrous oxide is produced by microbial processes in soil and water, including those reactions that occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant, e.g., in whipped cream bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars.
HFCs	92 - 14,900	HFCs are synthetic man-made chemicals that form one of the GHGs with the highest GWP	HFCs are man-made for applications such as automobile air conditioners and refrigerants.
PFCs	6,288 - 17,700	PFCs are colorless, non-flammable, dense gasses that have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years.	The two main sources of PFCs are primary aluminum production and semiconductor manufacture.
SF ₆	22,800	SF ₆ is an inorganic, odorless, colorless, nontoxic, nonflammable gas.	SF ₆ is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.
NF ₃	17,200	NF ₃ is an inorganic, colorless, odorless, nonflammable gas.	NF ₃ is used primarily in the plasma etching of silicon wafers
Source: CARB 2026b			

There is growing concern about GHG emissions and their adverse impacts on the world's climate and environment. These concerns relate to the change in the average weather of the earth that may be measured by changes in wind patterns, storms, precipitation, and temperature.

Throughout history, climate has been changing due to forces unrelated to human activity, including solar energy input variation, volcanic activity, and changing concentrations of key atmospheric constituents such as CH₄ and CO₂. These climate changes resulted in ice ages and warm interglacial periods, accompanied by large differences in snow and ice cover and associated changes in ecological systems.

Large-scale combustion of fossil fuels (i.e., coal, oil, and natural gas) by humans beginning in the 19th century resulted in significant increases in emissions of CO₂. The resulting increase in atmospheric levels of CO₂ has been recorded in long-term records at monitoring stations such as Mauna Loa, Hawaii, where measured background ambient CO₂ levels have increased from 285 parts per million (ppm) in 1877 (Stanhill, 1984) to the current level of 410 ppm (NOAA, 2018). Simultaneously, average surface temperatures have been

increasing at many locations around the world. Multiple lines of evidence confirm that human activities are the primary cause of the global warming of the past 50 years. Natural factors, such as variations in the sun's output, volcanic activity, the Earth's orbit, the carbon cycle, and others, also affect Earth's radiative balance. However, beginning in the late 1700s, the net global effect of human activities has been a continual increase in GHG concentrations (IPCC, 2013; U.S. Global Change Research Program, 2014).

3.7.1 Global Climate Change

"Global climate change" refers to change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms, lasting for decades or longer. The term "global climate change" is often used interchangeably with the term "global warming," but "global climate change" is preferred by some scientists and policy makers to "global warming" because it helps convey the notion that in addition to rising temperatures, other changes in global climate may occur. Climate change may result from the following influences:

- ▶ Natural factors, such as changes in the sun's intensity or slow changes in the Earth's orbit around the sun;
- ▶ Natural processes within the climate system (e.g., changes in ocean circulation); and/or
- ▶ Human activities that change the atmosphere's composition (e.g., through burning fossil fuels) and the land surface (e.g., deforestation, reforestation, urbanization, and desertification).

As determined from worldwide meteorological measurements between 1990 and 2005, the primary observed effect of global climate change has been a rise in the average global tropospheric temperature of 0.36 degree Fahrenheit (°F) per decade. Climate change modeling shows that further warming could occur, which could induce additional changes in the global climate system during the current century. Changes to the global climate system, ecosystems, and the environment of California could include higher sea levels, drier or wetter weather, changes in ocean salinity, changes in wind patterns or more energetic aspects of extreme weather (e.g., droughts, heavy precipitation, heat waves, extreme cold, and increased intensity of tropical cyclones). Specific effects from climate change in California may include a decline in the Sierra Nevada snowpack, erosion of California's coastline, and seawater intrusion in the Sacramento-San Joaquin River Delta.

Human activities, including fossil fuel combustion and land use changes, release carbon dioxide (CO₂) and other compounds cumulatively termed GHGs. GHGs are effective at trapping radiation that would otherwise escape the atmosphere. This trapped radiation warms the atmosphere, the oceans, and the earth's surface (USGCRP, 2014). Many scientists believe "most of the warming observed over the last 50 years is attributable to human activities" (IPCC, 2017). The increased amount of CO₂ and other GHGs in the atmosphere is the alleged primary result of human-induced warming.

Worldwide emissions of GHGs in 2008 were 30.1 billion metric tons of CO₂e and have increased considerably since that time (United Nations, 2011). It is important to note that the global emissions inventory data are not all from the same year and may vary depending on the source of the data (U.S. EPA, 2019). Emissions from the top five emitting countries and the European Union accounted for approximately 70% of total global GHG emissions in 2014. The United States was the number two producer of GHG emissions behind China. The primary GHG emitted by human activities was CO₂, representing approximately 76% of total global GHG emissions (U.S. EPA, 2022).

CARB is responsible for developing and maintaining the California GHG emissions inventory and for implementing California regulations aimed at reducing statewide GHGs. The inventory estimates the amount of GHGs emitted into and removed from the atmosphere by human activities within the state of California and supports the Assembly Bill (AB) 32 Climate Change Program. CARB's current GHG emission inventory covers

the years 2000 through 2023 and is based on fuel use, equipment activity, industrial processes, and other relevant data (e.g., housing, landfill activity, and agricultural lands).

CARB estimates that transportation was the source of approximately 38% of California's GHG emissions in 2023, followed by electricity generation at 16%. Other sources of GHG emissions were generated by industrial sources at 22%, residential plus commercial activities at 17%, and agricultural sources at 8% (CARB 2025a). From the available GHG data, the industrial sector accounted for an estimated 22.0% of the 2023 emissions, which is a 4.8% decrease from 2022. This reduction is contributed to lowering emissions in the oil and gas production and processing sector, the liquid fuels refining and hydrogen production sector, and the cement sector.

3.7.2 Effects of Global Climate Change

Changes in the global climate are assessed using historical records of temperature changes that have occurred in the past. Climate change scientists use this temperature data to extrapolate a level of statistical significance specifically focusing on temperature records from the last 150 years (the Industrial Age) that differ from past climate changes in rate and magnitude.

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. In its Fifth Assessment Report, the IPCC predicted that the global mean temperature change from 1990 to 2100 could range from 1.1 degree Celsius (°C) to 6.4 °C (8 to 10.4 °Fahrenheit) (IPCC, 2013). Global average temperatures and sea levels are expected to rise under all scenarios (IPCC, 2014). The IPCC concluded that global climate change was largely the result of human activity, mainly the burning of fossil fuels.

Effects from global climate change may arise from temperature increases, climate sensitive diseases, extreme weather events, and degradation of air quality. There may be direct temperature effects through increases in average temperature leading to more extreme heat waves and less extreme cold spells. Those living in warmer climates are likely to experience more stress and heat-related problems. Heat-related problems include heat rash and heat stroke, drought, etc. In addition, climate-sensitive diseases may increase, such as those spread by mosquitoes and other disease-carrying insects. Such diseases include malaria, dengue fever, yellow fever, and encephalitis. Extreme events such as flooding and hurricanes can displace people and agriculture. Global warming may also contribute to air quality problems from increased frequency of smog and particulate air pollution.

According to the 2006 California Climate Action Team (CAT) Report, several climate change effects can be expected in California over the course of the next century (CalEPA 2006). These are based on trends established by the IPCC and are summarized below.

- ▶ A diminishing Sierra snowpack declining by 70% to 90%, threatening the state's water supply.
- ▶ A rise in sea levels, resulting in the displacement of coastal businesses and residences. During the past century, sea levels along California's coast have risen about seven inches. If emissions continue unabated and temperatures rise into the higher anticipated warming range, sea level is expected to rise an additional 22 to 35 inches by the end of the century. Sea level rises of this magnitude would inundate coastal areas with salt water, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. (Note: This condition would not affect the Proposed Project area, as it is a significant distance away from coastal areas.)
- ▶ An increase in temperature and extreme weather events. Climate change is expected to lead to increases in the frequency, intensity, and duration of extreme heat events and heat waves in California. More heat waves can exacerbate chronic disease or heat-related illness.

- ▶ Increased risk of large wildfires if rain increases as temperatures rise. Wildfires in the grasslands and chaparral ecosystems of southern California are estimated to increase by approximately 30% toward the end of the 21st century because more winter rain will stimulate the growth of more plant fuel available to burn in the fall. In contrast, a hotter, drier climate could promote up to 90% more northern California fires by the end of the century by drying out and increasing the flammability of forest vegetation.
- ▶ Increasing temperatures from 8 to 10.4 °F under the higher emission scenarios, leading to a 25% to 35% increase in the number of days that ozone pollution levels are exceeded in most urban areas (see below).
- ▶ Increased vulnerability of forests due to forest fires, pest infestation, and increased temperatures.
- ▶ Reductions in the quality and quantity of certain agricultural products. The crops and products likely to be adversely affected include wine grapes, fruit, nuts, and milk.
- ▶ Exacerbation of air quality problems. If temperatures rise to the medium warming range, there could be 75 to 85% more days with weather conducive to ozone formation in Los Angeles and the San Joaquin Valley, relative to today's conditions. This is more than twice the increase expected if rising temperatures remain in the lower warming range. This increase in air quality problems could result in an increase in asthma and other health-related problems.
- ▶ A decrease in the health and productivity of California's forests. Climate change can cause an increase in wildfires, an enhanced insect population, and establishment of non-native species.
- ▶ Increased electricity demand, particularly in the hot summer months.
- ▶ Increased ground-level ozone formation due to higher reaction rates of ozone precursors.

3.7.3 Global Climate Change Regulatory Issues

Global warming and climate change have received substantial public attention for more than 20 years. For example, the United States Global Change Research Program was established by the Global Change Research Act of 1990 to enhance the understanding of natural and human-induced changes in the Earth's global environmental system, to monitor, understand, and predict global change, and to provide a sound scientific basis for national and international decision-making. Even so, the analytical tools have not been developed to determine the effect on worldwide global warming from a particular increase in GHG emissions, or the resulting effects on climate change in a particular locale. The scientific tools needed to evaluate the impacts that a specific project may have on the environment are yet to be developed.

In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United Nations Framework Convention on Climate Change established an agreement with the goal of controlling GHG emissions, including methane. As a result, the Climate Change Action Plan was developed to address the reduction of GHGs in the United States. The plan consists of more than 50 voluntary programs. Additionally, the Montreal Protocol was originally signed in 1987 and substantially amended in 1990 and 1992. The Montreal Protocol stipulates that the production and consumption of compounds that deplete O₃ in the stratosphere (chlorofluorocarbons [CFCs], halons, carbon tetrachloride, and methyl chloroform) were phased out by 2000 (methyl chloroform was phased out by 2005).

While acknowledging that national and international actions will be necessary to fully address the issue of global warming, the California Global Warming Solutions Act of 2006 (AB 32) lays out a program to inventory and reduce GHG emissions in California and from power generation facilities located outside the state that serve California residents and businesses. AB 32 charged CARB with responsibility to monitor and regulate sources of GHG emissions in order to reduce those emissions. CARB adopted a list of discrete early action measures that can be implemented to reduce GHG emissions. AB 32 mandated a cap of California's GHG emissions at 1990 levels by 2020. AB 32 was the first enforceable statewide program in the U.S. to cap all GHG emissions from major industries that includes penalties for non-compliance.

Subsequent legislation by the California legislature has included Senate Bill (SB) 32, which expanded upon AB 32 to reduce GHG emissions to 40% below the 1990 levels by 2030; AB 197 which increased the legislative oversight of the CARB by adding two legislatively appointed non-voting members to the CARB Board and provided additional protection to disadvantaged communities; SB 350, which increased California's renewable energy electricity procurement goal and SB 100, which established a landmark policy requiring renewable energy and zero-carbon resources to supply 100 percent of electrical retail sales to end use customers and 100 percent of electricity procured to serve state agencies by 2045.

3.7.4 GHG Regulatory Setting

3.7.4.1 International

3.7.4.1.1 Kyoto Protocol

The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change (UNFCCC). The major feature of the Kyoto Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHGs an average of 5% against 1990 levels over the five-year period from 2008–2012. Whereas the UNFCCC only encouraged industrialized countries to stabilize emissions, the Protocol commits them to do so. Developed countries have contributed more emissions over the last 150 years than underdeveloped countries; therefore, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities." The United States has not entered into force of the Kyoto Protocol.

3.7.4.1.2 Paris Agreement

In April 2015, representatives from 196 state parties signed the Paris Agreement, an agreement within the UNFCCC, dealing with GHG emissions mitigation, adaptation, and finance with the goals of keeping the global average temperature increase below 2 °C (3.6 °F) above pre-industrial levels, and ideally, below 1.5 °C (2.7 °F) recognizing that this would substantially reduce the risks and impacts of climate change. Each signatory country must plan, implement, and regularly report on the actions taken to mitigate climate change. While there are no overarching emissions targets or deadlines, each self-determined target should go beyond previously set targets. In June 2017, the U.S. announced its intention to withdraw from the agreement; however, the earliest effective date of withdrawal for the U.S. was November 2020. In response to this announcement, the United States Climate Alliance was formed by governors committing to uphold the objectives of the Paris Agreement as applicable to their states. California is a member of the United States Climate Alliance. After rejoining the Paris Agreement in January 2021, the U.S., under the new presidential administration in January 2025, issued Executive Order 14162, which calls for withdrawing from the agreement.

3.7.4.2 Federal

3.7.4.2.1 Federal Regulation of Climate Change

The United States historically has had a voluntary approach to reducing GHG emissions. However, on April 2, 2007, the U.S. Supreme Court ruled that the U.S. EPA has the authority to regulate CO₂ emissions under the CAA. The U.S. EPA's GHG Tailoring Rule, issued in May 2010, established initial emission thresholds for Prevention of Significant Deterioration (PSD) and Title V permitting based on CO_{2e} emissions. This rule was amended in 2012, then in 2014, the U.S. Supreme Court decided that EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V

permit. However, PSD permits that are otherwise required (based on emissions of other non-GHG regulated pollutants) may continue to limit GHG emissions through BACT requirements.

3.7.4.2.2 Greenhouse Gas Reporting Program (GHGRP)

U.S. EPA's GHGRP, codified at 40 CFR Part 98, requires GHG data reporting from large GHG emission sources, fuel and industrial gas suppliers, and carbon dioxide injection sites in the United States. In general, the GHGRP applies to facilities that emit 25,000 MT CO₂e or more per year in the United States and requires such facilities to submit GHG emission reports on an annual basis. U.S. EPA electronically verifies data submitted and publishes the data.

3.7.4.3 *State*

3.7.4.3.1 Assembly Bill 32

The California Global Warming Solutions Act of 2006 (AB 32), requires a sharp reduction of GHG emissions in California in preparation to transition the State to a sustainable, low-carbon future. AB 32 defined GHG emissions as comprising all the following gases: CO₂, CH₄, N₂O, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Pursuant to AB 32, CARB has adopted various programs and regulations with the goal of achieving maximum GHG emission reductions considering technological feasibility and cost-effectiveness.

CARB's Mandatory Reporting of Greenhouse Gas Emissions (MRR) program is a program that CARB developed and adopted under AB 32 MRR. The MRR (codified at Title 17, CCR, sections 95100-95157) incorporates certain requirements promulgated by U.S. EPA's GHGRP and is applicable to electricity generators, industrial facilities, fuel suppliers, and electricity importers. In general, the MRR applies to facilities that emit 10,000 MT CO₂e or more per year in California and requires such facilities to submit GHG emission reports on an annual basis. The MRR also requires the independent verification of GHG emissions data reports by a CARB-accredited verification body. CARB then publishes the publicly available data.

Another program that CARB developed and adopted under AB 32 is the California Cap-and-Invest Program, which applies to electricity generators, distributors of transportation, natural gas, and other fuels, and large industrial facilities emitting 25,000 MT CO₂e or more annually in California. Facilities subject to Cap-and-Invest are considered "covered entities," and are required to register with the Cap-and-Invest Program, report and verify GHG emissions pursuant to the MRR, submit valid compliance instruments to fulfill the compliance obligation, and retain applicable records. Cap-and-Invest establishes a limit, or cap, on GHG emissions from covered entities. The cap commenced in 2013 and declines over time, achieving GHG emission reductions over time in alignment with AB 32. The cap is used to allocate emission credits, which are distributed to covered facilities. A facility's credits give them permission to release a certain quantity of emissions. Facilities with more credits than they need can sell them as offsets, enabling other facilities to buy the right to emit more.

3.7.4.3.2 Assembly Bill 1493

AB 1493 required that the state develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of climate change emissions emitted by passenger vehicles and light duty trucks. To comply with AB 1493, CARB implemented amendments to the California Code of Regulations in 2004, incorporating GHG emissions standards into the state's existing motor vehicle emissions regulations. In 2009, CARB further updated the "Pavley" regulations to enhance GHG reductions in new passenger vehicles for model years 2009 through 2016.

3.7.4.3.3 Assembly Bill 1395

AB 1395, introduced in 2021, known as the California Climate Crisis Act, was introduced to accelerate the state's efforts to combat climate change and achieve ambitious GHG reduction goals. Building on the foundation of the California Global Warming Solutions Act of 2006, which set a target to reduce GHG emissions to 40% below 1990 levels by 2030, AB 1395 establishes a new policy to achieve net-zero GHG emissions in California as soon as possible, but no later than 2045. The bill aims for California to not only reach net-zero emissions by 2045 but to continue beyond that point by achieving and maintaining net-negative emissions.

3.7.4.3.4 California Renewables Portfolio Standard (RPS)

Established in 2002 under Senate Bill 1078, the RPS mandates that load-serving entities progressively procure a greater percentage of their electricity from renewable resources. The program's targets have been updated over time, with Senate Bill 100, enacted in 2018, setting ambitious goals of achieving 60% renewable energy by 2030 and 100% carbon-free electricity by 2045.

3.7.4.4 *GHG CEQA Evaluation and CA Supreme Court Ruling*

The California Supreme Court's most recent CEQA decision on the Newhall Ranch development case, *Center for Biological v. California Department of Fish and Wildlife* (November 30, 2015, Case No. 217763), determined that the project's Environmental Impact Report (EIR) did not substantiate the conclusion that the GHG cumulative impacts would be less than significant. The EIR determined that the Newhall Ranch development project would reduce GHG emissions by 31 percent from business as usual (BAU). This reduction was compared to California's target of reducing GHG emissions statewide by 29 percent from business as usual. The Court determined that "the EIR's deficiency stems from taking a quantitative comparison method developed by the Scoping Plan as a measure of the GHG reduction effort required by the state as a whole, and attempting to use that method, without adjustments, for a purpose very different from its original design." In the Court's final ruling it offered suggestions that were deemed appropriate use of the BAU methodology:

1. Lead agencies can use the comparison to BAU methodology if they determine what reduction a particular project must achieve in order to comply with statewide goals,
2. Project design features that comply with regulations to reduce emissions may demonstrate that those components of emissions are less than significant, and
3. Lead agencies could also demonstrate compliance with locally adopted climate plans or could apply specific numerical thresholds developed by some local agencies.

The City of Paramount, the Lead CEQA agency for this Project, has not developed specific thresholds for GHGs. As discussed in **Section 6.1.2**, the South Coast AQMD, a CEQA Responsible Agency for this Project, has developed thresholds to determine significance of a proposed project – 10,000 metric tons of CO_{2e}, an established Best Performance Standards threshold. Additionally, the South Coast AQMD AQMP includes best performance standards which will also be considered as part of this Project's impact evaluation (**Table 3-8**). Therefore, the GHG analysis for this Project follows the suggestions from the Court's ruling on the Newhall Ranch development project in order to determine significance through use of specific numerical thresholds.

