

**APPENDIX D**

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**COMMENTS AND RESPONSES TO COMMENTS ON DRAFT NEGATIVE  
DECLARATION**

**APPENDIX D**

**FINAL NEGATIVE DECLARATION**

**POLYCHEMIE INC. LOS ANGELES FACILITY**

**FACILITY EXPANSION PROJECT**

**RESPONSE TO COMMENTS**

**INTRODUCTION**

This Appendix, together with the Draft Negative Declaration constitutes the Final Negative Declaration for the Polychemie Inc. Los Angeles Facility Expansion Project.

The Negative Declaration was circulated for a 30-day public review and comment period on December 16, 2004. The Negative Declaration is also available at the South Coast Air Quality Management District (SCAQMD), 21865 Copley Drive, Diamond Bar, California 91765-4182 or by phone at (909) 396-2039. The Negative Declaration can also be downloaded by accessing the SCAQMD's CEQA web pages at <http://www.aqmd.gov/ceqa/nonaqmd.html>.

The Draft Negative Declaration included a detailed project description, the environmental setting for each environmental resource, and an analysis of each environmental resource on the California Environmental Quality Act (CEQA) checklist including all potentially significant environmental impacts. Based on the Draft Negative Declaration, no significant adverse environmental impacts were identified associated with the proposed Facility Expansion Project.

The SCAQMD received one comment letter on the Draft Negative Declaration during the public comment period and one comment letter was received after the close of the comment period. Responses to both comment letters are presented in this Appendix. The comments are bracketed and numbered. The related responses are identified with the corresponding number and are included in the following pages.

In order to adequately address the comments raised in the comment letters, new information is provided to merely clarify, amplify or make insignificant modifications to the Negative Declaration. Pursuant to CEQA Guidelines §15073.5(c)(2), recirculation is not necessary since the information is provided in response to written comments on the project's effects and does not result in new avoidable significant effects.



Alan C. Lloyd, Ph.D.  
Agency Secretary  
Cal/EPA



## Department of Toxic Substances Control

1011 North Grandview Avenue  
Glendale, California 91201



Arnold Schwarzenegger  
Governor

January 3, 2005

Mr. Michael Krause  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, California 91765-4182

NEGATIVE DECLARATION FOR POLICHEMIE INCORPORATED, LOS ANGELES  
FACILITY, FACILITY EXPANSION PROJECT, 4690 WORTH STREET, LOS  
ANGELES, CALIFORNIA

Dear Mr. Krause:

The Department of Toxic Substances Control (DTSC) reviewed the above mentioned document, dated December 16, 2004 and has the following comments regarding the hazardous waste management activities:

### Section 16 (b), Solid/Hazardous Waste, Page 2-48

1-1

1. Please clarify whether there is any hazardous waste generated by the facility's operation and maintenance activities, including tank cleanings and hazardous material spill controls. If hazardous waste is generated as a result of these activities, please discuss the hazardous waste management practices and the impact of the facility expansion on the hazardous waste generation.

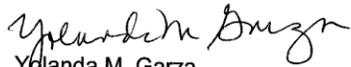
1-2

2. Contaminated soil classified as hazardous waste may be generated during the facility's construction activities. Please include in the discussion that if contaminated soil is generated, it would be placed in covered containers and accumulated on-site for no longer than 90 days. The management of 90-day hazardous waste should comply with requirements specified in Title 22, California Code of Regulations, Chapter 12. In addition, an Environmental Protection Agency Identification number should be obtained by the facility.

Mr. Michael Krause  
January 3, 2005  
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Should you have any questions regarding this letter, please contact Ms. Chia-Rin Yen at  
(818) 551-2182.

Sincerely,



Yolanda M. Garza  
Unit Chief

Southern California Permitting and Corrective Action Branch  
Hazardous Waste Management Branch

**COMMENT LETTER NO. 1**  
**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

**Yolanda Garza**  
January 3, 2005

**Response 1-1**

Hazardous waste is not routinely generated by the Polychemie facility. Raw products are delivered to the facility, converted into products, temporarily stored, and then transported from the facility. The materials used at the site and the products produced by the facility do not generate hazardous waste. Further, since the materials stored in tanks do not generate sludge, routine tank cleanings are not required. No routine operations at the Polychemie facility generate hazardous waste. This information is also included in Chapter 2 in the discussion under “16. b) Hazardous Waste.”

