



SUBJECT: Administrative Action No. 1964

DATE: 08/27/21

BY: John King/Nathan Levey

LOCATION: 7743 Adams Street

ZONE: M-2 (Heavy Manufacturing) Zone

GENERAL

PLAN: Heavy Manufacturing

APPLICANT: Scott Fletcher/Carlton Forge Works

DESCRIPTION:

The applicant is requesting approval of an administrative action as mandated for metal-related manufacturing businesses that the South Coast Air Quality Management District (SCAQMD) requires a permit to operate. The Carlton Forge Works is located in the City of Paramount at 7743 Adams Street in the M-2 (Heavy Manufacturing) zone. The applicant produces rolled rings and open and closed die forgings for the aerospace, gas turbine, industrial, commercial, and nuclear industries. Carlton Forge Works has been manufacturing since its establishment in 1929 and currently employs approximately 165 people, which is a reduction from the 400 employed in 2019.

BACKGROUND:

In September 2018, the Paramount City Council adopted Ordinance No. 1106 for Zoning Ordinance Text Amendment No. 8, which revised manufacturing regulations in response to high and unhealthful levels of hexavalent chromium and other air emissions.

The purpose of the administrative action is to allow the City of Paramount to have a complete understanding as to how metal-related manufacturing businesses operate. An application would contain a catalog of equipment, materials, and uses. An administrative action approval would also include operating conditions as incorporated in the Zoning Ordinance with Ordinance No. 1106. These performance standards are codified in Sections 17.36.050 and 17.36.060 of the Paramount Municipal Code for metal manufacturing business located in the M-2 zone.

SITE DESCRIPTION:

Carlton Forge Works is located on 22 parcels that comprise approximately 9.5 acres. There are 10 buildings located throughout the project site, with the main entrance and administration building being located on Vermont Avenue, near Adams Street. The largest of these buildings is the manufacturing building, which totals 299,490 square feet. In addition to the manufacturing and administration buildings, there are buildings for shipping, a saw department, maintenance, outside processing, production grinding, showers/lockers, offices, and compressors. Several of the buildings also contain offices. In addition to the buildings, the site has outside storage totaling approximately 98,000 square feet and a parking lot. At the time of this writing, a building at the northwest corner of Colorado Avenue and Adams Street was recently demolished; additional



parking facilities are now in the construction phase. There are 12 gates that provide access to the site along Somerset Boulevard, Vermont Avenue, and Jefferson Street. The main gate is considered to be Gate #4, located on the western side of the intersection of Vermont Avenue and Adams Street.

Carlton Forge Works – Assessor’s Parcel Numbers

6240-013-015	6240-013-021	6240-013-008	6240-015-004
6240-013-014	6240-013-905	6240-013-902	6240-015-016
6240-015-018	6240-016-027	6240-013-020	6240-015-017
6240-016-026	6240-015-018	6240-015-15	6240-015-007
6240-015-019	6240-015-010	6240-015-009	6240-015-008
6240-015-020	6240-015-003		

SITE PLAN

The site plan below represents the primary Carlton Forge Works manufacturing campus. The area shown is bounded by Somerset Boulevard to the north, Jefferson Street to the south, Vermont Avenue to the east, and the Union Pacific railroad right-of-way to the west.

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APPLICATION DETAILS:

The following details are compiled from the Administrative Action application, Planning Department records, and SCAQMD information.

Business Operations

Office

Offices are located in the administration building in the eastern portion of the manufacturing site, near the intersection of Vermont Avenue and Adams Street. Additionally, there are offices located to the north of the administration building and in the main manufacturing building that runs along the entire western portion of the site.

Manufacturing

Carlton Forge Works produces seamless rolled rings and open and closed die forgings for aerospace, gas turbine, industrial, commercial, and nuclear industries. The production of these rings and die forgings requires sawing, grinding, heating, and open and closed die forging of alloy billet.

The production of variously sized rings includes the use of any one of 62 furnaces onsite with temperatures ranging from 1,700° to 2,200° F. It also involves the use of ring mills which are used to shape and round out the rings, four ring sizers, and sawing stations. All furnaces are equipped with low nitrogen oxides (NO_x) burners.

Open and closed die forging involves the process of shaping heated metal between two dies by bringing the dies closer together in a hammering or pressing manner. In closed die forging, the heated metal is completely enclosed when the two dies meet. In open die forging, the heated metal is not completely enclosed when the two dies are brought closer together. Both of these processes involve heating metal in one of the 62 furnaces followed by the use of two or more dies that are used via a hammering or pressing manner to achieve the desired shape.