Table 3-8. AQMP Best Performance Standards

Control Measure	Description
Stationary Source NOx Measures	
L-CMB-02: Reduction from boilers and process heaters (Permitted)	This control measure applies to facilities with boilers and process heaters with a rated heat input of greater than or equal to 2 million BTU/hr. This control measure aims to reduce NOx emissions by replacing or retrofitting boilers and process heaters with zero and low NOx emission technology.
L-CMB-04: Emissions Reductions from emergency standby engines (permitted)	This control measure applies to facilities with emergency standby internal combustion engines rated over 50 bhp. This control measure aims to encourage the transition to newer technologies with low NOx emissions.
L-CMB-10: NOx reductions from miscellaneous permitted equipment	This control measure applies to miscellaneous permitted equipment regulated under Rule 1147, <i>NOx Reductions from Miscellaneous Sources</i> .
Stationary Source VOC Measures	
CTS-01: Further emission reductions from coatings, solvents, adhesives, and lubricants	This control measure applies to facilities that use select coatings, adhesives, solvents, and sealants. This control measure aims to reduce emissions of VOCs through super-compliant zero and low VOC materials.
Emission Growth Management Measures	
EGM-01: Emission reductions from new development and redevelopment	This control measure applies to new development or redevelopment industrial projects. This control measure aims to identify emission reduction opportunities and to mitigate and reduce emissions.
On-Road and Off-Road Mobile Sources	
MOB-05: Accelerated retirement of older light-duty and medium duty vehicles	This control measure applies to facilities using gasoline and diesel-powered vehicles with up to 8,500 lbs. gross vehicle weight rating (GVWR). This control measure aims to achieve emission reductions by retiring up to 2,000 light and medium duty vehicles annually and replace with cleaner conventionally powered vehicles or plug-in hybrid electric vehicles.
MOB-15: Zero emission infrastructure for mobile source.	This control measure applies to facilities with mobile sources of emissions and aims to develop a plan to accelerate the deployment of zero emission infrastructure by coordinating with stakeholders and address information gaps in planning and development.

4. REGULATORY SETTING

AAQS in California are the responsibility of, and have been established by, both the U.S. EPA and CARB. These standards have been set at concentrations that provide margins of safety for the protection of public health and welfare. Federal and state air quality standards are presented above in **Table 3-3**. The South Coast AQMD has established levels of episodic criteria and has indicated measures that must be initiated to immediately reduce contaminant emissions when these levels are reached or exceeded. The federal, state, and local air quality regulations are described in further detail in the following sections.

4.1 Federal

4.1.1 Clean Air Act

The U.S. EPA has jurisdiction over emissions sources that are under the authority of the federal government including aircraft, locomotives, and emissions sources outside of state waters (Outer Continental Shelf). U.S. EPA is responsible for implementing the CAA, which is the comprehensive federal law that regulates air emissions from stationary and mobile sources.

The CAA is designed to attain compliance with the NAAQS adopted by the U.S. EPA (42 United States Code (U.S.C.) § 7409). U.S. EPA has adopted NAAQS for O₃, CO, NO₂, SO₂, PM₁₀, PM_{2.5}. (40 CFR Part 50.) For planning purposes, U.S. EPA has divided the country into separate "air quality control regions" (42 U.S.C. § 7407; 40 CFR Part 81). U.S. EPA must determine whether each air quality region is in "attainment" or "nonattainment" of the NAAQS for each criteria pollutant (42 U.S.C. § 7407(d)(4); 42 U.S.C. § 7501(2)). Once a region is designated as in nonattainment, the CAA requires states to prepare a "state implementation plan" (SIP) (42 U.S.C. § 7410). Each SIP must provide for: (1) "implementation of all reasonably available control measures as expeditiously as practicable," and (2) the attainment of the NAAQS. U.S. EPA must review and approve each proposed SIP (42 U.S.C. § 7410(a)(1)).

The South Coast Air Basin is an air quality control region under the CAA. The South Coast AQMD is responsible for preparing the Basin's AQMP (Health and Safety Code § 40408). The AQMP serves as the SIP under the CAA (Health and Safety Code § 40460). The AQMP sets forth a variety of general "control measures" designed to attain and maintain the NAAQS within the Basin (Health and Safety Code § 40913).

The CAA is organized into seven main sections:

- ▶ Title I – Air Pollution Prevention and Control
 - Part A – Air Quality and Emission Limitations
 - Part B – Ozone Protection
 - Part C – Prevention of Significant Deterioration (PSD) of Air Quality
 - Part D – Plan Requirements for Nonattainment Areas
- ▶ Title II – Emission Standards for Moving Sources
 - Part A – Motor Vehicle Emission and Fuel Standards
 - Part B – Aircraft Emission Standards
 - Part C – Clean Fuel Vehicles
- ▶ Title III – General Provisions
- ▶ Title IV – Noise Pollution
- ▶ Title IV-A – Acid Deposition Control
- ▶ Title V – Permits

► Title VI – Stratospheric Ozone Protection

Title I Part C of the CAA is Prevention of Significant Deterioration (PSD), which applies to new major sources or major modifications at existing sources for pollutants where the area that the source is located in is in attainment or unclassifiable with the NAAQS. It requires installation of the “Best Available Control Technology” (BACT), an air quality analysis, an additional impacts analysis, and public involvement. PSD review will not be required for the proposed Project, because it does not constitute a new major source or major modification to an existing source (physical change to existing equipment). Title III of the CAA regulates TACs and is applicable to the proposed Project as analyzed in Chapter 4. Title V of the CAA establishes a federal permit program. The Title V program is implemented by the South Coast AQMD for areas within its jurisdiction via South Coast AQMD Regulation XXX – Title V Permits. Title V permits incorporate all federally enforceable requirements as well as state and local requirements.

4.1.2 Greenhouse Gas Reporting Program (GHGRP)

U.S. EPA’s GHGRP, codified at 40 CFR Part 98, requires GHG data reporting from large GHG emission sources, fuel and industrial gas suppliers, and carbon dioxide injection sites in the United States. In general, the GHGRP applies to facilities that emit 25,000 MT CO₂e or more per year in the United States and requires such facilities to submit GHG emission reports on an annual basis. U.S. EPA electronically verifies data submitted and publishes the data.

Castle is not currently subject to the GHGRP and will not become subject as a result of the Project.

4.2 State

4.2.1 CAAQS

The California Clean Air Act sets forth a state regulatory program that is parallel to the federal CAA program. The California CAA is designed to attain compliance with the CAAQS within specified “air quality basins” (Health and Safety Code § 39606). CARB has adopted CAAQS for all pollutants for which the federal government has NAAQS, and has also established standards for sulfates, visibility, H₂S, and vinyl chloride. California standards are generally more stringent than the NAAQS. Federal and state air quality standards are presented in **Table 3-3**.

For the most part, CARB’s air quality basins have the same boundaries as U.S. EPA’s air quality control regions. Like U.S. EPA under the Federal CAA, CARB must determine whether each air quality basin is attainment or nonattainment of the CAAQS for each criteria pollutant (Health and Safety Code § 39608). An “attainment plan” must be prepared for each nonattainment region (Health and Safety Code § 40911). Like federal SIPs, attainment plans must demonstrate how nonattainment basins will achieve and maintain the CAAQS (Health and Safety Code § 40913). Within each region/basin, the same document generally serves as both the SIP and the attainment plan (Health and Safety Code § 41650(a)). These plans are variously referred to as “air quality management plans”, “air quality maintenance plans”, “attainment plans”, or “non-attainment plans”. CARB must review and approve each attainment plan (Health and Safety Code § 40911).

The South Coast Air Basin is an air quality basin under the California CAA. The South Coast AQMD’s AQMP serves as the attainment plan under the California Act for the Basin (Health and Safety Code § 40460). The AQMP sets forth a variety of general “control measures” designed to attain and maintain the CAAQS within the Basin (Health and Safety Code § 40913). Thus, the AQMP serves the same purpose under the California CAA and the parallel CAA – it provides a blueprint for attaining compliance with both the NAAQS and the

CAAQS. CARB, which became part of the CalEPA in 1991, is responsible for ensuring implementation of the California CAA and federal CAA, and for regulating emissions.

4.2.2 AB 617 Community Air Protection Program

On July 26, 2017, Governor Brown approved Assembly Bill No. 617 ("AB 617"). AB 617 added and amended various sections of the California Health and Safety Code. The intent of AB 617 is to develop a collaborative relationship between CARB and local air districts to facilitate community participation, provide a science-based foundation supporting the identification of communities with high cumulative exposure burdens, accelerate the development and use of advanced air monitoring methods and equipment, and support the use of new mobile and stationary source technology. To achieve those goals, AB 617 requires six significant measures: (1) Annual Reporting; (2) Best Available Retrofit Control Technology ("BARCT"); (3) a Statewide Clearinghouse of BARCT; (4) Community Air Monitoring; (5) Community Emissions Reduction Programs; and (6) Increased Penalties.

The AB 617 Program's focus is to reduce exposure in communities most impacted by air pollution. A central component of the program is the selection of specific communities in which the Community Air Monitoring and Community Emissions Reductions Programs take place. These communities are selected based on community exposure to air pollution. In 2019, the community of Southeast Los Angeles (South Gate, Florence-Firestone, Walnut Park, Huntington Park, Cudahy, and Bell Gardens) was nominated by South Coast AQMD and selected by CARB as an AB 617 community. Additionally, in 2021, the community of South Los Angeles (Hyde Park, Jefferson Park, University Park, Exposition Park, and historic South Central, Vermont, and Florence) was nominated by South Coast AQMD and selected by CARB as an AB 617 community. Castle is located just south and east, respectively, of these two communities but is not subject to the community programs.

4.2.3 AB 2588

The Air Toxic "Hot Spots" Information and Assessment Act (AB 2588), as amended by Senate Bill (SB) 1731, requires operators of certain stationary sources to inventory air toxic emissions from their operations and, if directed to do so by the local air district, prepare a health risk assessment (HRA) to determine the potential health impacts of such emissions. If the health impacts are determined to be "significant" (greater than 10 per one million exposures or non-cancer hazard index greater than 1.0), each facility operator must, upon approval of the HRA, provide public notification to affected individuals.

Castle Metals may be subject to the requirements of AB 2588.

4.2.4 Proposition 65

Proposition 65, officially named the "Safe Drinking Water and Toxic Enforcement Act of 1986," became law in California in 1986. The Proposition was intended to protect California citizens and the State's drinking water sources from chemicals known to cause cancer, birth defects, or other reproductive harm, and to inform citizens about exposure to such chemicals. Under the statute, the state must maintain and update a list of such chemicals. Additionally, a person doing business cannot expose an individual to such a chemical without first giving a clear and reasonable warning. The warning can be provided in various ways, such as by labeling a consumer product, posting signs at the workplace, or distributing or publishing notices.

Castle Metals may be subject to the requirements of Proposition 65.

4.2.5 AB 32: MRR and Cap-and-Invest

The California Global Warming Solutions Act of 2006 (AB 32), requires a sharp reduction of GHG emissions in California in preparation to transition the State to a sustainable, low-carbon future. Pursuant to AB 32, CARB has adopted various programs and regulations with the goal of achieving maximum GHG emission reductions considering technological feasibility and cost-effectiveness.

MRR, introduced in **Section 3.7.4.3.1** above, is one program that CARB developed and adopted under AB 32. The MRR (codified at Title 17, CCR, sections 95100-95157) incorporates certain requirements promulgated by U.S. EPA's GHGRP and is applicable to electricity generators, industrial facilities, fuel suppliers, and electricity importers. In general, the MRR applies to facilities that emit 10,000 MT CO₂e or more per year in California and requires such facilities to submit GHG emission reports on an annual basis. The MRR also requires the independent verification of GHG emissions data reports by a CARB-accredited verification body. CARB then publishes the publicly available data. Castle Metals is not currently subject to the GHG MRR and will not become subject as a result of this Project.

Another program that CARB developed and adopted under AB 32 is the California Cap-and-Invest Program, which applies to electricity generators, distributors of transportation, natural gas, and other fuels, and large industrial facilities emitting 25,000 MT CO₂e or more annually in California. Facilities subject to Cap-and-Invest are considered "covered entities," and are required to register with the Cap-and-Invest Program, report and verify GHG emissions pursuant to the MRR, submit valid compliance instruments to fulfill the compliance obligation, and retain applicable records. Cap-and-Invest establishes a limit, or cap, on GHG emissions from covered entities. The cap commenced in 2013 and declines over time, achieving GHG emission reductions over time in alignment with AB 32. The cap is used to allocate emission credits, which are distributed to covered facilities. A facility's credits give them permission to release a certain quantity of emissions. Facilities with more credits than they need can sell them as offsets. Castle Metals is not currently subject to the Cap-and-Invest Program and will not become subject as a result of this Project.

4.3 Regional

The South Coast AQMD has regulatory authority over stationary sources and air pollution control equipment, and limited authority over mobile sources for areas within its jurisdiction. The South Coast AQMD is responsible for air quality planning in the Basin and the development of the AQMP. The AQMP establishes the strategies that will be used to achieve compliance with CAAQS in all areas within the South Coast AQMD's jurisdiction. The South Coast AQMD rules and regulations which are applicable to Castle Metals include, but are not limited to, the following:

- ▶ Rule 203 – Permit to Operate
- ▶ Rule 212 – Standards for Approving Permits
- ▶ Rule 222 – Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II
- ▶ Rule 301 – Permitting and Associated fees
- ▶ Rule 401 – Visible Emissions
- ▶ Rule 402 – Nuisance
- ▶ Rule 403 – Fugitive Dust
- ▶ Rule 404 – Particulate Emissions
- ▶ Regulation XIII – NSR, including key rule (Rule 1303 – Requirements)
- ▶ Rule 1159.1 – Control of NO_x Emissions from Nitric Acid Tanks
- ▶ Rule 1401 – New Source Review of Toxic Air Contaminants
- ▶ Rule 1402 – Control of Toxic Air Contaminants from Existing Sources

► Rule 1426 – Emissions from Metal Finishing Operations

4.3.1 Rule 203

Rule 203 applies to facilities, including Castle Metals, that operate any equipment that may cause air contaminant emissions. This rule requires that the facility obtains a written permit to operate from the Executive Officer.

4.3.2 Rule 212

Rule 212 applies to facilities, including Castle Metals, that require a Permit to Operate (PTO). This rule sets the standards for approving permits to operate to ensure the facility eliminates, reduces, or controls air contaminant emissions.

4.3.3 Rule 222

Rule 222 applies to facilities, including Castle Metals, not requiring a written permit pursuant to Regulation II for specific emission sources.

4.3.4 Rule 301

Rule 301 provides authority for the South Coast AQMD to adopt a fee schedule for the issuance of permits to cover the cost of evaluation, planning, inspection, and monitoring related to that activity.

4.3.5 Rule 401

Rule 401 applies to facilities, including Castle Metals, that have visible emissions. This rule requires that the facility will not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour that darker or of high opacity.

4.3.6 Rule 402

Rule 402 applies to facilities, including Castle Metals, that emit air contaminants. This rule requires that the facility will not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to the public.

4.3.7 Rule 404

Rule 404 applies to facilities, including Castle Metals, that emit particulate matter. This rule aims to ensure there is not an excess of particulate matter emissions.

4.3.8 Rule 1146.2

Rule 1146.2 applies to natural gas water heaters, boilers, and process heaters with a heat input capacity less than or equal to 2 MMBtu/hour. This rule will apply to Castle Metals' boiler, even though the boiler does not require a written permit pursuant to Regulation II. Rule 1146.2 requires a zero-emission phase out; Castle Metals will be required to replace the natural gas boiler with an electric boiler by January 1, 2031.

4.3.9 Rule 1159.1

Rule 1159.1 applies to facilities with Nitric Acid Unit(s). Castle Metals will have two chemical milling tanks that are considered Nitric Acid Units according to the rule. The fumes from these chemical milling tanks will be routed to a scrubber that meets the control requirements of Rule 1159.1.

4.3.10 Rule 1401

Rule 1401 applies to facilities, including Castle Metals, with new, relocated, or modified equipment that emit TACs. This rule establishes allowable health risks for permit units that require new permits. Rule 1401 applies to Castle Metals' permit units based on the maximum potential to emit.

4.3.11 Rule 1402

Rule 1402 applies to facilities, such as Castle Metals, which are subject to the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588), and facilities with emissions that exceed significant or action risk levels. This rule reduces the health risk associated with emissions of TACs from existing sources by specifying limits for the Maximum Individual Cancer Risk (MICR), cancer burden, and non-cancer acute and chronic Hazard Index (HI) and requiring facilities to implement risk reduction plans to achieve these risk limits, as required by the Hot Spots Act and this rule. Rule 1402 requires preparation of an HRA to demonstrate compliance with specified limits. If South Coast AQMD deems that the facility is required to report toxic emissions under AB 2588 and if the toxic emissions exceed the Rule 1402 thresholds, then Castle Metals will be required to prepare an HRA.

4.3.12 Rule 1426

Rule 1426 applies to metal finishing facilities, which includes any anodizing, conversion coating, electroforming, electroless plating, electroplating, electropolishing, etch, passivation, pre-dip, sealing, or stripping by submerging the part into a tank or series of tanks with solution that contains a metal. The chemical milling process is considered etching, per South Coast AQMD's staff report². Castle Metals will meet the exemption requirements of Rule 1426(j)(2), which requires the concentration of metal to be less than 1000 ppm or that the tank solution be replaced at least once every six months. Therefore, Castle Metals is only subject to the recordkeeping and reporting requirements of Rule 1426(h).

² https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1426/par1426_dsr_030221.pdf?sfvrsn=6

5. AIR QUALITY AND GHG ANALYSIS METHODS

5.1 Current Operations

This section describes the existing operations and the analysis methods applicable for Castle Metals' current operations. As discussed in the Project Description, the existing operations at Castle Metals include precision cutting of titanium, aluminum, and steel. Incoming metal materials are straightened to the selected thickness, cut using high-precision machinery, polished, then packaged for export. The list below provides the emission sources from existing operations and the calculation methodology for each source. Detailed calculations are provided in Appendix B.

- ▶ Passenger vehicles
 - Castle Metals currently has 30 existing employees. Emissions from employee trips were calculated based on number of employees, operating schedule of 5 days per week, average trip distance per CalEEMod Appendix G, Table G-15, and emission factors from EMFAC2021³ for LDA, LDT1, and LDT2.
- ▶ Trucks
 - Castle Metals currently receives an average of 8 trucks per day. Emissions from truck trips were calculated based on number of truck trips, operating schedule of 5 days per week, average trip distance per CalEEMod Appendix G, Table G-15, and emission factors from EMFAC2021³ for T7 Single Other Class 8.
- ▶ Forklifts
 - Castle Metals currently has 2 side loaders and 8 forklifts that are powered by propane. All other equipment is electric. Emissions were calculated based on number of equipment, maximum operating schedule of 8 hours per day and 5 days per week, and emission factors based on CARB's OFFROAD database. Emissions data for the 2026 calendar year, large spark ignition forklifts, aggregate model year, aggregated horsepower, and propane fuel were used to calculate hourly emission factors. Emission factors were calculated by utilizing the tons per day of each pollutant, converting to pounds, multiplying by 365 days per year, then dividing by the total activity in hours/year.
- ▶ Dust Collector
 - Castle Metals currently has one dust collector. The manufacturer test data provided the grain loading, and control efficiency of the dust collector, and the flow rate was provided by the dust collector specifications plate. Emissions were calculated based on a maximum operating schedule of 8 hours per day and 5 days per week, the grain loading, flow rate, and control efficiency of the dust collector.

5.2 Proposed Project

5.2.1 Short-Term Construction Emissions

As indicated in the project description, there are no ground-disturbing construction activities proposed. Therefore, short-term emissions are not quantified.

³ EMFAC2021 emission factors were used instead of EMFAC2025. As of the date of this report, CARB indicated plans to update EMFAC2025 to address ongoing federal actions. EMFAC2021 has already been updated per these federal actions and are therefore more conservative.

5.2.2 Long-Term Operations Emissions

The proposed Project will add a new chemical milling process. This chemical milling process will add several emission sources. The list below provides the additional proposed emission sources and the calculation methodology for each source. Detailed calculations are provided in Appendix B.