**Response 1-2**

Since the facility does not routinely generate hazardous waste, it is not expected that soil classified as hazardous waste will be encountered. However, as described on page 2-48 of the Negative Declaration, a maximum of about 12 cubic yards of contaminated soil may require disposal during the construction phase. Sufficient landfill capacity exists to handle a one-time disposal of contaminated soil. No hazardous waste by-products will be produced due to the operation of the proposed project; therefore, no increase in the generation of hazardous waste is expected due to the proposed project.

Contaminated soil that is discovered during construction activities is required to be handled per applicable requirements, including Title 22, California Code of Regulations (CCR), Chapter 12 and SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Contaminated soil that meets the definition of “hazardous waste,” will be placed in covered containers, stored on-site no longer than 90 days, and handled per the requirements of 22 CCR, Chapter 12. Where appropriate, the soil will be recycled if it is classified as a non-hazardous waste. The Polychemie facility already has been issued an Environmental Protection Agency identification number (CAL000231792) to use for identification purposes on manifests when hazardous waste needs to be transported for disposal.



**COUNTY OF LOS ANGELES**

**FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

P. MICHAEL FREEMAN  
FIRE CHIEF  
FORESTER & FIRE WARDEN

April 1, 2005

Mr. Michael Krause  
SCAQMD  
21865 Copley Drive  
Diamond Bar, CA 91765-4182

Dear Mr. Krause:

**NEGATIVE DECLARATION – POLYCHEMIE INC. FACILITY EXPANSION  
PROJECT, “UNINCORPORATED LOS ANGELES COUNTY” -- (EIR #2237/2005)**

The Negative Declaration for the Polychemie Inc. Facility Expansion Project has been reviewed by the Planning Division, Land Development Unit, and Forestry Division of the County of Los Angeles Fire Department. The following are their comments:

- 2-1 **LAND DEVELOPMENT UNIT -- GENERAL REQUIREMENTS:**  
The proposed development may necessitate multiple ingress/egress access for the circulation of traffic, and emergency response issues. The Department may condition future development to provide additional means of access.
- 2-2 The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.
- 2-3 Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check. There may be additional fire and life safety requirements during this time.
- 2-4 Every building/structure constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building/structure.
- 2-5 When involved with a subdivision in unincorporated areas within the County of Los Angeles, Fire Department requirements for access, fire flows and hydrants are addressed at the Los Angeles County Subdivision Committee meeting, during the subdivision tentative map stage.

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

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LAWDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COMMERCE	GLENDORA	IRVINDALE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA FLINTRIDGE	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
							WHITTIER

2-6

Fire sprinkler systems are required in some residential and most commercial occupancies. For those occupancies not requiring fire sprinkler systems, it is strongly suggested that fire sprinkler systems be installed. This will reduce potential fire and life losses. Systems are now technically and economically feasible for residential use.

**COMMERCIAL – INDUSTRIAL:**

The development may require fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration. Final fire flows will be based on the size of the buildings/structures, their relationship to other structures, property lines, and types of construction used. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:

2-7

1. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
2. No portion of a building/structure shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
3. Additional hydrants will be required if hydrant spacing exceeds specified distances.

Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in length. All on-site driveways/roadways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building/structure. The centerline of the access driveway shall be located parallel to, and within 30 feet of an exterior wall on one side of the proposed structure. Driveway width for non-residential developments shall be increased when any of the following conditions will exist:

2-8

1. Provide 34 feet in width, when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.
2. Provide 42 feet in width, when parallel parking is allowed on each side of the access roadway/driveway.
3. Any access way less than 34 feet in width shall be labeled "Fire Lane" on the final recording map, and final building plans.
4. For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING – FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.

Mr. Michael Krause  
April 1, 2005  
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**LIMITED ACCESS DEVICES (GATES ETC.):**

All access devices and gates shall meet the following requirements:

2-9

1. Any single gated opening used for ingress and egress shall be a minimum of 26 feet in width, clear-to-sky.
2. Any divided gate opening (when each gate is used for a single direction of travel - i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.
3. Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way, and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.
4. All limited access devices shall be of a type approved by the Fire Department.
5. Gate plans shall be submitted to the Fire Department, prior to installation. These plans shall show all locations, widths and details of the proposed gates.