Storage and Other Ancillary Activities

Ancillary process that support the manufacturing operations include:

The grinding stations are involved in the grinding and shaping of the rings and die forgings produced by the applicant. The grinding operations building is under a Permanent Total Enclosure. There are three dust collectors (called baghouses) which are connected to the grinding stations to reduce particulate matter, and an additional odor-reducing air pollution control device is connected to each dust collector. These devices incorporate pre-filters, HEPA filters, and granular activated carbon filters.

In addition to the grinding operations, there are welding stations for any repair work as well as final manufacturing.

Finally, forklifts are used throughout the site for the onsite transportation of materials and products.



Permits – SCAQMD

Permits Declared by Applicant	
Permit No.	Description
22911	RECLAIM/Title V Facility Permit
G57738	Permit to Operate Permanent Total Enclosure with Negative Air/North Bank of Grinders
G57739	Permit to Operate Center Bank of Grinders
G57740	Permit to Operate South Bank of Grinders
G57759	Permit to Operate North Bank Unit for PM/Odor Control
G57761	Permit to Operate Center Bank Unit for PM/Odor Control
G57760	Permit to Operate South Bank Unit for PM/Odor Control
A/N 393669	Permit to Operate Furnace, Forge No. R50
D25800	Permit to Operate Furnace, Forge No. B2012
D25801	Permit to Operate Furnace, Forge No. B2512
A/N 361869	Permit to Operate Furnace, Forge No. R2
A/N 361870	Permit to Operate Furnace, Forge No. R1
A/N 383749	Permit to Operate Furnace, Forge No. 403
A/N 383748	Permit to Operate Furnace, Forge No. 402
A/N 383750	Permit to Operate Furnace, Forge No. 404
A/N 383751	Permit to Operate Furnace, Forge No. 405
A/N 383752	Permit to Operate Furnace, Forge No. 406
A/N 383754	Permit to Operate Furnace, Forge No. 408
A/N 383755	Permit to Operate Furnace, Forge No. 409
A/N 383756	Permit to Operate Furnace, Forge No. 410
A/N 383757	Permit to Operate Furnace, Forge No. 411
A/N 383759	Permit to Operate Furnace, Forge No. 412
A/N 383760	Permit to Operate Furnace, Forge No. 413
A/N 383761	Permit to Operate Furnace, Forge No. 414
A/N 383762	Permit to Operate Furnace, Forge No. 415
A/N 383763	Permit to Operate Furnace, Forge No. 417
A/N 383765	Permit to Operate Furnace, Forge No. 416
A/N 383764	Permit to Operate Furnace, Forge No. 418
A/N 383784	Permit to Operate Furnace, Forge No. 419
A/N 377040	Permit to Operate Furnace, Forge No. 420
A/N 392912	Permit to Operate Furnace, Forge No. 421
A/N 392913	Permit to Operate Furnace, Forge No. 422
A/N 427710	Permit to Operate Furnace, Forge No. 423
A/N 433050	Permit to Operate Furnace, Forge No. 424
A/N 433052	Permit to Operate Furnace, Forge No. 425
A/N 369991	Permit to Operate Furnace, Heat Treating No. AL-6
D25799	Permit to Operate Heat Treating Furnace
D25798	Permit to Operate Heat Treating Furnace
D25797	Permit to Operate Heat Treating Furnace



D25796	Permit to Operate Heat Treating Furnace
D25795	Permit to Operate Heat Treating Furnace
D25794	Permit to Operate Heat Treating Furnace
D25793	Permit to Operate Heat Treating Furnace
D25964	Permit to Operate Heat Treating Furnace
D25963	Permit to Operate Heat Treating Furnace
D25962	Permit to Operate Heat Treating Furnace
D25961	Permit to Operate Heat Treating Furnace
D25960	Permit to Operate Heat Treating Furnace
D25959	Permit to Operate Heat Treating Furnace
D25958	Permit to Operate Heat Treating Furnace
D25957	Permit to Operate Heat Treating Furnace
D25956	Permit to Operate Heat Treating Furnace
D25955	Permit to Operate Heat Treating Furnace
D25954	Permit to Operate Heat Treating Furnace
D25953	Permit to Operate Heat Treating Furnace
D79917	Permit to Operate Storage Tank/Pressure Tank LPG