- ▶ Passenger vehicles
 - The chemical milling process will add 3 employees. Emissions from additional employee trips were calculated based on number of employees, operating schedule of 5 days per week, average trip distance per CalEEMod Appendix G, Table G-15, and emission factors from EMFAC2021³ for LDA, LDT1, and LDT2.
- ▶ Trucks
 - The chemical milling process is expected to increase the number of daily truck trips by two. Emissions from the additional truck trips were calculated based on number of truck trips, operating schedule of 5 days per week, average trip distance per CalEEMod Appendix G, Table G-15, and emission factors from EMFAC2021³ for T7 Single Other Class 8.
- ▶ Boiler
 - The chemical milling process will include the use of a 0.9 MMBtu/hr boiler. The boiler meets the exemption criteria in South Coast AQMD Rule 219(d)(2)(C) and will not require a permit. Emissions from the boiler were calculated based on a maximum operating schedule of 8 hours per day and 5 days per week, the heat capacity of the boiler, and South Coast AQMD Combustion Default Emission Factors for Natural Gas Boilers⁴.
- ▶ Scrubber
 - The chemical milling process will include a scrubber that controls NOx emissions from the nitric acid used in the chemical milling tanks. The scrubber will meet a 99% control efficiency, as provided by the manufacturer. Emissions were calculated by conservatively assuming all the nitric acid is converted into NOx and assuming the maximum of one tank capacity of nitric acid is utilized per day. The scrubber is required to have a Permit to Operate (PTO) from South Coast AQMD; Castle Metals will obtain the PTO before starting operations of the chemical milling process.

5.2.3 Greenhouse Gases

5.2.3.1 Current Operations – GHG Emissions

This section describes the calculation methodology for GHG emissions from current operations. Detailed calculations are provided in Appendix B.

- ▶ Passenger vehicles
 - Methodology as described in **Section 5.1**.
- ▶ Trucks
 - Methodology as described in **Section 5.1**.
- ▶ Forklifts
 - Methodology as described in **Section 5.1**.
- ▶ Electricity Usage
 - Electricity usage from current operations is estimated at about 70,000 kWh per month. GHG emissions were calculated based on annual usage and electricity emission factors for Southern California Edison (SCE) from CalEEMod Appendix G, Table G-3.

⁴ https://www.aqmd.gov/docs/default-source/planning/annual-emission-reporting/combustion-default-emission-factors-2024.pdf?sfvrsn=9c358361_9

- ▶ Natural Gas Usage
 - Natural gas usage from current operations is estimated at about 5 therms per month. GHG emissions were calculated based on annual usage and natural gas emission factors from CalEEMod Appendix G, Table G-4.

5.2.3.2 Existing Operations – GHG Emissions

This section describes the calculation methodology for GHG emissions from the proposed operations. Detailed calculations are provided in Appendix B.

- ▶ Passenger vehicles
 - Methodology as described in **Section 5.1.**
- ▶ Trucks
 - Methodology as described in **Section 5.1.**
- ▶ Electricity Usage
 - Electricity usage will increase by about 10,000 kWh per month as a result of the Project. GHG emissions were calculated based on annual usage and electricity emission factors for Southern California Edison (SCE) from CalEEMod Appendix G, Table G-3.
- ▶ Natural Gas Usage
 - Natural gas usage will increase by about 15 therms per month as a result of the Project. GHG emissions were calculated based on annual usage and natural gas emission factors from CalEEMod Appendix G, Table G-4.

5.2.4 Toxic Air Contaminants

South Coast AQMD recommends that projects with heavy duty truck activities and stationary sources with air toxics emissions evaluate potential health risk impacts. For the purposes of the toxic air contaminant analysis, only toxic emissions from the proposed Project were quantified and assessed. This section describes the calculation methodology for the toxic air contaminants. Air Dispersion Modeling

Air dispersion modeling is used to estimate off-site air concentrations of chemicals associated with facility emissions. The American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) is a steady-state Gaussian plume model that can be used to assess ground level pollutant concentrations from a wide variety of sources (point, line, area, or volume) for distances up to approximately 50 km, including urban and rural terrains. AERMOD can calculate ground level concentrations for various averaging periods, such as acute short-term exposures (1-hour averaging), chronic long-term exposures (annual averages), or other required meteorological data periods (i.e., 3-hour, 8-hour, 24-hour). The assumptions used for this model are listed below.

- | | |
|---------------------------|-------------------------------------|
| ▶ AERMOD | Version 24142 |
| ▶ Projection | Universal Transverse Mercator (UTM) |
| ▶ Datum | World Geodetic System (WGS84) |
| ▶ UTM | Zone 11 |
| ▶ Hemisphere | Northern |
| ▶ Selection | Hourly and Period |
| ▶ AERMOD File | .AMI and .AMZ |
| ▶ AERMOD Output File | Plot File by Source |
| ▶ Use Regulatory Default? | Yes |
| ▶ Urban or Rural? | Urban |
| ▶ Building Downwash? | Not Applicable |

Health risk is determined using the Hotspots Analysis and Reporting Program (HARP2) software distributed by the CARB; HARP2 requires peak 1-hour emission rates and annual-averaged emission rates for all pollutants for each modeling source (CARB 2015). Assumptions used to calculate the emission rates for the proposed Project are outlined below.

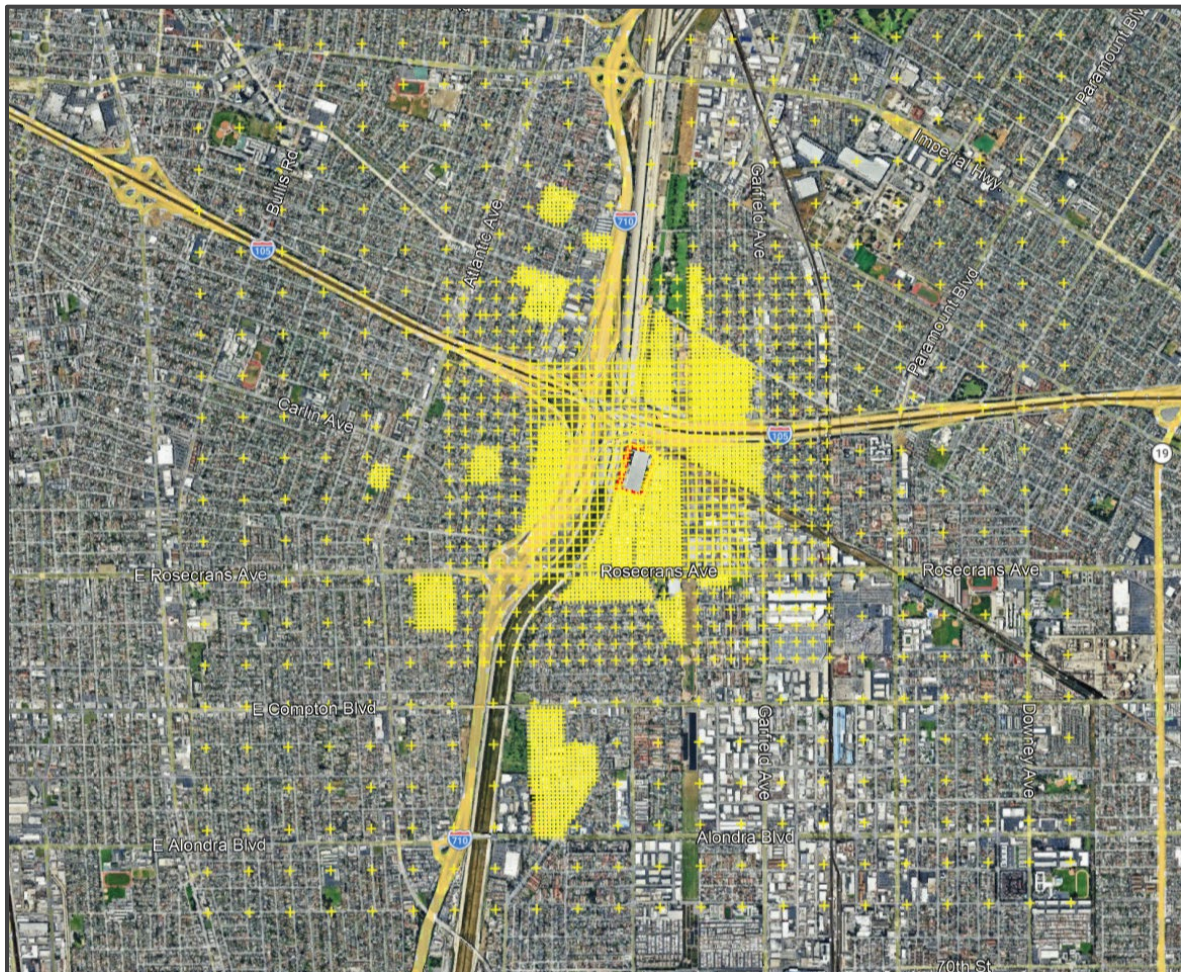
5.2.4.1.1 Emission Sources

Diesel combustion emissions from diesel truck trips were modeled as volume line sources. For off-site travel, the distance to the nearest major road (Rosecrans Avenue) was modeled; for on-site travel, the distance from the north gate to the south gate was modeled. Truck idling was modeled as a point source at the midpoint of the on-site truck travel. The scrubber and boiler were both modeled as point sources at the roof of the building.

5.2.4.1.2 Receptors

Discrete receptors were placed on residences, businesses, and sensitive receptors within close proximity of the Project site. Additionally, a tiered receptor grid was modeled in accordance with SCAQMD's modeling guidance. A total of 3,469 discrete off-site receptors were analyzed. The receptors are shown below in **Figure 5-1**. Elevated terrain options were employed even though there is no complex terrain in the Project area.

Figure 5-1. Receptors Analyzed for Health Risk



5.2.4.1.3 Meteorological Data

South Coast AQMD -provided, AERMET UStar processed meteorological datasets for the Compton monitoring station, calendar years 2012, 2015, and 2016 was utilized in AERMOD. This was the most recent available dataset available at the time the modeling was conducted. Urban dispersion parameters were used since the operation and the majority of the land surrounding the facility is considered "urban" under the Auer land use classification method (Auer 1978).

5.2.4.2 *Hotspots Analysis and Reporting Program (HARP2)*

Plot files generated by AERMOD were uploaded to the Air Dispersion Modeling and Risk Assessment Tool (ADMRT) program in the Hotspots Analysis and Reporting Program Version 2 (HARP2) (CARB 2015). ADMRT post-processing was used to assess the potential for excess cancer risk and chronic non-cancer effects using the most recent health effects data from the California EPA Office of Environmental Health Hazard Assessment (OEHHA).

5.2.4.2.1 Toxic Emissions Quantification

- ▶ Truck Travel
 - Emissions from the increased truck trips were calculated for the on-site portion of the truck travel. Additionally, emissions from truck travel from the facility to the nearest major road (Rosecrans Avenue) were also calculated and included in the health risk assessment. Diesel particulate matter (DPM) emissions from heavy-duty trucks were estimated using EMFAC2021 emission factors. All PM10 emitted from diesel equipment is assumed to be DPM.
- ▶ Truck Idling
 - Emissions from the truck idling were calculated for the additional truck trips from the Project. Diesel particulate matter (DPM) emissions from heavy-duty trucks idling were estimated using EMFAC2021 emission factors. All PM10 emitted from diesel equipment is assumed to be DPM.
- ▶ Boiler
 - Emissions from the boiler were calculated based on a maximum operating schedule of 8 hours per day and 5 days per week, the heat capacity of the boiler, and South Coast AQMD Combustion Default Emission Factors, TAC Emission Factors for External Combustion Equipment with equipment rating <10 MMBtu/hr⁴.
- ▶ Scrubber
 - The chemical milling tanks will include nitric acid and hydrofluoric acid. Evaporative tank emissions were calculated according to AP-42, Chapter 8, Section 4.4, Emission Model for Surface Evaporation⁵.

Detailed calculations are provided in Appendix B.

5.2.4.2.2 Exposure

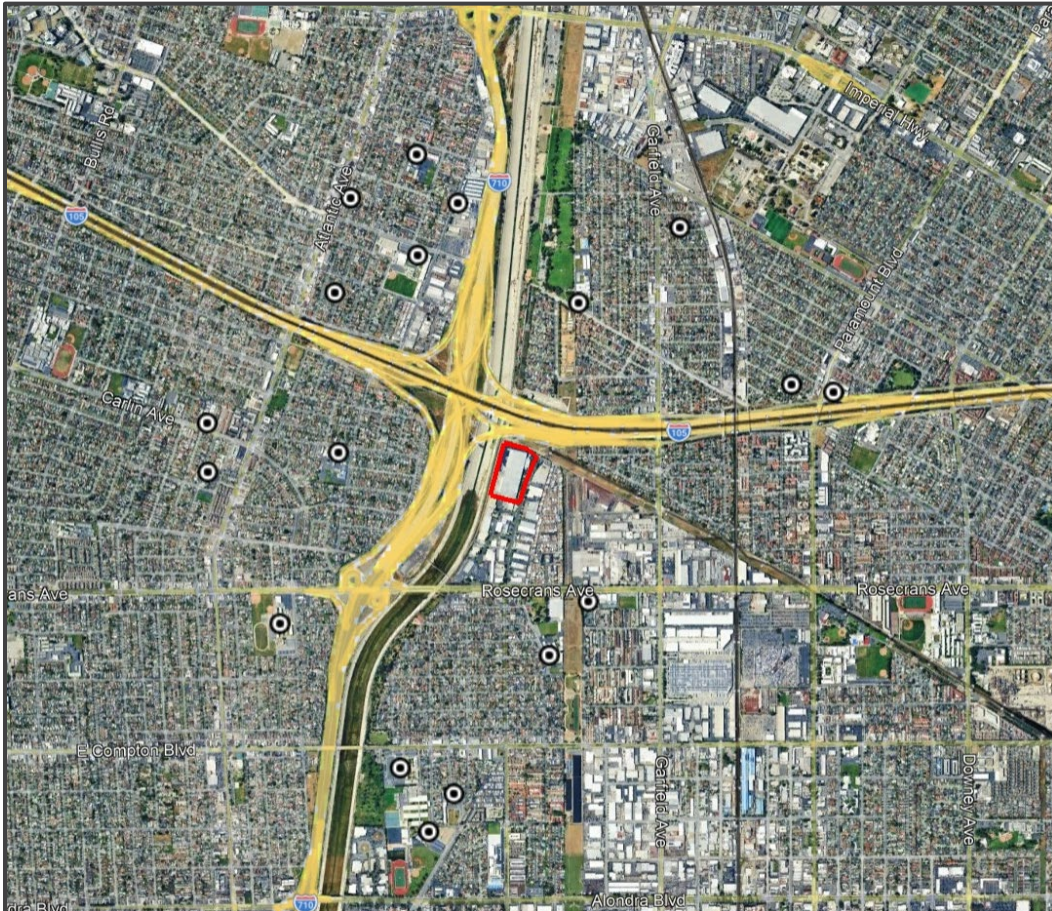
HARP2 site parameters were set for the mandatory minimum pathways (inhalation, soil ingestion, dermal, and mother's milk) and homegrown produce. A 30-year exposure duration was used in accordance with South Coast AQMD guidelines. Risk reports were generated using the "RMP Using the Derived Method" for cancer risk at residential and sensitive receptors and the derived OEHHA analysis method for cancer risk and non-carcinogenic chronic risk at all other receptors. Site parameters are included in the HARP2 output files. Total cancer risk was predicted for each receptor. A hazard index was computed for non-cancer chronic and acute health effects for each applicable endpoint and each receptor.

⁵ https://www.epa.gov/sites/default/files/2015-08/documents/ii08_feb2005.pdf

5.2.5 Potential Impact on Sensitive Receptors

Sensitive receptors are defined as locations where young children, chronically ill individuals, the elderly, or people who are more sensitive than the general population reside, such as schools, hospitals, nursing homes, and daycare centers. **Figure 5-2** below shows the location of the sensitive receptors within a one-mile radius.

Figure 5-2. Sensitive Receptors with 1-Mile Radius of Castle Metals



5.3 Project Design Features and Best Management Practices

As the estimated operational emissions from the proposed Project would be less than significant, no Project-specific mitigation measures would be required. However, to ensure that Project is in compliance with all applicable South Coast AQMD rules and regulations, and to ensure emissions continue to be further reduced to the extent feasible, Castle will continue to implement and comply with a number of measures that are either recommended as a “good operating practice” for environmental stewardship, or measures that are required by regulation. Some of the listed measures are regulatory requirements or construction requirements that would result in further emission reductions through their inclusion in Project long-term design. Additionally, some of the following measures are from South Coast AQMD’s 2016 and 2022 AQMP Mitigation Monitoring and Reporting Program and are presented as “other recommended measures” for the proposed Project.

5.3.1 South Coast AQMD AQMP

The Project would comply with South Coast AQMD's 2022 AQMP, and all applicable stationary and mobile source control measures (see 2022 AQMD, Appendix IV-A).

5.3.2 Other Measures to Reduce Potential Project Impacts

The following measures further reduce the potential for long-term emissions from the Project. These measures are required as a matter of regulatory compliance, and therefore Castle has and would continue to comply with them as needed:

- ▶ The Project design shall comply with applicable standards set forth in Title 24 of the Uniform Building Code to minimize total consumption of energy.
- ▶ Applicants shall be required to comply with applicable mitigation measures in the South Coast AQMD's 2016 AQMP and all applicable South Coast AQMD rules and regulations.
- ▶ The developer shall comply with the provisions of South Coast AQMD Rule 1113 - Architectural Coatings, during the construction of all buildings and facilities. Application of architectural coatings shall be completed in a manner that poses the least emissions impacts whenever such application is deemed proficient.

6. AIR QUALITY AND GHG IMPACT ANALYSIS

6.1 Air Quality and Greenhouse Gas Significance Criteria

6.1.1 CEQA Guidelines

According to the CEQA 2019 Guidelines Appendix G Environmental Checklist Questions, a Project could have a potentially significant effect related to air quality if a project would:

- ▶ III-a) Conflict with or obstructs implementation of the applicable air quality plan;
- ▶ III-b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is designated non-attainment under a NAAQS and CAAQS (including emissions which exceed quantitative thresholds for O₃ precursors);
- ▶ III-c) Expose sensitive receptors to substantial pollutant concentrations; or
- ▶ III-d) Results in other emissions (such as those leading to odor) adversely affecting a substantial number of people.

Additionally, a Project could have a potentially significant effect related to GHGs if a project would:

- ▶ VIII-a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- ▶ VIII-b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

6.1.2 South Coast AQMD Thresholds of Significance

The City of Paramount, as the CEQA Lead Agency, applies the South Coast AQMD's thresholds of significance for air quality given it is responsible for managing this resource area for the region. The South Coast AQMD significance thresholds are designed to implement the general criteria for air quality emissions as required in the CEQA Guidelines, Appendix G, Paragraph III (Title 14 of the California Code of Regulations §15064.7) and CEQA (California Public Resources Code Sections 21000 et. al). South Coast AQMD's specific CEQA air quality thresholds for criteria air pollutants, TACs, and GHGs are presented in **Table 6-1**.

Table 6-1. South Coast AQMD Air Quality Thresholds of Significance

Mass Daily Thresholds ^a		
Pollutant	Construction ^b	Operation ^c
NOx	100 pounds per day (lbs/day)	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	

Mass Daily Thresholds ^a		
Pollutant	Construction ^b	Operation ^c
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT per year CO ₂ e for industrial facilities	
AAQS for Criteria Pollutants ^d		
NO ₂ 1-hour average annual arithmetic mean	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM ₁₀ 24-hour average annual average	10.4 µg/m ³ (construction) & 2.5 µg/m ³ (operation) 1.0 µg/m ³	
PM _{2.5} 24-hour average	10.4 µg/m ³ (construction) & 2.5 µg/m ³ (operation)	
SO ₂ 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 µg/m ³ (state)	
CO 1-hour average 8-hour average	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day average Rolling 3-month average	1.5 µg/m ³ (state) 0.15 µg/m ³ (federal)	
a. Source: South Coast AQMD CEQA Handbook (South Coast AQMD, 1993), Revision: March 2019. b. Construction thresholds apply to South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins). c. For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds. d. Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated. e. Ambient air quality threshold based on South Coast AQMD Rule 403.		
KEY:	lbs/day = pounds per day lb/hr = pounds per hour	ppm = parts per million MT/yr CO ₂ eq = metric tons per year of CO ₂ equivalents µg/m ³ = microgram per cubic meter ng/m ³ = nanogram per cubic meter
		≥ = greater than or equal to > = greater than

6.1.2.1 Thresholds for Ambient Air Quality Impacts

CEQA Guidelines – Appendix G (Environmental Checklist) states that a project that would “violate any air quality standard or contribute substantially to an existing or projected air quality violation” would be considered to create significant impacts on air quality. Therefore, an AQIA should determine whether the emissions from a project would cause or contribute significantly to violations of the NAAQS or CAAQS (presented above in **Table 6-1**) when added to existing ambient concentrations.

