

PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE

AGENDA DATE: April 24, 2025

FROM: PLANNING & DEVELOPMENT SERVICES

AGENDA TIME 1:30 PM / No.3

PROJECT TYPE: RASIRC Imperial Facility
CUP #24-0024 / IS #24-0034 SUPERVISOR DIST #5

LOCATION: 3555 Old Highway 111 APN: 040-250-024-000
Imperial, CA 92251 PARCEL SIZE: 9.59 AC

GENERAL PLAN (existing) Mesquite Lake Specific Plan GENERAL PLAN (proposed) N/A

ZONE (existing) ML-I-2-RE ZONE (proposed) N/A

GENERAL PLAN FINDINGS ☒ CONSISTENT ☐ INCONSISTENT ☐ MAY BE/FINDINGS

PLANNING COMMISSION DECISION:

HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

PLANNING DIRECTORS DECISION:

HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 04/24/2025

INITIAL STUDY: #24-0034

☐ NEGATIVE DECLARATION ☒ MITIGATED NEG. DECLARATION ☐ EIR

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS

☐ NONE

☒ ATTACHED

AG

☒ NONE

☐ ATTACHED

APCD

☐ NONE

☒ ATTACHED

E.H.S.

☒ NONE

☐ ATTACHED

FIRE / OES

☐ NONE

☒ ATTACHED

SHERIFF

☒ NONE

☐ ATTACHED

OTHER

Imperial Irrigation District (IID), CEO, Yuma Quechan Indian Tribe

REQUESTED ACTION:

(See Attached)

Planning & Development Services

801 MAIN STREET, EL CENTRO, CA, 92243 442-265-1736

(Jim Minnick, Director)

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- ☐ **NEGATIVE DECLARATION**
☐ **MITIGATED NEGATIVE DECLARATION**

*Initial Study & Environmental Analysis
For:*

**Conditional Use Permit (CUP) #24-0024
Initial Study (IS) #24-0034
RASIRC Imperial Facility**



Prepared By:

COUNTY OF IMPERIAL
Planning & Development Services Department
801 Main Street
El Centro, CA 92243
(442) 265-1736
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April 2025

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SECTION 1 INTRODUCTION

A. PURPOSE

This document is a ☐ policy-level, ☒ project level Initial Study for evaluation of potential environmental impacts resulting with the proposed project, Hydrazine Facility (Refer to Exhibit "A" & "B").

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS AND THE IMPERIAL COUNTY'S GUIDELINES FOR IMPLEMENTING CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's "CEQA Regulations Guidelines for the Implementation of CEQA, as amended", an **Initial Study** is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration would be appropriate for providing the necessary environmental documentation and clearance for any proposed project.

☐ According to Section 15065, an **EIR** is deemed appropriate for a particular proposal if the following conditions occur:

- The proposal has the potential to substantially degrade quality of the environment.
- The proposal has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
- The proposal has possible environmental effects that are individually limited but cumulatively considerable.
- The proposal could cause direct or indirect adverse effects on human beings.

☐ According to Section 15070(a), a **Negative Declaration** is deemed appropriate if the proposal would not result in any significant effect on the environment.

☐ According to Section 15070(b), a **Mitigated Negative Declaration** is deemed appropriate if it is determined that though a proposal could result in a significant effect, mitigation measures are available to reduce these significant effects to insignificant levels.

This Initial Study has determined that the proposed applications will not result in any potentially significant environmental impacts and therefore, a Negative Declaration is deemed as the appropriate document to provide necessary environmental evaluations and clearance as identified hereinafter.

This Initial Study and Negative Declaration are prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15070 of the State & County of Imperial's Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the County of Imperial; and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the

principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION

This Initial Study and Negative Declaration are informational documents which are intended to inform County of Imperial decision makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed applications. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

The Initial Study and Negative Declaration, prepared for the project will be circulated for a period of 20 days (*30-days if submitted to the State Clearinghouse for a project of area-wide significance*) for public and agency review and comments. At the conclusion, if comments are received, the County Planning & Development Services Department will prepare a document entitled "Responses to Comments" which will be forwarded to any commenting entity and be made part of the record within 10-days of any project consideration.