Permits – Other Agencies

Agency	Permit No.	Description
Los Angeles County Certified Unified Program Agency	AR0061790	Annual Unified Program Facility Permit
Sanitation Districts of Los Angeles County	20772	Industrial Wastewater Discharge
California Water Board	4191001365	General Permit to Discharge Storm Water Associated with Industrial Activity
California Department of Industrial Relations	A020771-10	CA Department of Industrial Relations Division of Occupational Safety and Health Pressure Vessel Permit to Operate



PARAMOUNT CONDITIONAL USE PERMITS

CUP No.	Description	Approval Date
88	Allow new forge hammers with "Building B." [Original approval – Dec. 1981]. Removal of a five-year time limitation on the use of drop hammers. [Reconsideration of condition of approval – Feb. 1982]	December 17, 1981 (original application). February 11, 1982 (reconsideration of one condition of approval)
484	Allow construction of two metal buildings for property located at 7754 Jefferson Street in the M-2 (Heavy Industrial) zone. This is in connection with Zone Variance No. 374.	July 12, 2000
544	Allow construction of a metal building for the property located at the alley north of Madison Street, South of Jefferson Street, and between Vermont Avenue and the Union Pacific Railway right-of-way.	December 10, 2003
593	Allow outside storage for property located west of and adjacent to 7754 Jefferson Street. This is in connection with Zone Variance No. 388.	October 12, 2005
600	Allow construction of a 34,078 square foot metal building addition to an existing metal structure located at 7743 Adams Street.	March 8, 2006
613	Allow outside storage for property west of and adjacent to 7754 Jefferson Street.	May 9, 2007
683	Allow construction of a metal canopy and allow outside storage at 15543 and 15559 Vermont Avenue.	June 9, 2010
713	Allow installation of 26-foot-tall compressed air tanks at 7743 Adams Street.	November 8, 2011
761	Install a 1,000 gallon, above-ground diesel tank at a location immediately east of 7743 Jefferson Street.	June 10, 2014
772	Install and operate a 4,000-ton hydraulic forging press at 7743 Jefferson to replace the drop hammer forge.	June 10, 2014

OTHER INFORMATION

Signs: Section 17.36.050 includes provisions for a wall sign to be installed in compliance with M-2 sign regulations. The applicant has a wall sign that is located above the main entrance into the lobby. Signage with the company's address, hazard diamond, and warning signs are located to the north of the lobby entrance. At Gates 1, 2, 4, and 9, signage is posted with information to report any air quality issues, such as odors, visible dust, or smoke to the SCAQMD. California Proposition 65 signage is located on all gates at Carlton Forge Works. Signs required by SCAQMD Rule 1430 ("Control of Emissions from Metal Grinding Operations at Metal Forging Facilities") are also posted on the site perimeter.



The International Organization for Standards (ISO): The applicant is not ISO certified, but does maintain Nadcap certification in accordance with AS9100 (which facilitates the production of aviation, space, and defense products by providing structure in the form of leadership, planning, support, operation, performance evaluation, and improvement).

Public tours: The applicant can commit to an annual off-site informational session to inform the community-at-large about business operations and practices. The applicant is not amenable to small group tours on a case-by-case basis (subject to restrictions) due to safety concerns.

Notices of Violations: The South Coast Air Quality Management District issued the following Notices of Violation (NOVs) to Carlton Forge Works within the last ten years.

Date	Violation No.	Rule Broken	Description	Status
01/03/202	P69535		Failure to maintain equipment in such a manner that the differential pressure complies with permitted limit	In Compliance
08/03/2019	P68316	2004(f)(3); 3002(c)(1)	Failure to comply with permit condition Section E, Condition 2	In Compliance
10/04/2018	P65223	402; 41700	Discharging such quantities of air contaminants which caused nuisance to a considerable number of persons or to the public	Closed Case/In Compliance
07/01/2018	P68312	2004(e); 2004(b)(4); 2004(f)(1); 3002(c)(1)	Failure to submit accurate QCER's for 1 st , 2 nd , and 3 rd Quarter of CY2018; Failure to submit accurate APEP for CY2018; Failure to comply with Permit to Operate condition D323.1 and D381.1; Failure to comply with Title V Facility Permit to Operate conditions D323.1 and D381.1	Closed Case/ In Compliance
10/13/2017	P60289	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/In Compliance
09/21/2017	P63767	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/Abatement