It is South Coast AQMD’s responsibility to ensure that the NAAQS and CAAQS are achieved and maintained in its geographical jurisdiction, the South Coast Air Basin. A pollutant’s attainment status in a given sub-region within the Basin dictates the significance determination for potential increases in ambient air pollution. If the sub-region is in attainment for a specific criteria pollutant, a project’s net contributions plus the measured background concentration of that pollutant cannot exceed the applicable CAAQS (or NAAQS). In sub-regions

that are in nonattainment for a specific criteria pollutant, a project's emissions increase cannot exceed the applicable South Coast AQMD air quality significance threshold.

The screening-level localized significance thresholds (LSTs) are the quantities of project-related emissions at which localized concentrations (ppm or $\mu\text{g}/\text{m}^3$) could exceed the relevant AAQS for criteria air pollutants for which the South Coast Air Basin is designated in nonattainment. The screening-level LSTs are based on the proposed project site size and distance to the nearest sensitive receptor. Additionally, the screening-level LSTs are based on the California AAQS, which are the most stringent AAQS, established to provide a margin of safety in the protection of the public health and welfare.

6.1.2.2 Thresholds for Hazardous Air Pollutants

Rule 1402 applies to facilities that are subject to the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588), and facilities with emissions that exceed significant or action risk levels. This rule reduces the health risk associated with emissions of TACs from existing sources by specifying limits for the MICR, cancer burden, and non-cancer acute and chronic HI, and requiring facilities to implement risk reduction plans to achieve these risk limits, as required by the Hot Spots Act and this rule. Rule 1402 requires preparation of an HRA to demonstrate compliance with specified limits.

In 1992, the California legislature added a risk reduction component called, the Facility Air Contaminant Risk Audit and Reduction Plan (or also known as SB 1731), which required South Coast AQMD Board of Directors to establish action risk levels and significant risk levels. **Table 6-1** above presents the thresholds of significance used when evaluating TACs.

6.1.2.3 Cumulative Impacts Threshold of Significance

A project impact that is individually limited may nonetheless contribute to a larger cumulative impact. A "cumulative impact" is defined as two or more impacts from related past, current, or probable future projects which, when considered together, are considerable.

A CEQA impact analysis must discuss cumulative impacts if a project impact makes a "cumulatively considerable" contribution to the larger cumulative impact. A project impact is "cumulatively considerable" if the impact is significant when viewed together with similar impacts from related projects. If a project's incremental contribution to a cumulative impact is not cumulatively considerable, however, the CEQA impact analysis need only briefly describe the basis for its conclusions.

A lead agency may find that a project's contribution to a cumulative impact is not cumulatively considerable if the project will comply with the requirements of a plan, regulation, or mitigation program and the plan or program (1) is adopted by an agency with jurisdiction over the affected resources, and (2) sets forth specific requirements that will avoid or substantially lessen the cumulative impact within the relevant geographic area.

The relevant geographic area for analysis of cumulative criteria pollutant air quality impacts herein is the South Coast Air Basin. The Basin is a designated air quality control region under the Federal CAA and a designated air quality basin under the California CAA. Compliance with both Acts is measured based on criteria pollutant concentrations throughout the Basin.

In lieu of a list of specific projects, the analysis of cumulative air quality impacts herein uses the summary of projections and conditions set forth in the 2022 AQMP and the Final Program Environmental Impact Report (EIR) for the 2022 AQMP prepared and certified by the South Coast AQMD.

The AQMP is an approved plan and mitigation program within the meaning of CEQA Guidelines Section 15064(h)(3). The AQMP was adopted by the South Coast AQMD through a public process, and the South Coast AQMD has jurisdiction over air quality throughout the Basin. The California Legislature has delegated to the South Coast AQMD the State's primary responsibility under the Act for achieving and maintaining the NAAQS within the Basin (HSC Code Sections 40001 and 40412). The AQMP, approved by the U.S. EPA and CARB under the federal and state CAAs, respectively, sets forth control measures designed to attain the NAAQS and CAAQS (HSC Section 40913). The South Coast AQMD implements the AQMP control measures through regulations known as "rules" and a permitting scheme (HSC Sections 40440, 40506, and 42300). The South Coast AQMD has established thresholds for individual projects and if the project emissions are below established thresholds, then the project is viewed as in compliance with the AQMP, and the project's cumulative impacts are found to be less than cumulatively considerable.

6.1.3 Proposed Project Analysis Result

South Coast AQMD has set significance levels for criteria pollutants as shown in **Table 6-1**. As further discussed in **Section 6.1.2** above, these thresholds are designed to implement the general criteria for air quality emissions. South Coast AQMD has established separate thresholds for construction (short-term) and operational (long-term) emissions.

6.1.3.1 Baseline Criteria Pollutant Emissions

As discussed previously, CEQA does not require an analysis of a proposed Project's existing (i.e., baseline or historical) operations. Instead, CEQA requires an analysis of how the proposed Project will incrementally change the existing environmental conditions. Nonetheless, baseline emissions have been quantified within this AQIA for disclosure purposes. Baseline emissions were calculated per the methods discussed previously in **Section 5.1**. **Table 6-2** presents the criteria pollutant emissions for Castle Metals' current operations compared to the operational (long-term) emissions thresholds.

Table 6-2. Current Operations Emissions

Emissions Source	Pollutant (pounds/day)					
	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Category						
Passenger Vehicles	0.01	0.06	1.23	0.00	0.00	0.00
Trucks	0.00	0.27	0.02	0.00	0.00	0.00
Forklifts	0.06	0.81	16.66	0.01	0.06	0.06
Dust Collector	-	-	-	-	0.16	0.16
Daily Emissions	0.08	1.14	17.91	0.02	0.23	0.23
South Coast AQMD Significance Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Source: Trinity Consultants 2026 Note: 0.00 could represent > 0.00						

6.1.3.2 Proposed Project Operations Emissions

The proposed Project is expected to have long-term air quality emissions from operations of the new chemical milling process. Emissions calculated as described in **Section 5.2.2** are shown in **Table 6-3** compared to the applicable operational emission thresholds.

Table 6-3. Project Operational Emissions

Emissions Source	Pollutant (pounds/day)					
	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Category						
Passenger Vehicles	0.00	0.01	0.12	0.00	0.00	0.00
Trucks	0.00	0.07	0.00	0.00	0.00	0.00
Boiler	0.04	0.69	0.00	0.58	0.05	0.00
Scrubber	-	3.65	-	-	-	-
Daily Emissions	0.04	4.41	0.13	0.58	0.05	0.00
South Coast AQMD Significance Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
<i>Source:</i> Trinity Consultants 2026 Note: 0.00 could represent > 0.00						

As shown in **Table 6-3**, operation-related emissions, calculated as described in **Section 5.2.2** (see Appendix B for detailed calculations), would be less than the South Coast AQMD significant threshold levels. Therefore, the proposed Project would have a *less than significant impact* during Project operations.

6.1.3.3 Potential Impacts from Carbon Monoxide

Ambient CO concentrations normally correspond closely to the spatial and temporal distributions of vehicular traffic. Relatively high concentrations of CO would be expected along heavily traveled roads and near busy intersections. CO concentrations are also influenced by wind speed and atmospheric mixing. CO concentrations may be more uniformly distributed when inversion conditions are prevalent in the valley. Under certain meteorological conditions, CO concentrations along a congested roadway or intersection may reach unhealthful levels for sensitive receptors (e.g., children, the elderly, hospital patients, etc.). This localized impact can result in elevated levels of CO, or “hotspots” even though concentrations at the closest air quality monitoring station may be below NAAQS and CAAQS.

The localized Project impacts depend on whether ambient CO levels in the Project vicinity would be above or below NAAQS. If ambient levels are below the standards, a project is considered to have significant impacts if a project’s emissions would exceed one or more of these standards. If ambient levels already exceed a state standard, a project’s emissions are considered significant if they would increase one-hour CO concentrations by 10 ppm or more or eight-hour CO concentrations by 0.45 ppm or more. Typical criteria by which CO “Hot Spot” modeling should be considered include:

1. A traffic study for the project indicates that the Level of Service (LOS) on one or more streets or at one or more intersections in the project vicinity would be reduced to LOS E or F; or
2. A traffic study indicates that the project would substantially worsen an already existing LOS F on one or more streets or at one or more intersections in the project vicinity.

Due to the location and traffic increase anticipated from this Project, impacted intersections and roadway segments are anticipated to operate at a LOS of C or better. Therefore, CO “Hotspot” Modeling was not conducted for this Project and no concentrated excessive CO emissions are expected to be caused once the proposed Project is completed.

6.1.3.4 Impacts to Ambient Air Quality

The screening-level localized significance thresholds (LSTs) are the amount of project-related emissions at which localized concentrations (ppm or $\mu\text{g}/\text{m}^3$) could exceed the AAQS for criteria air pollutants for which the South Coast Air Basin is designated nonattainment. The screening-level LSTs are based on the proposed Project site size and distance to the nearest sensitive receptor. Additionally, the screening-level LSTs are based on the California AAQS, which are the most stringent AAQS, established to provide a margin of safety in the protection of public health and welfare.

Table 6-4 shows the maximum daily emissions (pounds per day) generated during operation of the new chemical milling process compared with the South Coast AQMD's screening-level operational LSTs. The Project is in South Coast AQMD Source Receptor Area #5 (Southeast LA County); therefore, Source Receptor Area #5 allowable emissions are used in comparison with Project emissions. As shown in **Table 6-4**, maximum daily emissions associated with the Project would not exceed the South Coast AQMD screening-level LSTs. The analysis presented in this section is conservative since the South Coast AQMD LSTs apply to on-site emissions only. Please note that the entire facility is greater than 5 acres; however, the chemical milling process is less than 1 acre. The threshold levels in South Coast AQMD's screening-level LSTs for 1-acre and 5-acre areas are both shown for comparison in **Table 6-4**.

Table 6-4. Proposed Project Maximum Daily Onsite Operational Emissions

Emissions Source	Pollutant (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emission	4.41	0.13	0.05	0.00
LST for 1 Acres at 25 ft	80	571	1	1
LST for 5 Acres at 25 ft	172	1480	4	2
Threshold Exceeded?	NO	NO	NO	NO
Source: Trinity Consultants 2026				

Because the Project's estimated NO_x, CO, PM₁₀, and PM_{2.5} are below the South Coast AQMD's screening-level LSTs, the Project's contribution to potential violations of AAQS would be *less-than-significant*.

6.1.3.5 Proposed Impacts from Greenhouse Gas Emissions

Table 6-5 below presents the GHG emissions from baseline operations as well as the proposed Project, as discussed in **Section 5.2.3**.

Table 6-5. GHG Emissions

Source	Emissions (MT/year) ¹			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Baseline Emissions				
Passenger Vehicles	54.5	0.000	0.001	54.7
Trucks	46.7	0.000	0.007	48.6
Forklifts	34.4	-	-	34.4
Electricity Usage	132.8	0.013	0.002	133.6
Natural Gas Usage	0.3	0.000	0.000	0.3
Total Baseline Emissions	268.7	0.0	0.0	271.7
Project Emissions				

Source	Emissions (MT/year) ¹			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Passenger Vehicles	5.4	0.000	0.000	5.5
Trucks	11.7	0.000	0.002	12.2
Boiler	99.3	0.002	0.000	99.4
Electricity Usage	19.0	0.002	0.000	19.1
Natural Gas Usage	1.0	0.000	0.000	1.0
Total Operations Emissions	136.3	0.004	0.002	137.0
Note: 0.000 could represent > 0.000				

6.2 Analysis of Air Quality and GHG CEQA Environmental Checklist Questions

6.2.1 AQ-1: Conflict or Obstruction of Air Quality Plan

CEQA Guidelines Air Quality Environmental Checklist Question III-a) – Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Applicable South Coast AQMD Significance Criteria: presented in Table 6-1.

6.2.1.1 Consistency with the Air Quality Attainment Plan

Air quality impacts from proposed projects within City of Paramount are controlled through policies and provisions of the City of Paramount General Plan (City of Paramount 2025), South Coast AQMD's Final 2016 AQMP (South Coast AQMD 2017), South Coast AQMD's final 2022 AQMP (South Coast AQMD 2022b) and Southern California Association of Government's (SCAG's) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (SCAG, 2020). In order to demonstrate that a proposed Project would not cause further air quality degradation in either the South Coast AQMD's plan to improve air quality within the air basin, or the federal requirements to meet certain air quality compliance goals, each project should also demonstrate consistency with the South Coast AQMD's adopted Air Quality Attainment Plans (AQAP) for O₃ and PM₁₀. The South Coast AQMD is required to submit a "Rate of Progress" document to CARB that demonstrates past and planned progress toward reaching attainment for all criteria pollutants. The California Clean Air Act (CCAA) requires air pollution control districts with severe or extreme air quality problems to provide for a 5% reduction in non-attainment emissions per year. The AQAP prepared for the South Coast Air Basin by the South Coast AQMD complies with this requirement. CARB reviews, approves or amends the document and forwards the plan to the U.S. EPA for final review and approval within the SIP.

Air pollution sources associated with stationary sources are regulated through the permitting authority of the South Coast AQMD under Regulation II, List and Criteria Identifying Information Required of Applicants Seeking a Permit to Construct from the South Coast AQMD and related rules (Rule 201 through Rule 223). Owners of any new or modified equipment that emits, reduces, or controls air contaminants, except those specifically exempted by the South Coast AQMD, are required to apply for an Authority to Construct and Permit to Operate (South Coast AQMD Rule 201). Through this permitting mechanism which include compliance with applicable rules and regulations, the South Coast AQMD would ensure that all stationary sources within the project area would be subject to the standards of the South Coast AQMD to ensure that new developments do not result in net increases in stationary sources of criteria air pollutants.

State CEQA Guidelines and the Federal Clean Air Act (Sections 176 and 316) contain specific references on the need to evaluate consistencies between a proposed project and the applicable AQAP for the project site. To accomplish this, CARB has developed a three-step approach to determine project conformity with the applicable AQAP:

1. *Determination that an AQAP is being implemented in the area where the project is being proposed.* The South Coast AQMD has implemented the current, modified AQAP as approved by CARB.
2. *The proposed project must be consistent with the growth assumptions of the applicable AQAP.* The Project land use type is an existing metal processing operation and addition of a new chemical milling operation. The proposed operations would continue to fit under the existing land use, and the new chemical milling process will be within the existing building's footprint, resulting in no new exterior construction or land disturbance. Therefore, growth assumptions in the City of Paramount General Plan will not need to be modified with the approval of the proposed Project.
3. *The project must contain in its design all reasonably available and feasible air quality control measures.* The proposed Project incorporates various policy and rule-required project design features that will reduce related emissions.

The CCAA and AQAP identify transportation control measures as methods to further reduce emissions from mobile sources. Strategies identified to reduce vehicular emissions such as reductions in vehicle trips, vehicle use, vehicle miles traveled, vehicle idling, and traffic congestion, can be implemented as control measures under the CCAA in order to reduce vehicular emissions as well.

As the continuance of existing operations represented by the proposed Project, and any future growth that may or may not result, is already included in the City of Paramount General Plan and the AQAP, conclusions may be drawn from the following criteria:

1. That, by definition, the proposed emissions from the Project are below the South Coast AQMD's established emissions impact thresholds;
2. That the primary source of emissions from the Project will be metal processing operations and motor vehicles that are licensed through the State of California and whose emissions are already incorporated into CARB's South Coast Air Basin's Emissions Inventory.

Based on these factors, the proposed Project is *consistent with the AQAP*. Therefore, the Project would not obstruct implementation of applicable South Coast AQMD air quality plans and therefore be less than significant.

6.2.2 AQ-2: Cumulative Impacts

CEQA Guidelines Air Quality Environmental Checklist Question III-b) – Would the Project 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 AAQS?

Applicable South Coast AQMD Significance Criteria: presented in Table 6-1.

By its very nature, air pollution has a cumulative impact. South Coast AQMD's nonattainment status is a result of past and present development within the South Coast Air Basin. Furthermore, attainment of AAQS can be jeopardized by increasing emissions-generating activities in the region. No single project would be sufficient in size, by itself, to result in nonattainment of the regional air quality standards. Instead, a project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and

future development within the South Coast Air Basin. When assessing whether there is a new significant cumulative effect, the Lead Agency shall consider whether the incremental effects of the project are cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects [CCR §15064(h)(1)]. Per CEQA Guidelines §15064(h)(3) a Lead Agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program, including, but not limited to an air quality attainment or maintenance plan that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. The South Coast AQMD has established thresholds for individual projects and if the project emissions are below established thresholds, then the project is viewed as in compliance with the AQMP, and the project's cumulative impacts are found to be less than cumulatively considerable.

As discussed in **Section 6.1.3** and shown in **Table 6-3** above, the Project's estimated emissions are below established South Coast AQMD thresholds. Further, the cumulative baseline plus proposed Project emissions combined are below applicable South Coast AQMD's daily emissions thresholds. Please see **Section 6.2.3** below for a summary of health risks.

For these reasons, the Project's potential impacts would not be cumulatively considerable, and the potential cumulative impact would be less than significant.

6.2.3 AQ-3: Sensitive Receptors

CEQA Guidelines Air Quality Environmental Checklist Question III-c) – Would the Project expose receptors to substantial pollutant concentrations?

*Applicable South Coast AQMD Significance Criteria: presented in **Table 6-1**.*

6.2.3.1 Predicted Project-Related Health Risk Impacts

South Coast AQMD has set the level of significance for carcinogenic risk at ten in one million, which is understood as the possibility of causing ten additional cancer cases in a population of one million people. The level of significance for chronic and acute non-cancer risk is a hazard index of 1.0. All residential and sensitive receptors were modeled with a 30-year exposure duration for future Project operation, and all business receptors were modeled with a 25-year exposure for baseline and Project operation.

The cancer risk and the health hazard index (HI) for chronic non-cancer and acute risk at the point of maximum impact (PMI) do not exceed the significance levels of ten in one million (10×10^{-6}) and 1.0, respectively for the proposed Project. All other modeled receptors (residents, off-site workers, and sensitive receptors) have lower risk and therefore also do not exceed the significance levels. The PMI is identified by receptor location and risk and provided in **Table 6-6**. The electronic AERMOD and HARP2 output files are provided in Appendix C.

Table 6-6. Project Maximum Health Risk Impacts Predicted by HARP2

	Value	UTM East	UTM North
Excess Cancer Risk	0.004 in a million	391115.6	3752563.7
Chronic Hazard Index	0.004	391249.0	3752683.2
Acute Hazard Index	0.010	391241.5	3752664.0

As shown above in **Table 6-6**, the maximum predicted residential cancer risk for Project operations is 0.004 in a million for the PMI, which is below the applicable South Coast AQMD cancer risk threshold of greater than 10 in a million. Similarly, the maximum chronic non-cancer hazard index for Project operations is 0.004 and the maximum acute non-cancer hazard index is 0.010; both are well below the applicable HI threshold of 1.0. For these reasons the proposed Project would not have an adverse health effect to any of the surrounding communities.