D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION

This Initial Study is organized to facilitate a basic understanding of the existing setting and environmental implications of the proposed applications.

SECTION 1

I. INTRODUCTION presents an introduction to the entire report. This section discusses the environmental process, scope of environmental review, and incorporation by reference documents.

SECTION 2

II. ENVIRONMENTAL CHECKLIST FORM contains the County's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a potentially significant impact, potentially significant unless mitigation incorporated, less than significant impact or no impact.

PROJECT SUMMARY, LOCATION AND ENVIRONMENTAL SETTINGS describes the proposed project entitlements and required applications. A description of discretionary approvals and permits required for project implementation is also included. It also identifies the location of the project and a general description of the surrounding environmental settings.

ENVIRONMENTAL ANALYSIS evaluates each response provided in the environmental checklist form. Each response checked in the checklist form is discussed and supported with sufficient data and analysis as necessary. As appropriate, each response discussion describes and identifies specific impacts anticipated with project implementation.

SECTION 3

III. MANDATORY FINDINGS presents Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

IV. PERSONS AND ORGANIZATIONS CONSULTED identifies those persons consulted and involved in

preparation of this Initial Study and Negative Declaration.

V. REFERENCES lists bibliographical materials used in preparation of this document.

VI. NEGATIVE DECLARATION – COUNTY OF IMPERIAL

VII. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY)

E. SCOPE OF ENVIRONMENTAL ANALYSIS

For evaluation of environmental impacts, each question from the Environmental Checklist Form is summarized and responses are provided according to the analysis undertaken as part of the Initial Study. Impacts and effects will be evaluated and quantified, when appropriate. To each question, there are four possible responses, including:

1. **No Impact:** A “No Impact” response is adequately supported if the impact simply does not apply to the proposed applications.
2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.
3. **Potentially Significant Unless Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact”.
4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

This Initial Study and Negative Declaration will be conducted under a ☐ policy-level, ☒ project level analysis. Regarding mitigation measures, it is not the intent of this document to “overlap” or restate conditions of approval that are commonly established for future known projects or the proposed applications. Additionally, those other standard requirements and regulations that any development must comply with, that are outside the County’s jurisdiction, are also not considered mitigation measures and therefore, will not be identified in this document.

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

Information, findings, and conclusions contained in this document are based on incorporation by reference of tiered documentation, which are discussed in the following section.

1. Tiered Documents

As permitted in Section 15152(a) of the CEQA Guidelines, information and discussions from other documents can be included into this document. Tiering is defined as follows:

“Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared

for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."

Tiering also allows this document to comply with Section 15152(b) of the CEQA Guidelines, which discourages redundant analyses, as follows:

"Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including the general plans, zoning changes, and development projects. This approach can eliminate repetitive discussion of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration."

Further, Section 15152(d) of the CEQA Guidelines states:

"Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:

- (1) Were not examined as significant effects on the environment in the prior EIR; or
- (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

2. Incorporation By Reference

Incorporation by reference is a procedure for reducing the size of EIRs/MND and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly-drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San Francisco Ecology Center v. City and County of San Francisco* [1975, 48 Ca.3d 584, 595]). This document incorporates by reference appropriate information from the "Final Environmental Impact Report and Environmental Assessment for the "County of Imperial General Plan EIR" prepared by Brian F. Mooney Associates in 1993 and updates.

When an EIR or Negative Declaration incorporates a document by reference, the incorporation must comply with Section 15150 of the CEQA Guidelines as follows:

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). The General Plan EIR and updates are available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.
- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.
- These documents must summarize the portion of the document being incorporated by reference or briefly

describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.

- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.
- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.

II. Environmental Checklist

1. **Project Title:** RASIRC Imperial Facility - Conditional Use Permit (CUP) #24-0024 / Initial Study (IS) #24-0034
2. **Lead Agency:** Imperial County Planning & Development Services Department
3. **Contact person and phone number:** Luis Bejarano, Planner I, (442)265-1736, ext. 1745
4. **Address:** 801 Main Street, El Centro CA, 92243
5. **E-mail:** luisbejarano@co.imperial.ca.us
6. **Project location:** 3555 Old Highway 111, Imperial, CA 92251
7. **Project sponsor's name and address:** Duggins Construction Inc; 341 W Crown Court, Imperial, CA 92251
8. **General Plan designation:** Mesquite Lake Specific Plan
9. **Zoning:** ML-I-2-RE (Mesquite Lake Medium Industrial with Renewable Energy Overlay)