Date	Violation No.	Rule Broken	Description	Status
09/12/2017	P65212	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/Abatement
09/11/2017	P65055	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/Abatement
08/29/2017	P65211	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/Abatement
07/01/2017	P64149	2004(f)(1); 2005(f)(1); 3002(c)(1)	Failure to comply with all rules and permit conditions applicable to the facility, as specified in the facility permit; failure to hold adequate RTCs at the commencement of each compliance year in an amount equal to the amount of required offsets as listed in the permit conditions; failure to operate all equipment at a Title V facility in compliance with all terms, requirements, and conditions specified in the Title V Permit	Closed Case/In Compliance
05/08/2017	P65209	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/Abatement
05/31/2017	P63764	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/Abatement



Date	Violation No.	Rule Broken	Description	Status
05/25/2017	P63763	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/Abatement
04/07/2017	P65208	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/Abatement
04/06/2017	P65207	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/Abatement
04/04/2017	P63760	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Abatement
03/30/2017	P61738	2012(e)(2)(A)	Failed to monitor all natural gas fuel lines to 39 process unit furnaces	Closed Case/In Compliance
03/24/2017	P65206	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/Abatement
02/24/2017	P60279	402	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/In Compliance
02/23/2017	P60278	402	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/In Compliance
02/16/2017	P65205	402; California Health and Safety Code	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/In Compliance



Date	Violation No.	Rule Broken	Description	Status
		Section 41700		
02/09/2017	P63758	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/Abatement
02/07/2017	P63759	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/Abatement
02/02/2017	P65204	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/In Compliance
01/26/2017	P65203	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/In Compliance
01/24/2017	P65202	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/In Compliance
01/13/2017	P52999	402; California Health and Safety Code Section 41700	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/Abatement
01/01/2017	P64376	2012(e)	Inaccurate QCER for the 3 rd Quarter for the 2016 calendar year	Closed Case/In Compliance
12/08/2016	P52998	402; California Health and Safety Code	Discharged air contaminants which caused public nuisance to a considerable number of persons	Closed Case/In Compliance



Date	Violation No.	Rule Broken	Description	Status
		Section 41700		
07/01/2015	P64403	2004(b)(1); 2004(d)(1)	Failed to reconcile NOx emissions in the 2 nd quarter of the 2015 compliance year; NOx emissions from the beginning of the 2015 compliance year through the end of the 2 nd quarter exceeded the annual NOx emissions allocation in effect at the end of the reconciliation period for that quarter	Closed Case
01/13/2014	P57644	3002(c)(1); 2004(f)(1)	Operating Device D119 contrary to permit condition C1.3 by exceeding the fuel limit; operating Device D186 and D188 contrary to permit condition C1.1; operating Device D53 contrary to permit condition A63.3; operating Device D109 contrary to permit condition A63.3	Closed Case/In Compliance
08/30/2012	P55529	2004(b)(4)	Failure to submit an annual permit emissions program (APEP) report for the 2011 compliance year	Closed Case

RECOMMENDED ACTION:

Administrative Action Case No. 1964 is approved subject to the following conditions:

1. ____ Except as set forth in conditions, development shall remain substantially as shown on the approved plans. New development must be approved by the Planning Department prior to construction.
2. ____ This application shall not be effective until the applicant has first filed at the office of the Planning Department a sworn affidavit by **September 9, 2021** both acknowledging and accepting all conditions of approval of this Administrative Action. Failure to provide the City of Paramount with the requisite affidavit shall render the Administrative Action void.
3. ____ No future exterior structural alteration, other than those building treatments previously approved, shall be permitted without the prior approval of the Planning Director.