In summary, the potential health risk attributable to the proposed Project is determined to be *less than significant* based on the following conclusions:

1. Potential carcinogenic risk from the proposed Project is below the significance level of ten in a million at each of the modeled receptors; and
2. The hazard index for the potential chronic non-cancer risk from the proposed Project is below the significance level of 1.0 at each of the modeled receptors.
3. The hazard index for the potential acute non-cancer risk from the proposed Project is below the significance level of 1.0 at each of the modeled receptors.

Therefore, potential risk to the population attributable to emissions of TACs from the proposed Project would be less than significant.

6.2.4 AQ-4: Other Emissions

CEQA Guidelines Air Quality Environmental Checklist Question III-d) – Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Applicable South Coast AQMD Significance Criteria: presented in Table 6-1.

The intensity of an odor source's operations and its proximity to sensitive receptors influences the potential significance of odor emissions. Castle Metals' operations are not anticipated to be odor sources. Additionally, Castle Metals has not had a history of adverse odor releases. In addition, South Coast AQMD Rule 402 acts to prevent occurrences of odor nuisances. Therefore, potential operational-source odor impacts would be considered less than significant.

6.2.5 GHG-1: GHG Emissions Analysis

CEQA Guidelines GHG Environmental Checklist Question VIII-a) – Would the proposed Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Applicable South Coast AQMD Significance Criteria: presented in Table 6-1.

CEQA Guidelines GHG Environmental Checklist Question VIII-b) – Would the proposed Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

Applicable South Coast AQMD Significance Criteria: presented in Table 6-1.

As discussed in **Sections 4.1.2** and **4.2.5**, Castle Metals is not subject to U.S. EPA's GHGRP and California's MRR for GHG reporting and is not anticipated to become subject as a result of the Project. As shown in Table 6-5, the proposed Project will increase Castle Metals' annual GHG emissions by approximately 137 MT CO₂e

per year. For context, South Coast AQMD does have a GHG project level threshold of significance which they apply to major industrial CEQA projects for which they are the CEQA lead agency. This is quantified at 10,000 MT CO_{2e} per year. The Project related emissions are substantially lower than South Coast AQMD's annual industrial GHG emissions threshold for CEQA.

6.2.5.1.1 6.2.5.1.1 State and Local Efforts to Reduce GHGs and Combat Global Warming

For the last two decades, as part of its efforts to reduce local air pollution, South Coast AQMD has promoted a number of programs to combat climate change. For instance, South Coast AQMD has promoted energy conservation, low-carbon fuel technologies (natural gas vehicles; electric-hybrids, hydraulic-hybrids, and battery-electric vehicles), renewable energy, vehicle miles traveled (VMT) reduction programs, and market incentive programs. South Coast AQMD adopted the Air Quality-Related Energy Policy, which integrates air quality, energy, and climate change issues in a coordinated and consolidated manner.

- ▶ Promote zero and near-zero emission technologies through ultra clean energy strategies, to meet air quality, energy security, and climate change objectives.
- ▶ Promote zero and near-zero emission technologies in both stationary and mobile applications to the extent feasible.
- ▶ Promote diversification of electricity generation technologies to provide reliable, feasible, affordable, sustainable, and zero or near-zero emission electricity supply for the Basin in partnership with local power producers.
- ▶ Promote demand side management programs to manage energy demand growth. Such programs include, but are not limited to, energy conservation, energy efficiency and load-shifting measures.
- ▶ Promote in-Basin distributed electricity generation, with emphasis on distributed renewable electricity generation, to reduce reliance on energy imports or central power plants, and to minimize the air quality, climate and cross-media environmental impacts of traditional power generation.
- ▶ Incorporate energy efficiency and conservation as an emissions reductions strategy for stationary and mobile sources through AQMD's planning, rule-making, advocacy, and CEQA commenting activities
- ▶ Promote electricity storage technology to improve the supply reliability, availability, and increased generation technology choices.

Additional reductions would be achieved through the regulatory process of the air district and CARB as required changes to diesel engines are implemented which would affect the product delivery trucks and limits on idling. The strategies currently being implemented by CARB may help in reducing the Project's GHG emissions and are summarized below.

Strategy	Description of Strategy
Vehicle Climate Change Standards	AB 1493 (Pavley) required the state to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of climate change emissions emitted by passenger vehicles and light duty trucks. Regulations were adopted by CARB in Sept. 2004.
Diesel Anti-Idling	In July 2004, CARB adopted a measure to limit diesel-fueled retail motor vehicle idling.
Other Light-Duty Vehicle Technology	New standards would be adopted to phase in beginning in the 2017 model year.
Alternative Fuels: Biodiesel Blends	CARB would develop regulations to require the use of 1% to 4% biodiesel displacement of California diesel fuel.
Alternative Fuels: Ethanol	Increased use of ethanol fuel.
Heavy-Duty Vehicle Emission Reduction Measures	Increased efficiency in the design of heavy-duty vehicles and an educational program for the heavy-duty vehicle sector.

Not all of these measures are currently appropriate or applicable to the proposed Project. While future legislation could further reduce the Project's GHG footprint, the analysis of this is speculative and in accordance with CEQA Guidelines Section 15145, will not be further evaluated in this AQIA. CEQA Guidelines Section 15130 notes that sometimes the only feasible mitigation for cumulative impacts may involve the adoption of ordinances or regulations rather than the imposition of conditions on a project-by-project basis. Global climate change is this type of issue. The causes and effects may not be just regional or statewide, they may also be worldwide. Given the uncertainties in identifying, let alone quantifying the impact of any single project on global warming and climate change, and the efforts made to reduce emissions of GHGs from the Project through design, in accordance with CEQA Section 15130, any further feasible emissions reductions would be accomplished through CARB regulations adopted pursuant to AB 32.

The analysis of GHG emissions is a different analysis than for criteria pollutants for the following reasons. For criteria pollutant, significance thresholds are based on daily emissions because attainment or non-attainment is primarily based on daily exceedances of applicable AAQS. Further, several AAQS are based on relatively short-term exposure effects to human health (one-hour and eight-hour standards), whereas the half-life of CO₂ is approximately 100 years, and as such the effects of GHGs occur over a longer timeframe than a single day. GHG emissions are typically considered to be cumulative impacts because they contribute to global climate change (versus local impacts). However, each project resulting in an emissions increase would contribute to the cumulative impact that emissions occurring planet-wide have on global climate change. Thus, determination of whether the Project contribution is cumulatively considerable is required to evaluate this impact.

There are many requirements for sources to reduce GHG emissions and most originate from the AB 32 Scoping Plan and associated programs administered by CARB. The Scoping Plan is the State's blueprint for how GHG reductions will be achieved. Local jurisdictions may have requirements as well, but the overall effort is centralized with CARB. Therefore, this impact evaluates whether the Project may conflict with the Scoping Plan (see **Section 3.7.4**). The South Coast AQMD Interim GHG Significance Threshold takes a tiered approach whereby Projects can screen-out by one of the following five methods: exemption from CEQA, GHG emissions already analyzed in GHG budgets from in approved regional plans, having emissions less than the 10,000 MT CO₂e/yr screening level, meeting best performance standards, or purchase GHG emissions offsets by funding projects or buying them outright. Projects with incremental increases less than this threshold screen out of further analysis and are not cumulatively considerable.

In the decade after South Coast AQMD adopted the Interim GHG Significance Threshold, several new laws and executive orders were adopted that require additional reductions in years after 2020. For instance, Senate Bill 32 (Lara, 2016) requires that GHG emissions be 40% less than 1990 levels by 2030. More drastic still, Senate Bill 100 (de Leon, 2018) which was signed by the Governor recently requires 100% zero-carbon electricity by 2045. On the day SB 100 was signed into law, the Governor also signed Executive Order B-55-18 which commits California to total, economy-wide carbon neutrality by 2045. Clearly, the 2008 Guidance may be somewhat inadequate in producing a meaningful comparison by today's standards which propose a grand vision that, if achieved, would fundamentally change how business is conducted and citizens live in the State. Thus, as discussed in the most recent updates to the Scoping Plan, objectives of the Scoping Plan affect entire sectors of the economy and it no longer makes sense to evaluate GHG emissions on a project-level.

For these reasons, Project GHG emissions levels presented in **Table 6-5** are primarily for disclosure purposes because impact analysis for the Project follows the approach certified by South Coast AQMD in the Final Negative Declaration for the Phillips 66 Los Angeles Refinery Carson Plant – Crude Oil Storage Capacity Project on December 12, 2014 (South Coast AQMD, 2014). The approach used by South Coast AQMD to assess GHG impacts from that project recognizes that consumers of electricity and transportation fuels are, in effect,

regulated by requiring providers and importers of electricity and fuel to participate in the GHG Cap-and-Invest Program and other Programs (e.g., low carbon fuel standard, renewable portfolio standard, etc.). Each such sector-wide program exists within the framework of AB 32 and its descendant laws the purpose of which is to achieve GHG emissions reductions consistent with the AB 32 Scoping Plan.

In summary, the Project would generate GHGs from electricity use, natural gas use, and combustion of gasoline/diesel fuels, each of which is regulated near the top of the supply-chain. As such, each citizen of California (including the operator of the Project) will have no choice but to purchase electricity and fuels produced in a way that is acceptable to the California market. Thus, Project GHG emissions will be consistent with the relevant plan (i.e., AB 32 Scoping Plan). The Project would meet its fair share of the cost to mitigate the cumulative impact of global climate change because Castle Metals is purchasing energy from the California market. Thus, the Project would have a less than significant impact on applicable GHG reduction plans.

Nonetheless, GHG emissions impacts from implementing the Project were calculated at the Project-specific level for construction and operations as explained in the previous paragraphs. Impact analysis for the Project follows the approach certified by South Coast AQMD in the Final Negative Declaration for the Phillips 66 Los Angeles Refinery Carson Plant – Crude Oil Storage Capacity Project on December 12, 2014 (South Coast AQMD, 2014). In summary, this approach takes into account the cumulative nature of the energy industry and recognizes that consumers of electricity and diesel fuel are in effect regulated by higher level emissions restrictions on the producers of these energy sources. Therefore, the Project's contribution to cumulative global climate change impacts would *not be cumulatively considerable*.

7. CONCLUSIONS

The Project will not have short-term air quality emissions due to construction activities.

The Project would result in long-term air quality emissions due to the new chemical milling process and associated mobile source emissions. These impacts *were found to be less than significant*.

The Project, in conjunction with other past, present, and foreseeable future projects, would result in cumulative long-term effects to air quality. The Project's incremental contribution to these impacts are below thresholds of significance and would not be considered cumulatively considerable. Therefore, the Project's contribution to cumulative impacts *were found to be less than significant*.

The Project, in conjunction with other past, present, and foreseeable future projects, would result in cumulative long-term impacts to global climate change. The Project's incremental contribution to these impacts will be less than the established GHG threshold of significance for industrial facilities and is considered *less than significant*.

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APPENDIX A. EXISTING AIR QUALITY MONITORING DATA



Top 4 Summary: **Highest 4 Daily Maximum Hourly Ozone Measurements**

at Compton-700 North Bullis Road



	2022		2023		2024	
	Date	Measurement	Date	Measurement	Date	Measurement
First High:	May 14	0.111	Nov 5	0.084	Sep 6	0.087
Second High:	Sep 3	0.087	Oct 7	0.083	Sep 5	0.083
Third High:	Sep 4	0.086	Aug 29	0.082	Oct 26	0.082
Fourth High:	Apr 6	0.079	Jul 25	0.080	Aug 20	0.081
California:						
# Days Above the Standard:		1		0		0
California Designation Value:		0.09		0.09		0.09
Expected Peak Day Concentration:		0.093		0.086		0.087
National:						
# Days Above the Standard:		0		0		0
3-Year Estimated Expected Number of Exceedance Days:		0.3		0.0		0.0
1-Year Estimated Expected Number of Exceedance Days:		0.0		0.0		0.0
Nat'l Standard Design Value:		0.102		0.085		0.086
Year Coverage:		99		95		90

Notes:

Hourly ozone measurements and related statistics are available at Compton-700 North Bullis Road between 2008 and 2024. Some years in this range may not be represented.

All concentrations expressed in parts per million.

The national 1-hour ozone standard was revoked in June 2005. Statistics related to the national 1-hour ozone standard are shown in or .

An exceedance of a standard is not necessarily related to a violation of the standard.

Year Coverage indicates the extent to which available monitoring data represent the time of the year when concentrations are expected to be highest. 0 means that data represent none of the high period; 100 means that data represent the entire high period. A high Year Coverage does not mean that there was sufficient data for annual statistics to be considered valid.

* means there was insufficient data available to determine the value.



Top 4 Summary: **Highest 4 Daily Maximum Hourly Ozone Measurements**

at Long Beach-Signal Hill



	2022		2023		2024	
	Date	Measurement	Date	Measurement	Date	Measurement
First High:	May 14	0.108	Oct 15	0.089	Sep 8	0.103
Second High:	Jun 20	0.073	Jul 25	0.079	Sep 7	0.086
Third High:	Sep 8	0.073	Aug 29	0.074	Sep 6	0.081
Fourth High:	Sep 4	0.072	Sep 8	0.074	Sep 5	0.077
California:						
# Days Above the Standard:		1		0		1
California Designation Value:		0.09		0.08		0.08
Expected Peak Day Concentration:		0.091		0.080		0.083
National:						
# Days Above the Standard:		0		0		0
3-Year Estimated Expected Number of Exceedance Days:		0.0		0.0		0.0
1-Year Estimated Expected Number of Exceedance Days:		0.0		0.0		0.0
Nat'l Standard Design Value:		0.096		0.079		0.086
Year Coverage:		96		96		91

Notes:

Hourly ozone measurements and related statistics are available at Long Beach-Signal Hill between 2020 and 2024. Some years in this range may not be represented.

All concentrations expressed in parts per million.

The national 1-hour ozone standard was revoked in June 2005. Statistics related to the national 1-hour ozone standard are shown in or .

An exceedance of a standard is not necessarily related to a violation of the standard.

Year Coverage indicates the extent to which available monitoring data represent the time of the year when concentrations are expected to be highest. 0 means that data represent none of the high period; 100 means that data represent the entire high period. A high Year Coverage does not mean that there was sufficient data for annual statistics to be considered valid.

* means there was insufficient data available to determine the value.



Top 4 Summary: Highest 4 Daily Maximum 8-Hour Ozone Averages

at Compton-700 North Bullis Road



2022			2023		2024	
	Date	8-Hr Average	Date	8-Hr Average	Date	8-Hr Average
National 2015 Std (0.070 ppm):						
First High:	May 14	0.085	Nov 5	0.071	Sep 2	0.064
Second High:	Sep 3	0.068	Apr 22	0.070	Aug 20	0.062
Third High:	Apr 6	0.064	Aug 29	0.070	Sep 6	0.062
Fourth High:	Sep 4	0.064	Oct 15	0.068	Oct 10	0.061
California Std (0.070 ppm):						
First High:	May 14	0.085	Aug 29	0.071	Sep 2	0.064
Second High:	Sep 3	0.068	Nov 5	0.071	Aug 20	0.063
Third High:	Apr 6	0.065	Apr 22	0.070	Sep 6	0.062
Fourth High:	Sep 4	0.065	Aug 28	0.068	Oct 11	0.062
National 2015 Std (0.070 ppm):						
# Days Above the Standard:		1		1		0
Nat'l Standard Design Value:		0.066		0.064		0.064
National Year Coverage:		100		98		91
California Std (0.070 ppm):						
# Days Above the Standard:		1		2		0
California Designation Value:		0.072		0.071		0.071
Expected Peak Day Concentration:		0.076		0.072		0.072
California Year Coverage:		96		94		90

Notes:

Eight-hour ozone averages and related statistics are available at Compton-700 North Bullis Road between 2008 and 2024. Some years in this range may not be represented.

All averages expressed in parts per million.

An exceedance of a standard is not necessarily related to a violation of the standard.

State and national statistics may differ for the following reasons:

National 8-hour averages are truncated to three decimal places; State 8-hour averages are rounded to three decimal places.

State criteria for ensuring that data are sufficiently complete for calculating 8-hour averages are more stringent than the national criteria.

Daily maximum 8-hour averages associated with the National 0.070 ppm standard exclude those 8-hour averages that have first hours between midnight and 6:00 am, Pacific Standard Time.

Daily maximum 8-hour averages associated with the National 0.070 ppm standard include only those 8-hour averages from days that have sufficient data for the day to be considered valid.

Year Coverage indicates the extent to which available monitoring data represent the time of the year when concentrations are expected to be highest. 0 means that data represent none of the high period; 100 means that data represent the entire high period. A high Year Coverage does not mean that there was sufficient data for annual statistics to be considered valid.

* means there was insufficient data available to determine the value.



Top 4 Summary: Highest 4 Daily Maximum 8-Hour Ozone Averages

at Long Beach-Signal Hill



	2022		2023		2024	
	Date	8-Hr Average	Date	8-Hr Average	Date	8-Hr Average
National 2015 Std (0.070 ppm):						
First High:	May 14	0.077	Apr 22	0.065	Sep 7	0.071
Second High:	Jun 20	0.059	Aug 29	0.064	Sep 8	0.068
Third High:	Apr 7	0.058	Oct 15	0.064	Sep 6	0.062
Fourth High:	Apr 8	0.058	Aug 28	0.063	Jun 23	0.060
California Std (0.070 ppm):						
First High:	May 14	0.077	Apr 22	0.065	Sep 7	0.071
Second High:	Apr 7	0.059	Oct 15	0.065	Sep 8	0.069
Third High:	Jun 20	0.059	Aug 29	0.064	Sep 6	0.063
Fourth High:	Apr 8	0.058	Aug 28	0.063	Jun 23	0.061
National 2015 Std (0.070 ppm):						
# Days Above the Standard:		1		0		1
Nat'l Standard Design Value:		0.063		0.060		0.060
National Year Coverage:		98		99		93
California Std (0.070 ppm):						
# Days Above the Standard:		1		0		1
California Designation Value:		0.072		0.065		0.065
Expected Peak Day Concentration:		0.072		0.066		0.066
California Year Coverage:		95		96		92

Notes:

Eight-hour ozone averages and related statistics are available at Long Beach-Signal Hill between 2020 and 2024. Some years in this range may not be represented.

All averages expressed in parts per million.

An exceedance of a standard is not necessarily related to a violation of the standard.

State and national statistics may differ for the following reasons:

National 8-hour averages are truncated to three decimal places; State 8-hour averages are rounded to three decimal places.

State criteria for ensuring that data are sufficiently complete for calculating 8-hour averages are more stringent than the national criteria.

Daily maximum 8-hour averages associated with the National 0.070 ppm standard exclude those 8-hour averages that have first hours between midnight and 6:00 am, Pacific Standard Time.

Daily maximum 8-hour averages associated with the National 0.070 ppm standard include only those 8-hour averages from days that have sufficient data for the day to be considered valid.

Year Coverage indicates the extent to which available monitoring data represent the time of the year when concentrations are expected to be highest. 0 means that data represent none of the high period; 100 means that data represent the entire high period. A high Year Coverage does not mean that there was sufficient data for annual statistics to be considered valid.

* means there was insufficient data available to determine the value.



Top 4 Summary: Highest 4 Daily 24-Hour PM2.5 Averages

at Compton-700 North Bullis Road



	2022		2023		2024	
	Date	24-Hr Average	Date	24-Hr Average	Date	24-Hr Average
National:						
First High:	Dec 24	52.8	Dec 25	54.6	Dec 31	57.4
Second High:	Jul 4	39.2	Dec 24	36.1	Dec 24	46.8
Third High:	Jan 1	37.1	Jul 4	31.7	Dec 5	44.9
Fourth High:	Nov 24	37.1	Dec 29	31.2	Jul 4	41.1
California:						
First High:	Dec 24	54.6	Dec 25	54.6	Dec 31	57.4
Second High:	Nov 24	42.2	Dec 24	36.1	Dec 24	46.8
Third High:	Jul 4	41.8	Jul 4	32.0	Dec 5	44.9
Fourth High:	Dec 25	40.8	Dec 29	31.2	Jul 4	43.9
National:						
'06 Estimated # Days > 24-Hr Std:	6.2		2.1		7.1	
'06 Measured # Days > 24-Hr Std:	6		2		7	
2006 24-Hr Std Design Value:	39		34		32	
2006 24-Hr Std 98th Percentile:	32.6		28.1		35.1	
2006 Annual Std Design Value:	13.4		12.2		11.9	
2006 Annual Average:	12.1		11.1		12.5	
2012 Annual Std Design Value:	13.4		12.2		11.9	
2012 Annual Average:	12.1		11.1		12.5	
2024 Annual Std Design Value:	13.4		12.2		11.9	
2024 Annual Average:	12.1		11.1		12.5	
California:						
Annual Std Designation Value:	15		14		13	
Annual Average:	14.0		12.3		12.7	
Year Coverage:	95		97		99	

Notes:

Daily PM2.5 averages and related statistics are available at Compton-700 North Bullis Road between 2008 and 2024. Some years in this range may not be represented.