Should any questions arise regarding design and construction, and/or water and access, please contact the Land Development Unit, EIR Specialist at (323) 890-4243.

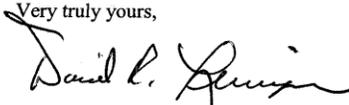
**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

2-10

The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. The areas germane to these statutory responsibilities have been addressed.

If you have any additional questions, please contact this office at (323) 890-4330

Very truly yours,



DAVID R. LEININGER, CHIEF, FORESTRY DIVISION  
PREVENTION BUREAU

DRL:lc

**COMMENT LETTER NO. 2**  
**COUNTY OF LOS ANGELES FIRE DEPARTMENT**

**David Leininger**  
April 1, 2005

**Response 2-1**

The Polychemie facility currently has several ingress/egress points that provide access to the existing facilities and will continue to be used to provide access to the new facilities. The ingress/egress points provide access to trucks and can be used to provide access to fire trucks as well. Additional ingress/egress points are not expected to be required. This issue will be reviewed with the Fire Department as part of the building fire plan check when building permits are submitted. It should be noted that the Fire Department has reviewed and signed off on portions of the proposed project, including the new non-ionic reactor (NR4).

**Response 2-2**

The SCAQMD understands that the proposed project must comply with all applicable fire code and ordinance requirements for construction access, water mains, fire flows and fire hydrants. The existing Polychemie facility has fire permits and the proposed project is not expected to introduce any new fire hazards to the site. Existing access, water mains, fire flows and fire hydrants are expected to be acceptable for development of the proposed project. Detailed fire department requirements will be reviewed with the Fire Department as part of the building fire plan check.

**Response 2-3**

Your comment that specific fire and safety requirements will be addressed at the building fire plan check is noted. Any additional fire safety requirements would serve to further reduce potential (insignificant) hazard impacts.

**Response 2-4**

The SCAQMD understands that the proposed project must comply with all applicable access requirements. Roadways currently exist within and surrounding the facility and the site is paved. Unobstructed access is currently provided to existing equipment and to the location of the proposed new equipment, such that additional roadways within the area are not expected to be required. Detailed fire department requirements will be reviewed with the Fire Department as part of the building fire plan check. Based on the configuration of the existing facility, it is not expected that additional access or new gates will be required. However, if the fire plan check identifies additional measures, these will be evaluated to determine if additional analysis under CEQA is required.

**Response 2-5**

The comment regarding subdivisions is noted. Although the proposed project is located within the County of Los Angeles, the proposed project is not a subdivision and will not require a tentative tract map.

**Response 2-6**

The proposed project does not include any new residential or commercial occupancies. The proposed project will add additional industrial facilities but no new office space. There are existing sprinklers in the warehouse and on equipment that may contain flammable materials. Fire safety mechanisms, such as the sprinkler system, and procedures have been installed to reduce potential life and property losses.

**Response 2-7**

Your comments regarding fire hydrants and water flows are noted. The existing Polychemie facility has fire permits, approved fire flows and local fire hydrants that meet the distance requirements. Detailed fire department requirements will be reviewed with the Fire Department as part of the building fire plan check for the proposed new equipment. Additional fire safety requirements will be incorporated into the proposed project.

**Response 2-8**

See Response 2-4 regarding facility access. The existing Polychemie facility has fire permits and currently provides access as approved by the fire department. No change to access is expected to be required to provide adequate access of fire equipment to the proposed new equipment. New and modified equipment is located outdoors and existing roads provide access to the location of the proposed new equipment. Detailed fire department requirements will be reviewed with the Fire Department as part of the building fire plan check.

**Response 2-9**

The Polychemie facility currently has several ingress/egress points that provide access to the existing facilities and will continue to be used to provide access to the new facilities. The facility is inspected by the County Fire Department petrochemical division on a routine basis and was last inspected on February 23, 2005. All aspects of the facility were determined to be acceptable with the applicable fire codes and requirements, including appropriate ingress/egress widths and clearance to the sky. The existing ingress/egress points provide routine access to trucks and can be used to provide access to fire trucks as well. Additional or new ingress/egress points or new gates are not currently expected to be required. This issue will be reviewed with the Fire Department as part of the building fire plan check, and Polychemie will comply with any required conditions imposed by the Fire Department.

**Response 2-10**

Your comment regarding the statutory responsibilities of the Fire Department is noted.