4. ____ The use of tarps is prohibited in front setbacks, side setbacks that abut an alley or street, and over driveways as specified in Section 17.36.090(M)(1) of the Paramount Municipal Code. The inspection tent between the inspection building and the saw building shall be removed by September 1, 2022.
5. ____The installation of exterior window security bars visible from the public right-of-way is prohibited as specified in Section 17.36.090(L) of the Paramount Municipal Code.
6. ____ Landscaping shall be maintained to the satisfaction of the Planning Department in perpetuity. Landscape changes are subject to Planning Department review and approval. Mature trees shall not be removed without prior approval by the Planning Department. Plant material shall be maintained in a thriving condition, free from weeds and overgrowth, in perpetuity in compliance with Chapter 17.96 (Water-Efficient Landscape Provisions) of Title 17 (Zoning Ordinance) of the Paramount Municipal Code.
7. ____Sufficient quantities of exterior paint shall be maintained for the removal of graffiti, peeling paint, or other blemishes on the exterior of buildings.
8. ____The project shall comply with all pertinent Building and Safety Division requirements.
9. ____The operator shall, at all times, maintain and comply with required operating permit from all pertinent agencies.
10. ____The responsible party shall maintain to the extent feasible the existing equipment, materials, and uses as listed to the Planning Department in the application materials for this Administrative Action, including but not limited to all equipment, materials, or uses permitted by the City, South Coast Air Quality Management District, Los Angeles County Fire Department, Los Angeles County Sanitation District, and the Regional Water Quality Control Board. The responsible party shall notify the Planning Department of proposed equipment that requires building, mechanical, plumbing, or electrical permits or a combination one or more permits. The responsible party shall notify the Planning Department of proposed uses. Any new equipment, materials, or uses must comply with the Paramount Municipal Code and the conditions set forth herein.
11. ____The responsible party shall comply with and maintain required permits from all other applicable regulatory agencies, including but not limited to the United States Environmental Protection Agency, the Los Angeles County Fire Department, the South Coast Air Quality Management District, the State Water Resources Control Board, and the Los Angeles Regional Water Quality Control Board, and the City of Paramount.
12. ____The use of Best Available Control Technology is required at minimum. A facility shall install Lowest Achievable Emission Rate equipment if required by the South Coast Air Quality Management District.
13. ____The use shall comply with required housekeeping and best management practices of the South Coast Air Quality Management District and all applicable regulatory government agencies.



14. ____ As specified in Section 17.36.060(D)(3) of the Paramount Municipal Code, to the extent that installation of emissions control equipment, including retrofit equipment, is required by an applicable South Coast Air Quality Management District rule or regulation, then such required emissions control equipment shall comply with Best Available Control Technology requirements. A facility shall install Lowest Achievable Emission Rate equipment if required by the South Coast Air Quality Management District.
15. ____ Core production and manufacturing activities shall be conducted within an enclosed structure as specified in Section 17.36.060(D)(3) of the Paramount Municipal Code. Notwithstanding the foregoing, ancillary activities including but not limited to maintenance; inspection; measuring; active packing, loading, and unloading of deliveries shall be permitted outdoors. Other ancillary activities shall be approved by the Planning Director.
16. ____ All feasible building resiliency and environmental sustainability provisions shall be incorporated into any new construction and significant building rehabilitation.
17. ____ Certification is encouraged to be obtained from the International Standardization Organization (ISO) or equivalent international standard-setting body as relevant regarding environmentally sustainable practices and organization.
18. ____ Public tours of the business operation shall be reasonably accommodated at least once each year for the purpose of informing the public of business operations and practices. A comprehensive information session at an off-site location is acceptable provided direct facility access impedes public safety or compromises proprietary processes, as determined by the business owner in consultation with the Planning Director. The operator shall provide details to the Planning Department at least three weeks in advance of a public tour or equivalent information session annually. The operator shall submit documentation of the public tour (e.g. sign-in sheets or meeting handouts) to the Planning Department annually.
19. ____ With consideration of days and hours of operation, specific operations shall be mitigated to minimize impacts upon surrounding uses and infrastructure. Deliveries shall be limited to the hours of 7:00 a.m. to 8 p.m. as much as possible to mitigate or minimize impacts directly relating to such activity on surrounding uses and infrastructure.
20. ____ 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).
21. ____ The applicant shall comply with all relevant regulations for the disposal of waste of all pertinent agencies, including but not limited to the California Department of Resources Recycling and Recovery (CalRecycle) and California Department of Toxic Substances Control (DTSC).



22. ____The operator shall coordinate in good faith with the Planning Director or designee for an annual onsite inspection to be conducted by December 31 of each year with Planning Department staff and Public Safety Department staff to verify approved structures, operations, and equipment. The operator shall accept personnel from applicable regulatory agencies as needed to accompany City of Paramount staff during the course of annual inspections.
23. ____The existing wall sign shall be maintained in good condition. The wall sign may be replaced in the future following separate Planning Department review and approval of a sign proposal.
24. ____The operator shall comply with all conditions of approval and mitigations of Conditional Use Permits Nos. 88, 484, 544, 593, 600, 613, 683, 713, 761, and 772.
25. ____All conditions of approval shall be met prior to final approval by the Planning Department.