All averages expressed in micrograms per cubic meter.

An exceedance of a standard is not necessarily related to a violation of the standard.

State statistics are based on California approved samplers, whereas national statistics are based on samplers using federal reference or equivalent methods. State and national statistics may therefore be based on different samplers.

Year Coverage indicates the extent to which available monitoring data represent the time of the year when concentrations are expected to be highest. 0 means that data represent none of the high period; 100 means that data represent the entire high period. A high Year Coverage does not mean that there was sufficient data for annual statistics to be considered valid.

* means there was insufficient data available to determine the value.



Top 4 Summary: Highest 4 Daily 24-Hour PM2.5 Averages

at Long Beach-Route 710 Near Road



	2022		2023		2024	
	Date	24-Hr Average	Date	24-Hr Average	Date	24-Hr Average
National:						
First High:	Dec 24	39.0	Dec 25	58.3	Dec 5	44.2
Second High:	Dec 23	33.5	Dec 29	30.2	Dec 31	40.5
Third High:	Dec 19	32.3	Dec 26	29.4	Dec 23	33.5
Fourth High:	Dec 22	29.2	Dec 24	28.2	Nov 10	32.6
California:						
First High:	Dec 24	41.7	Dec 25	58.5	Dec 5	44.2
Second High:	Dec 23	33.5	Jul 5	33.8	Dec 31	40.5
Third High:	Dec 19	33.2	Sep 22	30.9	Jan 1	36.7
Fourth High:	Jan 1	33.0	Dec 29	30.2	Nov 10	33.5
National:						
'06 Estimated # Days > 24-Hr Std:		1.0		1.0		2.0
'06 Measured # Days > 24-Hr Std:		1		1		2
2006 24-Hr Std Design Value:		34		29		26
2006 24-Hr Std 98th Percentile:		25.5		25.4		28.2
2006 Annual Std Design Value:		12.9		11.9		11.5
2006 Annual Average:		11.9		10.8		11.7
2012 Annual Std Design Value:		12.9		11.9		11.5
2012 Annual Average:		11.9		10.8		11.7
2024 Annual Std Design Value:		12.9		11.9		11.5
2024 Annual Average:		11.9		10.8		11.7
California:						
Annual Std Designation Value:		14		14		14
Annual Average:		11.9		14.4		12.6
Year Coverage:		100		100		100

Notes:

Daily PM2.5 averages and related statistics are available at Long Beach-Route 710 Near Road between 2015 and 2024. Some years in this range may not be represented.

All averages expressed in micrograms per cubic meter.

An exceedance of a standard is not necessarily related to a violation of the standard.

State statistics are based on California approved samplers, whereas national statistics are based on samplers using federal reference or equivalent methods. State and national statistics may therefore be based on different samplers.

Year Coverage indicates the extent to which available monitoring data represent the time of the year when concentrations are expected to be highest. 0 means that data represent none of the high period; 100 means that data represent the entire high period. A high Year Coverage does not mean that there was sufficient data for annual statistics to be considered valid.

* means there was insufficient data available to determine the value.



Top 4 Summary: Highest 4 Daily 24-Hour PM2.5 Averages

at Long Beach-Signal Hill



	2022		2023		2024	
	Date	24-Hr Average	Date	24-Hr Average	Date	24-Hr Average
National:						
First High:	Dec 24	26.7	Dec 25	31.0	Dec 31	43.8
Second High:	Dec 19	24.0	Sep 22	27.0	Dec 5	33.2
Third High:	Dec 23	20.8	Jul 4	25.0	Nov 10	27.3
Fourth High:	Dec 25	20.3	Jul 5	23.3	Jan 1	25.9
California:						
First High:	Dec 19	28.8	Dec 25	31.0	Dec 31	43.8
Second High:	Dec 24	26.7	Sep 22	27.0	Dec 5	33.2
Third High:	Dec 23	20.8	Dec 26	26.5	Dec 28	29.0
Fourth High:	Dec 25	20.3	Jul 4	25.0	Dec 20	28.3
National:						
'06 Estimated # Days > 24-Hr Std:		*		0.0		1.1
'06 Measured # Days > 24-Hr Std:		0		0		1
2006 24-Hr Std Design Value:		*		*		*
2006 24-Hr Std 98th Percentile:		*		22.3		24.9
2006 Annual Std Design Value:		*		*		*
2006 Annual Average:		*		9.5		9.2
2012 Annual Std Design Value:		*		*		*
2012 Annual Average:		*		9.5		9.2
2024 Annual Std Design Value:		*		*		*
2024 Annual Average:		*		9.5		9.2
California:						
Annual Std Designation Value:		*		10		11
Annual Average:		*		10.1		11.0
Year Coverage:		74		98		95

Notes:

Daily PM2.5 averages and related statistics are available at Long Beach-Signal Hill between 2022 and 2024.

Some years in this range may not be represented.

All averages expressed in micrograms per cubic meter.

An exceedance of a standard is not necessarily related to a violation of the standard.

State statistics are based on California approved samplers, whereas national statistics are based on samplers using federal reference or equivalent methods. State and national statistics may therefore be based on different samplers.

Year Coverage indicates the extent to which available monitoring data represent the time of the year when concentrations are expected to be highest. 0 means that data represent none of the high period; 100 means that data represent the entire high period. A high Year Coverage does not mean that there was sufficient data for annual statistics to be considered valid.

* means there was insufficient data available to determine the value.



Top 4 Summary: Highest 4 Daily 24-Hour PM10 Averages

at Long Beach-Signal Hill



	2022		2023		2024	
	Date	24-Hr Average	Date	24-Hr Average	Date	24-Hr Average
National:						
First High:	Jan 31	57.9	Oct 29	81.2	Mar 18	83.0
Second High:	Sep 9	53.0	Nov 20	74.3	Nov 6	81.3
Third High:	Feb 3	51.1	Apr 12	54.2	Dec 10	70.8
Fourth High:	Apr 12	50.1	Nov 9	49.8	Sep 9	60.0
California:						
First High:		*		*		*
Second High:		*		*		*
Third High:		*		*		*
Fourth High:		*		*		*
National:						
Estimated # Days > 24-Hr Std:		0.0		0.0		0.0
Measured # Days > 24-Hr Std:		0		0		0
3-Yr Avg Est # Days > 24-Hr Std:		*		*		0.0
Annual Average:		25.1		22.0		24.0
3-Year Average:		*		*		24
California:						
Estimated # Days > 24-Hr Std:		*		*		*
Measured # Days > 24-Hr Std:		*		*		*
Annual Average:		*		*		*
3-Year Maximum Annual Average:		*		*		*
Year Coverage:		0		0		0

Notes:

Daily PM10 averages and related statistics are available at Long Beach-Signal Hill between 2022 and 2024.

Some years in this range may not be represented.

All averages expressed in micrograms per cubic meter.

The national annual average PM10 standard was revoked in December 2006 and is no longer in effect.

Statistics related to the revoked standard are shown in *italics* or *italics*.

An exceedance of a standard is not necessarily related to a violation of the standard.

All values listed above represent midnight-to-midnight 24-hour averages and may be related to an exceptional event.

State and national statistics may differ for the following reasons:

State statistics are based on California approved samplers, whereas national statistics are based on samplers using federal reference or equivalent methods. State and national statistics may therefore be based on different samplers.

State statistics for 1998 and later are based on local conditions (except for sites in the South Coast Air Basin, where State statistics for 2002 and later are based on local conditions). National statistics are based on standard conditions.

State criteria for ensuring that data are sufficiently complete for calculating valid annual averages are more stringent than the national criteria.

Measurements are usually collected every six days. Measured days counts the days that a measurement was greater than the level of the standard; Estimated days mathematically estimates how many days concentrations would have been greater than the level of the standard had each day been monitored.

3-Year statistics represent the listed year and the 2 years before the listed year.

Year Coverage indicates the extent to which available monitoring data represent the time of the year when concentrations are expected to be highest. 0 means that data represent none of the high period; 100 means

that data represent the entire high period. A high Year Coverage does not mean that there was sufficient data for annual statistics to be considered valid.

* means there was insufficient data available to determine the value.



Top 4 Summary: Highest 4 Daily 24-Hour PM10 Averages

at Long Beach-2425 Webster Street



	2022		2023		2024	
	Date	24-Hr Average	Date	24-Hr Average	Date	24-Hr Average
National:						
First High:	Mar 5	128.6	Feb 21	148.6	Nov 15	115.8
Second High:	Apr 12	92.6	Feb 22	90.9	Dec 10	108.3
Third High:	Feb 22	89.2	Feb 14	89.8	Sep 9	108.1
Fourth High:	Feb 3	83.0	Nov 20	87.4	Nov 6	90.2
California:						
First High:		*		*		*
Second High:		*		*		*
Third High:		*		*		*
Fourth High:		*		*		*
National:						
Estimated # Days > 24-Hr Std:		0.0		0.0		0.0
Measured # Days > 24-Hr Std:		0		0		0
3-Yr Avg Est # Days > 24-Hr Std:		*		*		0.0
Annual Average:		34.9		33.9		32.9
3-Year Average:		*		*		34
California:						
Estimated # Days > 24-Hr Std:		*		*		*
Measured # Days > 24-Hr Std:		*		*		*
Annual Average:		*		*		*
3-Year Maximum Annual Average:		*		*		*
Year Coverage:		0		0		0

Notes:

Daily PM10 averages and related statistics are available at Long Beach-2425 Webster Street between 2014 and 2024. Some years in this range may not be represented.

All averages expressed in micrograms per cubic meter.

The national annual average PM10 standard was revoked in December 2006 and is no longer in effect.

Statistics related to the revoked standard are shown in *italics* or *italics*.

An exceedance of a standard is not necessarily related to a violation of the standard.

All values listed above represent midnight-to-midnight 24-hour averages and may be related to an exceptional event.

State and national statistics may differ for the following reasons:

State statistics are based on California approved samplers, whereas national statistics are based on samplers using federal reference or equivalent methods. State and national statistics may therefore be based on different samplers.

State statistics for 1998 and later are based on local conditions (except for sites in the South Coast Air Basin, where State statistics for 2002 and later are based on local conditions). National statistics are based on standard conditions.

State criteria for ensuring that data are sufficiently complete for calculating valid annual averages are more stringent than the national criteria.

Measurements are usually collected every six days. Measured days counts the days that a measurement was greater than the level of the standard; Estimated days mathematically estimates how many days concentrations would have been greater than the level of the standard had each day been monitored.

3-Year statistics represent the listed year and the 2 years before the listed year.

Year Coverage indicates the extent to which available monitoring data represent the time of the year when concentrations are expected to be highest. 0 means that data represent none of the high period; 100 means

that data represent the entire high period. A high Year Coverage does not mean that there was sufficient data for annual statistics to be considered valid.

* means there was insufficient data available to determine the value.



Top 4 Summary: Highest 4 Daily Maximum Hourly Nitrogen Dioxide Measurements

at Compton-700 North Bullis Road

ADAM

	2022		2023		2024	
	Date	Measurement	Date	Measurement	Date	Measurement
National:						
First High:	Jan 14	64.9	Nov 2	53.4	Dec 18	60.7
Second High:	Mar 2	61.7	Nov 3	52.2	Oct 23	59.6
Third High:	Jan 13	58.0	Oct 31	51.8	Nov 21	54.7
Fourth High:	Jan 6	57.7	Dec 15	50.2	Dec 6	54.2
California:						
First High:	Jan 14	64	Nov 2	53	Dec 18	60
Second High:	Mar 2	61	Nov 3	52	Oct 23	59
Third High:	Jan 13	58	Oct 31	51	Nov 21	54
Fourth High:	Jan 6	57	Dec 15	50	Dec 6	54
National:						
1-Hour Standard Design Value:		57		53		52
1-Hour Standard 98th Percentile:		55.0		48.4		51.9
# Days Above the Standard:		0		0		0
Annual Standard Design Value:		14		13		13
California:						
1-Hour Std Designation Value:		70		60		60
Expected Peak Day Concentration:		70		64		60
# Days Above the Standard:		0		0		0
Annual Std Designation Value:		14		14		14
Annual Average:		14		12		12
Year Coverage:		99		96		98

Notes:

Hourly nitrogen dioxide measurements and related statistics are available at Compton-700 North Bullis Road between 2008 and 2024. Some years in this range may not be represented.

All concentrations expressed in parts per billion.

An exceedance of a standard is not necessarily related to a violation of the standard.

Year Coverage indicates the extent to which available monitoring data represent the time of the year when concentrations are expected to be highest. 0 means that data represent none of the high period; 100 means that data represent the entire high period. A high Year Coverage does not mean that there was sufficient data for annual statistics to be considered valid.

* means there was insufficient data available to determine the value.



Top 4 Summary: Highest 4 Daily Maximum Hourly Nitrogen Dioxide Measurements

at Long Beach-Route 710 Near Road



	2022		2023		2024	
	Date	Measurement	Date	Measurement	Date	Measurement
National:						
First High:	Feb 9	95.0	Oct 6	71.0	Oct 23	75.6
Second High:	Jan 14	90.2	Nov 3	70.1	Dec 10	75.0
Third High:	Mar 1	86.5	Feb 9	68.5	Sep 9	69.4
Fourth High:	Feb 7	80.3	Nov 2	67.8	Oct 22	69.0
California:						
First High:	Feb 9	95	Oct 6	71	Oct 23	75
Second High:	Jan 14	90	Nov 3	70	Dec 10	75
Third High:	Mar 1	86	Feb 9	68	Sep 9	69
Fourth High:	Feb 7	80	Nov 2	67	Oct 22	69
National:						
1-Hour Standard Design Value:		79		71		67
1-Hour Standard 98th Percentile:		76.0		61.1		62.6
# Days Above the Standard:		0		0		0
Annual Standard Design Value:		25		21		21
California:						
1-Hour Std Designation Value:		100		90		90
Expected Peak Day Concentration:		97		90		85
# Days Above the Standard:		0		0		0
Annual Std Designation Value:		25		25		25
Annual Average:		25		21		20
Year Coverage:		99		98		98

Notes:

Hourly nitrogen dioxide measurements and related statistics are available at Long Beach-Route 710 Near Road between 2015 and 2024. Some years in this range may not be represented.

All concentrations expressed in parts per billion.

An exceedance of a standard is not necessarily related to a violation of the standard.

Year Coverage indicates the extent to which available monitoring data represent the time of the year when concentrations are expected to be highest. 0 means that data represent none of the high period; 100 means that data represent the entire high period. A high Year Coverage does not mean that there was sufficient data for annual statistics to be considered valid.

* means there was insufficient data available to determine the value.



Top 4 Summary: Highest 4 Daily Maximum Hourly Nitrogen Dioxide Measurements

at Long Beach-Signal Hill



	2022		2023		2024	
	Date	Measurement	Date	Measurement	Date	Measurement
National:						
First High:	Mar 1	58.1	Nov 3	56.2	Dec 10	55.4
Second High:	Feb 28	55.4	Dec 14	50.3	Oct 22	53.4
Third High:	Jan 14	53.3	Jan 25	48.4	Dec 18	53.2
Fourth High:	Jan 13	53.0	Dec 18	47.7	Nov 14	50.1
California:						
First High:	Mar 1	58	Nov 3	56	Dec 10	55
Second High:	Feb 28	55	Dec 14	50	Oct 22	53
Third High:	Jan 13	53	Jan 25	48	Dec 18	53
Fourth High:	Jan 14	53	Dec 4	47	Nov 14	50
National:						
1-Hour Standard Design Value:		53		50		47
1-Hour Standard 98th Percentile:		47.5		46.7		46.6
# Days Above the Standard:		0		0		0
Annual Standard Design Value:		13		11		11
California:						
1-Hour Std Designation Value:		70		60		60
Expected Peak Day Concentration:		67		60		56
# Days Above the Standard:		0		0		0
Annual Std Designation Value:		12		12		12
Annual Average:		12		11		10
Year Coverage:		97		96		99

Notes:

Hourly nitrogen dioxide measurements and related statistics are available at Long Beach-Signal Hill between 2020 and 2024. Some years in this range may not be represented.

All concentrations expressed in parts per billion.

An exceedance of a standard is not necessarily related to a violation of the standard.

Year Coverage indicates the extent to which available monitoring data represent the time of the year when concentrations are expected to be highest. 0 means that data represent none of the high period; 100 means that data represent the entire high period. A high Year Coverage does not mean that there was sufficient data for annual statistics to be considered valid.

* means there was insufficient data available to determine the value.

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nanograms per cubic meter

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Year	Months Present	Minimum	Median	Mean	90th Percentile	Maximum	Standard Deviation	Number of Observations	Detection Limit	Estimated Risk
2025		0.65	4.9	*	6.5	7.3	2.32	12	1.3	*
2024		0.7	5.2	5.17	8.4	9.8	2.40	29	0.29	0.2
2023		2.7	5.5	*	9.6	10.5	2.47	24	1.3	*
2022		0.65	5.1	6.04	9.5	11.2	2.66	27	1.3	0.2
2021		2.0	7.0	*	10	16.3	3.42	22	1.3	*
2020		2.4	*	*	*	8.6	2.09	7	1.3	*
2019		0.65	7.2	*	11.2	20.5	4.41	29	1.3	*
2018		3.0	6.8	7.89	11.4	26.4	4.65	28	1.3	0.3
2017		1.4	6.4	*	11.6	20.2	4.04	27	1.3	*
2016		1.7	5.6	7.15	15.7	24.9	5.69	31	1.3	0.2
2015		0.65	4.5	5.41	8.2	19.3	3.50	30	1.3	0.2
2014		0.85	5.9	6.73	10.4	25	4.96	29	1.7	0.2
2013		1.7	5.9	*	10.7	19	4.06	24	1.0	*
2012		2.6	8.1	*	11.2	30	5.71	20	1.5	*
2011		3.3	10.1	*	14.9	15	3.93	12	1.5	*
2010		3.3	7.8	*	130	220	69.2	12	1.5	*
2009		0.75	10	12.2	23	32	7.00	30	1.5	0.4
2008		*	*	*	*	*	*	0	*	*
2007		3.9	12	*	26.5	43	10.1	18	1.5	*
2006		*	*	*	*	*	*	0	*	*
2005		*	*	*	*	*	*	0	*	*
2004		*	*	*	*	*	*	0	*	*
2003		7.0	*	*	*	34	9.88	5	3.0	*
2002		7.0	19	22.2	35.4	48	10.3	29	3.0	0.8
2001		2	19	*	32.8	48	11.4	22	4.0	*
2000		2	18	18.5	30	52	11.6	31	4.0	0.6
1999		5.0	20	31.1	33	570	101	30	4.0	1
1998		2	19	*	30.5	45	9.97	26	4.0	*
1997		2	22	*	43.2	59	15.0	17	4.0	*
1996		5.0	32	35.3	66.2	97	22.3	29	4.0	1
1995		2	29	34.3	64	77	21.2	28	4.0	1
1994		2	38.5	55.5	93.7	310	59.8	28	4.0	2
1993		14	36	*	83.4	250	48.8	23	4.0	*
1992		2	59	*	120	170	39.5	21	4.0	*
1991		17	68.5	80.5	140	190	44.1	28	4.0	3
1990		23	67	*	120	170	37.4	28	1.0	*
1989		*	*	*	*	*	*	0	*	*

Graph It!

Notes: Values below the Limit of Detection (LoD) assumed to be ½ LoD.
Means and risks shown only for years with data in all 12 months.
"*" means there was insufficient or no data available to determine the value.



APPENDIX B. PROJECT EMISSIONS

Baseline Emissions - Criteria Pollutants

Source	Emissions (lbs/day)						Emissions (tons/year)					
	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Passenger Vehicles	0.01	0.06	1.23	0.00	0.00	0.00	0.00	0.01	0.16	0.001	0.00	0.00
Trucks	0.00	0.27	0.02	0.00	0.00	0.00	0.00	0.04	0.00	0.000	0.00	0.00
Forklifts	0.06	0.81	16.66	0.01	0.06	0.06	0.01	0.11	2.17	0.001	0.01	0.01
Dust Collector					0.16	0.16					0.02	0.02
Total	0.08	1.14	17.91	0.02	0.23	0.23	0.01	0.15	2.33	0.002	0.03	0.03

Project Emissions - Criteria Pollutants

Source	Emissions (lbs/day)						Emissions (tons/year)					
	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Passenger Vehicles	0.00	0.01	0.12	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.00
Trucks	0.00	0.07	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00
Boiler	0.04	0.69	0.00	0.58	0.05	0.00	0.00	0.09	0.00	0.07	0.01	0.00
Scrubber		3.65						0.48				
Total	0.04	4.41	0.13	0.58	0.05	0.001	0.01	0.57	0.02	0.075	0.01	0.00

Baseline Emissions - GHGs

Source	Emissions (MT/Year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Passenger Vehicles	54.5	0.000	0.001	54.7
Trucks	46.7	0.000	0.007	48.6
Forklifts	34.4	-	-	34.4
Electricity Usage	132.8	0.013	0.002	133.6
Natural Gas Usage	0.3	0.000	0.000	0.3
Total	268.7	0.0	0.0	271.7

Project Emissions - GHGs

Source	Emissions (MT/Year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Passenger Vehicles	5.4	0.000	0.000	5.5
Trucks	11.7	0.000	0.002	12.2
Boiler	99.3	0.002	0.000	99.4
Electricity Usage	19.0	0.002	0.000	19.1
Natural Gas Usage	1.0	0.000	0.000	1.0
Total	136.3	0.004	0.002	137.0

Total Baseline On-Road Mobile Criteria Pollutant Emissions

Category	Emissions (lbs/day)						Emissions (tons/year)					
	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Passenger Vehicles	0.01	0.06	1.23	0.005	0.002	0.002	0.00	0.01	0.16	5.94E-04	0.000	0.000
Trucks	0.00	0.27	0.02	0.004	0.004	0.003	0.00	0.04	0.00	4.87E-04	4.61E-04	4.41E-04
Total	0.02	0.33	1.25	0.01	0.01	0.01	0.00	0.04	0.16	1.08E-03	0.001	0.001

Total Baseline On-Road Mobile GHG Emissions

Category	Emissions (MT/Year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Passenger Vehicles	54.5	0.000	0.001	54.7
Trucks	46.7	0.000	0.007	48.6
Total	101.2	0.000	0.008	103.4

Passenger Vehicle Emissions

employee trips/day	30	existing facility employees
days/week	5	Mon-Fri operating schedule
trips/year	7,800	trips/day * days/week * 52 weeks/year
trip distance (mi)	12.62	average employee trip distance, based on CalEEMod Appendix G, Table G-15.
total miles traveled per day (mi)	757.2	trips/day * trip distance * 2 (round trip)
total miles traveled per year (mi)	196,872	trips/year * trip distance * 2 (round trip)

	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}	CO ₂	CH ₄	N ₂ O	CO ₂ e ²
EF (grams/mile) ¹	0.0090	0.0365	0.7397	0.0027	0.0014	0.0013	276.8290	0.0024	0.0043	
lbs/mile	1.97E-05	8.04E-05	1.63E-03	6.03E-06	3.17E-06	2.91E-06				
lbs/day	0.01	0.06	1.23	0.00	0.00	0.00				
lbs/year	3.88	15.83	321.06	1.19	0.62	0.57				
tons/year	0.002	0.008	0.161	0.001	0.000	0.000				
MT/year							54.50	0.000	0.001	54.74

1. Average of EMFAC2021 emission factors for LDA/LDT1/LDT2 vehicle types, gasoline fueled.

2. CO₂e calculated based on GWP from 40 CFR Part 98, Subpart A, Table A-1, effective January 1, 2025.

Truck Emissions

truck trips/day	8	existing truck trips
days/week	5	Mon-Fri operating schedule
trips/year	2,080	trips/day * days/week * 52 weeks/year
trip distance (mi)	7.09	average truck trip distance, based on CalEEMod Appendix G, Table G-15.
total miles traveled per day (mi)	113.44	trips/day * trip distance * 2 (round trip)
total miles traveled per year (mi)	29,494	trips/year * trip distance * 2 (round trip)

	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}	CO ₂	CH ₄	N ₂ O	CO ₂ e ²
EF (grams/mile) ¹	0.0107	1.0914	0.0658	0.0150	0.0142	0.0136	1582.2276	0.0005	0.2493	
lbs/mile	2.35E-05	2.41E-03	1.45E-04	3.30E-05	3.13E-05	2.99E-05				
lbs/day	0.003	0.273	0.016	0.004	0.004	0.003				
lbs/year	0.69	70.96	4.28	0.97	0.92	0.88				
tons/year	0.000	0.035	0.002	0.000	0.000	0.000				
MT/year							46.67	0.000	0.007	48.62

1. Average of EMFAC2021 emission factors for T7 Single Other Class 8 vehicles, diesel fueled.

2. CO₂e calculated based on GWP from 40 CFR Part 98, Subpart A, Table A-1, effective January 1, 2025.

Castle Metals AQIA

Forklift Parameters

Count ¹	Hours/Day ²	Days/Week ²	Weeks/Year ²	Maximum Operating Hours/Year
10	8	5	52	2080

1. Castle currently has 2 side loaders and 8 forklifts that are powered by propane. Other equipment are all electric.
2. Castle's current operating schedule.

Forklift Emission Factors (lb/hr)¹

VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}	CO ₂
0.007	0.101	2.082	0.001	0.008	0.008	36.481

1. Forklift emission factors are retrieved from CARB's OFFROAD database. Emissions data is for the 2026 calendar year, large spark ignition forklifts, aggregate model year, aggregated horsepower, and propane fuel. Emission factors are calculated by utilizing the tons per day of each pollutant, converting to pounds, multiplying by 365 days per year, then dividing by the total activity in hours/year.

Forklift Maximum Criteria Pollutant Emissions

Category	VOC	NOx	CO	SOx	PM10	PM2.5
Daily Emissions (lb/day)	0.06	0.81	16.66	0.01	0.06	0.06
Annual Emissions (lb/year)	15.30	210.59	4330.44	2.82	16.41	15.92
Annual Emissions (ton/year)	0.01	0.11	2.17	0.00	0.01	0.01

Forklift Maximum GHG Emissions

CO ₂ Annual Emissions (MT/year)
34.418

Castle Metals AQIA

Dust Collector PM2.5 Emissions¹

Grain Loading ² (gr/dscf)	Conversion Factor (gr/lb)	Flow Rate ³ (dscfm)	Control Efficiency	Uncontrolled Emissions (lb/day)	Controlled Emissions (lb/day)	Uncontrolled ⁵ Emissions (tons/year)	Controlled ⁵ Emissions (tons/year)
7.43	7000	24000	99.99870%	12228	0.16	1590	0.02

1. Test data only provided for PM2.5. Assuming all PM2.5 = PM10.

2. PM2.5 grain loading per test data efficiency curve.

3. Flow rate per dust collector spec plate.

4. Daily emissions calculated based on operating schedule of 8 hours/day.

5. Annual emissions calculated as Potential to Emit (PTE), which is based on 8 hours/day, 5 days/week (facility operating hours are 7am-3pm, M-F).

6. Dust collector is currently controlling an aluminum process. Conservatively assuming all emissions from the dust collector are aluminum metal.

Total Utility GHG Emissions

Category	Annual Emissions (MT/year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e ¹
Electricity	132.84	0.01	0.002	133.61
Natural Gas	0.32	0.00	0.000	0.32
Total	133.16	0.01	0.002	133.92

1. Based on the following global warming potentials as listed in CARB's MRR.

CO ₂	1
CH ₄	25
N ₂ O	298

Electricity Emission Factors

Emission Factors (lb/MWh) ¹		
CO ₂	CH ₄	N ₂ O
348.637	0.033	0.004

1. Electricity emission factors for Southern California Edison from CalEEMod Appendix G, Table G-3.

Annual Emissions Associated with Electricity Usage

Annual Usage ¹ (MWh)	Annual Emissions (MT/year)		
	CO ₂	CH ₄	N ₂ O
840	132.84	0.013	0.002

1. Electricity usage pre-project is about 10,000 kWh per month less than post-project.

Natural Gas Emission Factors

Emission Factors (lb/MMBtu) ¹		
CO ₂	CH ₄	N ₂ O
116.977	0.0104	0.0002

1. Natural gas emission factors from CalEEMod Appendix G, Table G-4.

Annual Emissions Associated with Natural Gas Usage

Annual Usage ¹ (MMBtu)	Annual Emissions (MT/year)		
	CO ₂	CH ₄	N ₂ O
6	0.32	2.82E-05	5.99E-07

1. Natural gas usage pre-project is about 15 therms less than post-project. Conversion based on 1 therm = 0.1 MMBtu.

Total Project On-Road Mobile Criteria Pollutant Emissions

Category	Emissions (lbs/day)						Emissions (tons/year)					
	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Passenger Vehicles	0.00	0.01	0.12	0.0005	0.000	0.0002	0.00	0.00	0.02	5.94E-05	3.12E-05	2.87E-05
Trucks	0.00	0.07	0.00	0.0009	0.001	0.001	0.00	0.01	0.00	1.22E-04	1.15E-04	1.10E-04
Total	0.00	0.07	0.13	0.0014	0.001	0.001	0.00	0.01	0.02	1.81E-04	1.46E-04	1.39E-04

Total Project On-Road Mobile GHG Emissions

Category	Emissions (MT/Year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Passenger Vehicles	5.4	0.0000	0.0001	5.5
Trucks	11.7	0.0000	0.0018	12.2
Total	17.1	0.0001	0.002	17.6

Passenger Vehicle Emissions

employee trips/day	3	additional employees
days/week	5	Mon-Fri operating schedule
trips/year	780	trips/day * days/week * 52 weeks/year
trip distance (mi)	12.62	average employee trip distance, based on CalEEMod Appendix G, Table G-15.
total miles traveled per day (mi)	75.72	trips/day * trip distance * 2 (round trip)
total miles traveled per year (mi)	19,687	trips/year * trip distance * 2 (round trip)

	VOC	NOx	CO	SOX	PM10	PM2.5	CO2	CH4	N2O	CO2e ²
EF (grams/mile) ¹	0.0090	0.0365	0.7397	0.0027	0.0014	0.0013	276.8290	0.0024	0.0043	
lbs/mile	1.97E-05	8.04E-05	1.63E-03	6.03E-06	3.17E-06	2.91E-06				
lbs/day	0.00	0.01	0.12	0.00	0.00	0.00				
lbs/year	0.39	1.58	32.11	0.12	0.06	0.06				
tons/year	0.000	0.001	0.016	0.000	0.000	0.000				
MT/year							5.45	0.000	0.000	5.47

1. Average of EMFAC2021 emission factors for LDA/LDT1/LDT2 vehicle types, gasoline fueled.

2. CO2e calculated based on GWP from 40 CFR Part 98, Subpart A, Table A-1, effective January 1, 2025.

Truck Emissions

truck trips/day	2	additional truck trips
days/week	5	Mon-Fri operating schedule
trips/year	520	trips/day * days/week * 52 weeks/year
trip distance (mi)	7.09	average truck trip distance, based on CalEEMod Appendix G, Table G-15.
total miles traveled per day (mi)	28.36	trips/day * trip distance * 2 (round trip)
total miles traveled per year (mi)	7,374	trips/year * trip distance * 2 (round trip)

	VOC	NOx	CO	SOX	PM10	PM2.5	CO2	CH4	N2O	CO2e ²
EF (grams/mile) ¹	0.0107	1.0914	0.0658	0.0150	0.0142	0.0136	1582.2276	0.0005	0.2493	
lbs/mile	2.35E-05	2.41E-03	1.45E-04	3.30E-05	3.13E-05	2.99E-05				
lbs/day	0.001	0.068	0.004	0.001	0.001	0.001				
lbs/year	0.17	17.74	1.07	0.24	0.23	0.22				
tons/year	0.000	0.009	0.001	0.000	0.000	0.000				
MT/year							11.67	0.000	0.002	12.15

1. Average of EMFAC2025 emission factors for T7 Single Other Class 8 vehicles, diesel fueled.

2. CO2e calculated based on GWP from 40 CFR Part 98, Subpart A, Table A-1, effective January 1, 2025.

Boiler Emissions

Boiler Parameters

MMBtu/hr	Maximum ¹ Operating Hours per Day	Maximum Fuel ² Usage (MMBtu/year)	Maximum Fuel ³ Usage (MMscf/year)
0.9	8	1872	1.78

1. Based on the facility's daily operating schedule.

2. Based on the facility's schedule of 5 days/week, 52 weeks/year.

3. MMBtu converted to MMScf assuming 1050 btu/scf.

Boiler Emission Factors - Criteria Pollutants (lb/MMscf)¹

VOC	NOx	SOx	CO	PM
5.5	100	0.6	84	7.6

1. SCAQMD Combustion Default Emission Factors, Criteria Pollutant Emission Factors for Natural Gas Boilers.

Boiler Emissions - Criteria Pollutants

	VOC	NOx	SOx	CO	PM
Daily Emissions (lb/day)	0.04	0.69	0.004	0.58	0.05
Annual Emissions (lb/year)	9.8	178.3	1.1	149.8	13.5
Annual Emissions (ton/year)	0.005	0.09	0.001	0.07	0.01

Boiler Emission Factors - Toxics (lb/MMscf)¹

CAS	Pollutant	Emission Factor
71432	Benzene	0.008
50000	Formaldehyde	0.017
1151	PAHs	0.0001
81203	Naphthalene	0.0003
75070	Acetaldehyde	0.0043
107028	Acrolein	0.0027
7664417	Ammonia	3.2
100414	Ethyl benzene	0.0095
110543	Hexane	0.0063
115071	Propylene	0.731
108883	Toluene	0.0366
1330207	Xylene	0.0272

1. SCAQMD Combustion Default Emission Factors, TAC Emission Factors for External Combustion Equipment with equipment rating <10 MMBtu/hr.

Boiler Emissions - Toxics

CAS	Pollutant	Hourly Emissions (lb/hr)	Annual Emissions (lb/year)
71432	Benzene	6.86E-06	0.01
50000	Formaldehyde	1.46E-05	0.03
1151	PAHs	8.57E-08	0.00
91203	Naphthalene	2.57E-07	0.00
75070	Acetaldehyde	3.69E-06	0.01
107028	Acrolein	2.31E-06	0.00
7664417	Ammonia	2.74E-03	5.71
100414	Ethyl benzene	8.14E-06	0.02
110543	Hexane	5.40E-06	0.01
115071	Propylene	6.27E-04	1.30
108883	Toluene	3.14E-05	0.07
1330207	Xylene	2.33E-05	0.05

Boiler Emission Factors - GHG (kg/MMBtu)¹

Pollutant	Emission Factor
CO ₂	53.02
CH ₄	1.00E-03
N ₂ O	1.00E-04

1. Emission factors for natural gas combustion per CARB's MRR.

Boiler Emission - GHG (MT)

Pollutant	Annual Emissions (MT/Year)
CO ₂	99.25
CH ₄	1.87E-03
N ₂ O	1.87E-04
CO ₂ e ¹	99.36

1. Based on the following global warming potentials as listed in CARB's MRR.

CO ₂	1
CH ₄	25
N ₂ O	298

Castle Metals AQIA

Scrubber

Nitric Acid Parameters

Weight % of HNO ₃	Density of ¹ HNO ₃ Solution (lb/gal)	Molecular Weight of HNO ₃ (lb/lb-mol)	Weight of HNO ₃ in Solution (lb/gal)	Molar Concentration (mol HNO ₃ /gal)	NO _x per Gallon of 4% HNO ₃ ² (lb NO _x /gal)
4%	12.63	63.01	0.5050	0.008	0.3046

- Density is conservatively assumed to be the density of 100 wt% (Anhydrous) HNO₃.
- The molar weight of NO_x is approx. to be 38 lb/lb-mol, estimated as 50 mol% NO₂ and 50 mol% NO (Nitrogen Oxide)
 - NO₂ (lb/lb-mol) 46
 - NO (lb/lb-mol) 30

Scrubber Emissions

Throughput of HNO ₃ (gal/day) ¹	Uncontrolled NO _x (lb/day)	Scrubber NO _x ² Control Efficiency (%)	Controlled NO _x (lb/day)	Controlled NO _x (lb/year)	Controlled NO _x (ton/year)
1200	365.5	99%	3.65	950.22	0.48

- Conservatively assuming a maximum of one tank capacity of nitric acid utilized per day.
- Control efficiency provided by manufacturer.

Tank Emissions

Evaporative Tank Emissions

Tank Number	Chemical	CAS	Controlled Emissions	
			lb/hr	lb/year
1	Nitric Acid	7697372	4.28E-05	0.38
1	Hydrofluoric Acid	7664393	3.50E-04	3.07
2	Nitric Acid	7697372	4.28E-05	0.38
2	Hydrofluoric Acid	7664393	3.50E-04	3.07

Total Utility GHG Emissions

Category	Annual Emissions (MT/year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e ¹
Electricity	18.98	1.80E-03	2.18E-04	19.09
Natural Gas	0.96	8.45E-05	1.80E-06	0.96
Total	19.93	1.88E-03	2.20E-04	20.04

1. Based on the following global warming potentials as listed in CARB's MRR.

CO ₂	1
CH ₄	25
N ₂ O	298

Electricity Emission Factors

Emission Factors (lb/MWh) ¹		
CO ₂	CH ₄	N ₂ O
348.637	0.033	0.004

1. Electricity emission factors for Southern California Edison from CalEEMod Appendix G, Table G-3.

Annual Emissions Associated with Electricity Usage

Annual Usage ¹ (MWh)	Annual Emissions (MT/year)		
	CO ₂	CH ₄	N ₂ O
120	18.98	0.002	0.000

1. Electricity usage will increase by about 10,000 kWh per month as a result of the Project.

Natural Gas Emission Factors

Emission Factors (lb/MMBtu) ¹		
CO ₂	CH ₄	N ₂ O
116.977	0.0104	0.0002

1. Natural gas emission factors from CalEEMod Appendix G, Table G-4.

Annual Emissions Associated with Natural Gas Usage

Annual Usage ¹ (MMBtu)	Annual Emissions (MT/year)		
	CO ₂	CH ₄	N ₂ O
18	0.96	8.45E-05	1.80E-06

1. Natural gas usage will increase by about 15 therms per month as a result of the Project. Conversion based on 1 therm = 0.1 MMBtu.

Castle Metals AQIA

On-Site Truck Travel - Line Sources Diesel Particulate Matter Emissions

Description	AERMOD ID	Total Truck Trips per Week	Travel Distance ¹ (meters)	Miles per Year	Annual DPM Emissions ² (lb/year)
Truck Travel Internal	TT_INT	10	574.07	185.5	2.15E-03
Truck Travel External	TT_EXT	10	602.62	194.7	2.26E-03

1. Travel distance as modeled in AERMOD.

2. Assumes PM₁₀ emissions equal DPM emissions.

PM10 RUNEx Emission Factor

Operation Year	Emission Factor ¹ (g/mile)	Emission Factor (lb/mile)
2026	5.26E-03	1.16E-05

On-Site Truck Idling - Point Sources Diesel Particulate Matter Emissions

Description	AERMOD ID	Total Truck Trips per Week	Idle minutes/truck	Idle Days/Year	Annual DPM Emissions ¹ (lb/year)
Truck Idling	IDLE	10	15	5.42	1.46E-04

1. Assume PM₁₀ emissions equal DPM emissions.

PM₁₀ Idling Emission Factor

Operation Year	Emission Factor ¹ (g/veh/day)	Emission Factor (lb/veh/day)
2026	1.22E-02	2.70E-05

1. HHD trucks are using the EMFAC2021 PM10 IDLEX EF for T7 Single Other Class 8.

APPENDIX C. HEALTH RISK ASSESSMENT MODELING FILES

(Electronic Modeling Files): <https://files.trinityconsultants.com/link/PBGNKPsEoXAYrjNC757oeT>

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	A M CASTLE & CO				Chemical Location			CERS ID	10272709			
Facility Name	A M CASTLE & CO				Bay 1 - Equipment Area				Facility ID	LACoFA0019437		
	14001 ORANGE AVE, PARAMOUNT 90723								Status	Submitted on 7/23/2025 5:43 AM		
						Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)				
DOT Code/Fire Haz. Class	Common Name	Unit	Quantities									
			Max. Daily	Largest Cont.	Avg. Daily							
	CIMPERIAL 1070 Blue Metalworking Fluid	Gallons	55	55	27.5		- Health Serious	Severely-Hydotreated Naphthenic	50%	64742-52-5		
		State	Storage Container		Pressue	Waste Code	Eye Damage Eye	Petroleum Distillates				
		Liquid	Steel Drum		Ambient		Irritation	ALKANES C14-16, CHLORO	20%	1372804-76-6		
		CAS No			Temperature		MONOETHANOLAMINE	5%	141-43-5			
		Type			Ambient		TRIAZINETRIETHANOL	3%	1029713			
		Mixture	Days on Site: 365					3%	102-71-6			
	Metal Shavings	Pounds	150.390625	5	75.1953125		- Physical	Aluminum	80%	7429-90-5		
		State	Storage Container		Pressue	Waste Code	Flammable	Stainless Steel	20%	12597-68-1		
		Solid	Other		Ambient		- Physical Contact					
		Type			Temperature		Water Emits					
		Mixture	Days on Site: 365				Ambient	Flammable Gas				
							- Physical					
							Combustible Dust					
	Milpro HW 46 Hydraulic Oil	Gallons	55	55	27.5			Lubricating oils (Petroleum),	80%	64742-58-1		
		State	Storage Container		Pressue	Waste Code		Hydotreated Spent				
		Liquid	Steel Drum		Ambient							
		CAS No			Temperature							
		Type			Ambient							
		Mixture	Days on Site: 365									

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	A M CASTLE & CO					Chemical Location	CERS ID 10272709										
Facility Name	A M CASTLE & CO					Bay 2 - Equipment Area					Facility ID	LACoFA0019437					
	14001 ORANGE AVE, PARAMOUNT 90723											Status	Submitted on 7/23/2025 5:43 AM				
							Annual Waste	Federal Hazard	Hazardous Components								
							Amount	Categories	(For mixture only)								
DOT Code/Fire Haz. Class	Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily				Component Name	% Wt	EHS	CAS No.					
	CIMPERIAL 1070 Blue	Gallons	60	55	30			- Health Serious	Severely-Hydrotreated Naphthenic	50%		64742-52-5					
	Metalworking Fluid	State	Storage Container		Pressue			Eye Damage Eye	Petroleum Distillates								
		Liquid	Steel Drum, Other		Ambient	Waste Code		Irritation	ALKANES C14-16, CHLORO	20%		1372804-76-6					
	CAS No	Type			Temperature				MONOETHANOLAMINE	5%		141-43-5					
		Mixture	Days on Site: 365		Ambient				TRIAZINETRIETHANOL	3%		4/4/4719					
	Metal Shavings	Tons	8.8	6.42	4.4			- Physical	Aluminum	80%		7429-90-5					
		State	Storage Container		Pressue	Waste Code		Flammable	Stainless Steel	20%		12597-68-1					
		Solid	Steel Drum, Other		Ambient			- Physical Contact									
		Type			Temperature			Water Emits									
		Mixture	Days on Site: 365		Ambient			Flammable Gas									
								- Physical									
								Combustible Dust									

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	A M CASTLE & CO				Chemical Location		CERS ID	10272709		
Facility Name	A M CASTLE & CO				Bay 2 - Polishers		Facility ID	LACoFA0019437		
	14001 ORANGE AVE, PARAMOUNT 90723						Status	Submitted on 7/23/2025 5:43 AM		
						Annual Waste	Hazardous Components			
							Federal Hazard	(For mixture only)		
DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Amount	Categories	Component Name	% Wt	EHS CAS No.
	Menzel Metallcheme Induoil	Gallons	55	55	27.5					
	HL42	State	Storage Container		Pressue	Waste Code				
		Liquid	Steel Drum		Ambient					
	CAS No	Type			Temperature					
		Mixture	Days on Site: 365		Ambient					
	TRIM MicroSol 585XT	Gallons	125	10	125		- Health Skin	Severely hydrotreated petroleum	40%	64742-52-5
		State	Storage Container		Pressue	Waste Code	Corrosion	oil		
		Liquid	Other		Ambient		Irritation	Triethanolamine	10%	102-71-6
		Type			Temperature		- Health Serious			
		Mixture	Days on Site: 365		Ambient		Eye Damage Eye			
							Irritation			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. A M CASTLE & CO			Chemical Location				CERS ID 10272709			
Facility Name A M CASTLE & CO			Bay 2 and Bay 3 - Equipment Areas				Facility ID LACoFA0019437			
14001 ORANGE AVE, PARAMOUNT 90723							Status Submitted on 7/23/2025 5:43 AM			
DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	CIMPERIAL 1070 Blue	Gallons	145.25	29	145.25		- Health Serious	Severely-Hydrotreated Naphthenic	50%	64742-52-5
	Metalworking Fluid	State	Storage Container		Pressue		Eye Damage Eye	Petroleum Distillates		
	CAS No	Liquid	Other		Ambient	Waste Code	Irritation	ALKANES C14-16, CHLORO	20%	1372804-76-6
		Type			Temperature			MONOETHANOLAMINE	5%	141-43-5
		Mixture	Days on Site: 365		Ambient			TRIAZINETRIETHANOL	3%	1029713
	Menzel Metallcheme Induoil	Gallons	97.75	22	97.75			TRIETHANOLAMINE	3%	102-71-6
	HL42	State	Storage Container		Pressue	Waste Code				
	CAS No	Liquid	Other		Ambient					
		Type			Temperature					
		Mixture	Days on Site: 365		Ambient					

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	A M CASTLE & CO	Chemical Location	CERS ID	10272709
Facility Name	A M CASTLE & CO	Bay 2 and Bay 4 - Equipment Areas	Facility ID	LACoFA0019437
	14001 ORANGE AVE, PARAMOUNT 90723		Status	Submitted on 7/23/2025 5:43 AM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	MOBILGEAR 600 XP	Gallons	60	10	60		- Health Serious	Long-Chain Alkyl Amine	0%	
	CAS No	State	Storage Container		Pressue	Waste Code	Eye Damage Eye Irritation			
		Liquid	Other		Ambient					
		Type			Temperature					
		Mixture	Days on Site: 365		Ambient					
	Schaeffer's 411 Maxkool SS	Gallons	205	75	205		- Health Acute Toxicity	Alcohols, C10-16, ethoxylated propoxylated	5%	69227-22-1
	CAS No	State	Storage Container		Pressue	Waste Code	- Health Skin Corrosion	Triethanolamine	5%	102-71-6
		Liquid	Other		Ambient		Irritation	2-Aminoethanol	3%	141-43-5
		Type			Temperature		- Health	Boric Acid	3%	10043-35-3
		Mixture	Days on Site: 365		Ambient		- Health Respiratory Skin Sensitization	2,2'-(cyclohexylimino)bisethanol	5%	4500-29-2
							- Health Serious Eye Damage Eye Irritation			
							- Health Specific Target Organ Toxicity			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. A M CASTLE & CO		Chemical Location				CERS ID 10272709					
Facility Name A M CASTLE & CO		Bay 3 - Equipment Area				Facility ID LACoFA0019437					
14001 ORANGE AVE, PARAMOUNT 90723						Status Submitted on 7/23/2025 5:43 AM					
						Annual Waste		Hazardous Components			
								(For mixture only)			
DOT Code/Fire Haz. Class		Common Name	Unit	Quantities		Annual Waste Amount	Federal Hazard Categories	Component Name		% Wt	EHS CAS No.
		Menzel Metallcheme Induoil	Gallons	110	55	55					
		HL42	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>				
		<u>CAS No</u>	Liquid	Steel Drum		Ambient					
			<u>Type</u>			<u>Temperature</u>					
			Mixture	Days on Site: 365		Ambient					
		Metal Shavings	Pounds	150.390625	5	75.1953125		- Physical	Aluminum	80%	7429-90-5
		<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressue</u>	<u>Waste Code</u>	Flammable	Stainless Steel	20%	12597-68-1
			Solid	Other		Ambient		- Physical Contact			
			<u>Type</u>			<u>Temperature</u>		Water Emits			
			Mixture	Days on Site: 365		Ambient		Flammable Gas			
								- Physical			
								Combustible Dust			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. A M CASTLE & CO			Chemical Location				CERS ID	10272709		
Facility Name A M CASTLE & CO			Bay 4 - Equipment Area				Facility ID	LACoFA0019437		
14001 ORANGE AVE, PARAMOUNT 90723							Status	Submitted on 7/23/2025 5:43 AM		
DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Gold Band AW-32 Hydraulic Oil	Gallons	55	55	27.5			Petroleum distillates, hydrotreated heavy paraffinic	90%	64742-54-7
	CAS No	State	Storage Container		Pressue	Waste Code		Severely Hydrotreated Heavy Naphthenic Petroleum Oil	90%	64742-52-5
		Liquid	Steel Drum		Ambient					
		Type			Temperature					
		Mixture	Days on Site: 365		Ambient				90%	
	Metal Shavings	Pounds	150.390625	5	75.1953125		- Physical	Aluminum	80%	7429-90-5
	CAS No	State	Storage Container		Pressue	Waste Code	Flammable	Stainless Steel	20%	12597-68-1
		Solid	Other		Ambient		- Physical Contact			
		Type			Temperature		Water Emits			
		Mixture	Days on Site: 365		Ambient		Flammable Gas			
							- Physical Combustible Dust			
	Oily Rags	Pounds	349.19	14	174.595		- Physical			
	CAS No	State	Storage Container		Pressue	Waste Code	Flammable			
		Solid	Can		Ambient	223	- Health Skin			
		Type			Temperature		Corrosion			
		Waste	Days on Site: 365		Ambient		Irritation			
							- Health Respiratory Skin Sensitization			
							- Health Serious Eye Damage Eye Irritation			
	Schaeffer's 411 Maxkool SS	Gallons	110	55	55		- Health Acute Toxicity	Alcohols, C10-16, ethoxylated propoxylated	5%	69227-22-1
	CAS No	State	Storage Container		Pressue	Waste Code	- Health Skin	Triethanolamine	5%	102-71-6
		Liquid	Steel Drum		Ambient		Corrosion	2-Aminoethanol	3%	141-43-5
		Type			Temperature		Irritation	Boric Acid	3%	10043-35-3
		Mixture	Days on Site: 365		Ambient		- Health Respiratory Skin Sensitization	2,2'-(cyclohexylimino)bisethanol	5%	4500-29-2
							- Health Serious Eye Damage Eye Irritation			
							- Health Specific Target Organ Toxicity			
	Shell Tellus S2 MX 46	Gallons	55	55	27.5		- Health Skin	Interchangeable low viscosity base oil (<20,5 cSt @40C)	90%	
	CAS No	State	Storage Container		Pressue	Waste Code	Corrosion			
		Liquid	Steel Drum		Ambient		Irritation			
		Type			Temperature		- Health Respiratory Skin Sensitization			
		Mixture	Days on Site: 365		Ambient		- Health Serious Eye Damage Eye Irritation			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	A M CASTLE & CO				Chemical Location	CERS ID 10272709			
Facility Name	A M CASTLE & CO				Forklifts / Sideloaders	Facility ID LACoFA0019437			
	14001 ORANGE AVE, PARAMOUNT 90723					Status Submitted on 7/23/2025 5:43 AM			
								Hazardous Components	
								(For mixture only)	
DOT Code/Fire Haz. Class	Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Component Name	% Wt EHS CAS No.
DOT: 2.1 - Flammable Gases	Propane	Gallons	126	8	126		- Physical		
Flammable Gas	CAS No	State	Storage Container		Pressue	Waste Code	Flammable		
	74-98-6	Liquid	Cylinder		> Ambient		- Physical Gas		
		Type			Temperature		Under Pressure		
		Pure	Days on Site: 365		Ambient		- Physical		
							Explosive		
							- Health Simple		
							Asphyxiant		

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. A M CASTLE & CO			Chemical Location				CERS ID	10272709		
Facility Name A M CASTLE & CO			Hazardous Material Storage Area				Facility ID	LACoFA0019437		
14001 ORANGE AVE, PARAMOUNT 90723							Status	Submitted on 7/23/2025 5:43 AM		
DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Oily Rags	Pounds	365.82	30	182.91		- Physical			
	CAS No	State	Storage Container		Pressue	Waste Code	Flammable			
		Solid	Steel Drum, Can		Ambient	223	- Health Skin			
		Type			Temperature		Corrosion			
		Waste	Days on Site: 365		Ambient		Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
Combustible Liquid, Class III-B	Oily Water	Gallons	1430	275	715		- Physical			
	CAS No	State	Storage Container		Pressue	Waste Code	Flammable			
		Liquid	Steel Drum, Plastic/Non-metalic		Ambient	223	- Health Skin			
		Type	Drum, Tote Bin		Temperature		Corrosion			
		Waste	Days on Site: 365		Ambient		Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	A M CASTLE & CO				Chemical Location		CERS ID	10272709		
Facility Name	A M CASTLE & CO				Receiving		Facility ID	LACoFA0019437		
	14001 ORANGE AVE, PARAMOUNT 90723						Status	Submitted on 7/23/2025 5:43 AM		
						Annual Waste			Hazardous Components (For mixture only)	
DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Federal Hazard				
			Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CAS No.
Combustible Liquid, Class III-B	Compressor Oily Water	Gallons	275	275	137.5		- Physical			
	CAS No	State	Storage Container		Pressue	Waste Code	Flammable			
		Liquid	Tote Bin		Ambient	223	- Health Skin			
		Type			Temperature		Corrosion			
		Waste	Days on Site: 365		Ambient		Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
							- Physical			
	Oily Rags	Pounds	232.79	14	116.395		Flammable			
	CAS No	State	Storage Container		Pressue	Waste Code	- Health Skin			
		Solid	Can		Ambient	223	Corrosion			
		Type			Temperature		Irritation			
		Waste	Days on Site: 365		Ambient		- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	A M CASTLE & CO				Chemical Location	CERS ID	10272709			
Facility Name	A M CASTLE & CO				Service Room	Facility ID	LACoFA0019437			
	14001 ORANGE AVE, PARAMOUNT 90723					Status	Submitted on 7/23/2025 5:43 AM			
						Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
DOT Code/Fire Haz. Class	Common Name	Unit	Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	Oily Rags	Pounds	457.27	55	228.635		- Physical			
	CAS No	State	Storage Container		Pressue	Waste Code	Flammable			
		Solid	Steel Drum		Ambient	223	- Health Skin			
		Type			Temperature		Corrosion			
		Waste	Days on Site: 365		Ambient		Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
DOT: 2.1 - Flammable Gases	Propane	Gallons	20	10	10		- Physical			
	CAS No	State	Storage Container		Pressue	Waste Code	Flammable			
Flammable Gas	74-98-6	Liquid	Cylinder		> Ambient		- Physical Gas			
		Type			Temperature		Under Pressure			
		Pure	Days on Site: 365		Ambient		- Physical			
							Explosive			
							- Health Simple			
							Asphyxiant			
	Shell Tellus S2 MX 46	Gallons	5	5	2.5		- Health Skin	Interchangeable low viscosity base 90%		
	CAS No	State	Storage Container		Pressue	Waste Code	Corrosion	oil (<20,5 cSt @40C)		
		Liquid	Other		Ambient		Irritation			
		Type			Temperature		- Health			
		Mixture	Days on Site: 365		Ambient		Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	A M CASTLE & CO				Chemical Location		CERS ID	10272709		
Facility Name	A M CASTLE & CO				Shipping		Facility ID	LACoFA0019437		
	14001 ORANGE AVE, PARAMOUNT 90723						Status	Submitted on 7/23/2025 5:43 AM		
							Annual Waste	Hazardous Components		
								(For mixture only)		
DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Federal Hazard				
			Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	Component Name	% Wt	EHS CAS No.
Combustible Liquid, Class III-B	Contaminated Mop Water	Gallons	110	55	55		- Physical			
	CAS No	State	Storage Container		Pressue	Waste Code	Flammable			
		Liquid	Steel Drum		Ambient	223	- Health Skin			
		Type			Temperature		Corrosion			
		Waste	Days on Site: 365		Ambient		Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
	TRIM MicroSol 585XT	Gallons	220	55	110		- Health Skin	Severely Hydrotreated Petroleum	40%	64742-52-5
	CAS No	State	Storage Container		Pressue	Waste Code	Corrosion	Oil		
		Liquid	Steel Drum		Ambient		Irritation	Triethanolamine	10%	102-71-6
		Type			Temperature		- Health Serious			
		Mixture	Days on Site: 365		Ambient		Eye Damage Eye			
							Irritation			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	A M CASTLE & CO				Chemical Location		CERS ID	10272709		
Facility Name	A M CASTLE & CO				West Yard		Facility ID	LACoFA0019437		
	14001 ORANGE AVE, PARAMOUNT 90723						Status	Submitted on 7/23/2025 5:43 AM		
							Hazardous Components (For mixture only)			
DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Component Name	% Wt	EHS CAS No.
	Metal Shavings	Tons	40.845225	10.72	20.4226125		- Physical	Aluminum	80%	7429-90-5
	CAS No	State	Storage Container		Pressue	Waste Code	Flammable	Stainless Steel	20%	12597-68-1
		Solid	Other		Ambient		- Physical Contact			
		Type			Temperature		Water Emits			
		Mixture	Days on Site: 365		Ambient		Flammable Gas			
							- Physical			
							Combustible Dust			
	Oily Rags	Pounds	133.02	16	66.51		- Physical			
	CAS No	State	Storage Container		Pressue	Waste Code	Flammable			
		Solid	Steel Drum		Ambient	223	- Health Skin			
		Type			Temperature		Corrosion			
		Waste	Days on Site: 365		Ambient		Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
	Oily Water	Gallons	550	275	275		- Physical			
	CAS No	State	Storage Container		Pressue	Waste Code	Flammable			
Combustible Liquid, Class III-B		Liquid	Tote Bin		Ambient	223	- Health Skin			
		Type			Temperature		Corrosion			
		Waste	Days on Site: 365		Ambient		Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
DOT: 2.1 - Flammable Gases	Propane	Gallons	224	8	112		- Physical			
	CAS No	State	Storage Container		Pressue	Waste Code	Flammable			
Flammable Gas	74-98-6	Liquid	Cylinder		> Ambient		- Physical Gas			
		Type			Temperature		Under Pressure			
		Pure	Days on Site: 365		Ambient		- Physical			
							Explosive			
							- Health Simple			
							Asphyxiant			

JULY 1, 2026

ORAL REPORT

CITY COUNCIL ACTIONS

JULY 1, 2026

PLANNING COMMISSION

COMMENTS FROM CITY ATTORNEY, COMMISSIONERS, AND STAFF