10. Description of project:

The applicant submitted a Conditional Use Permit application (CUP #24-0024) for a N2H4 (Hydrazine) processing facility, with Initial Study #24-0034. The proposed building will be a total of 7,000 ft². This building will be a warehouse facility with an office, parking, and site improvements. The building will have a driveway access from Old Highway 111. This project will be located at property identified under Assessor's Parcel Number (APN) 040-250-024-000, within the Mesquite Lake Specific Plan area.

The proposed N2H4 (Hydrazine) processing facility will be built ensuring safe handling, efficient production, and compliance with industry standards. The facility will include storage metal containers with appropriate cabinets and containers for raw chemical materials and waste, detached from the main building and constructed to store chemicals safely. The hydra-storage is required near the building because there is going to be a double wall pipe (to prevent leaks) connected from the storage to the building to route the hydrazine for processing. The office portion of the building is located at the east side, near the parking lot. A total of 4 to 12 employees will be working in the warehouse/office, with daily operating hours estimated to be from 7:00 am to 5:00 pm approximately.

This site will provide 15 automobile parking stalls as required by the County of Imperial zoning ordinance. A box delivery truck (UPS truck) will have access to the unloading area for shipping and receiving, approximately 5 to 10 times a month.

Employees' responsibilities will cover facilities and safety management, production management and process control. The facility will be a secure, closed environment with access-controlled building (badging) inside a fenced environment (gated entry).

The facilities operations consist of receiving low grade Hydrazine chemical shipped under UN 2029 that typically has contaminants and moisture levels in the 0.01% range of the total composition. This hydrazine is then purified and dried so that the moisture levels are less than 0.0000001% of the total composition. This level of purity is necessary for many of the stringent requirements in semiconductor manufacturing.

The applied process for the purification of the Hydrazine consists of passing the Hydrazine through moisture absorbing inert media until high purity levels are obtained. Once the purity is established, the "dry" Hydrazine gets transferred into small vessels filled with an inert dried solvent material which are then packaged and shipped using standard IATA and DOT dangerous goods shipping practices. The purified hydrazine is trademarked as Brute ® Hydrazine. Hazardous waste will be collected and properly disposed of by a licensed third-party company.

11. Surrounding land uses and setting:

The proposed parcel is zoned as ML-I-2-RE (Mesquite Lake Medium Industrial with a Renewable Energy Overlay), as identified on the Mesquite Lake Specific Plan, and is currently an undeveloped dirt parcel. The north side of the property abuts an ML-I-2-RE (Mesquite Lake Medium Industrial with a Renewable Energy Overlay) parcel containing a solar plant. The east of the property abuts Old Highway 111, and across the Highway 111, an undeveloped ML-I-2-RE (Mesquite Lake Medium Industrial with a Renewable Energy Overlay) parcel. The West side of the property abuts an

undeveloped dirt parcel zoned as ML-I-3-RE (Mesquite Lake Heavy Industrial with a Renewable Energy Overlay). Lastly, the South of the property abuts the Redwood lateral & Mesquite Lake Water and Power Plant within a parcel zoned as ML-I-3-RE.

12. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.): Planning Commission

13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

AB52 Opportunity to consult letters were sent to the Quechan and Campo Band of Mission Indians Tribes on October 02, 2024, and no comments have been received to date from either.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code, Section 21080.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code, Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code, Section 21082.3 (c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology /Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

After Review of the Initial Study, the Environmental Evaluation Committee has:

☐ Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ Found that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ Found that although the proposed project could have a significant effect on the environment, ~~because~~ all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EEC VOTES	YES	NO	ABSENT
PUBLIC WORKS	☐	☐	☐
ENVIRONMENTAL HEALTH SVCS	☐	☐	☐
OFFICE EMERGENCY SERVICES	☐	☐	☐
APCD	☐	☐	☐
AG	☐	☐	☐
SHERIFF DEPARTMENT	☐	☐	☐
ICPDS	☐	☐	☐

Jim Minnick, Director of Planning/EEC Chairman

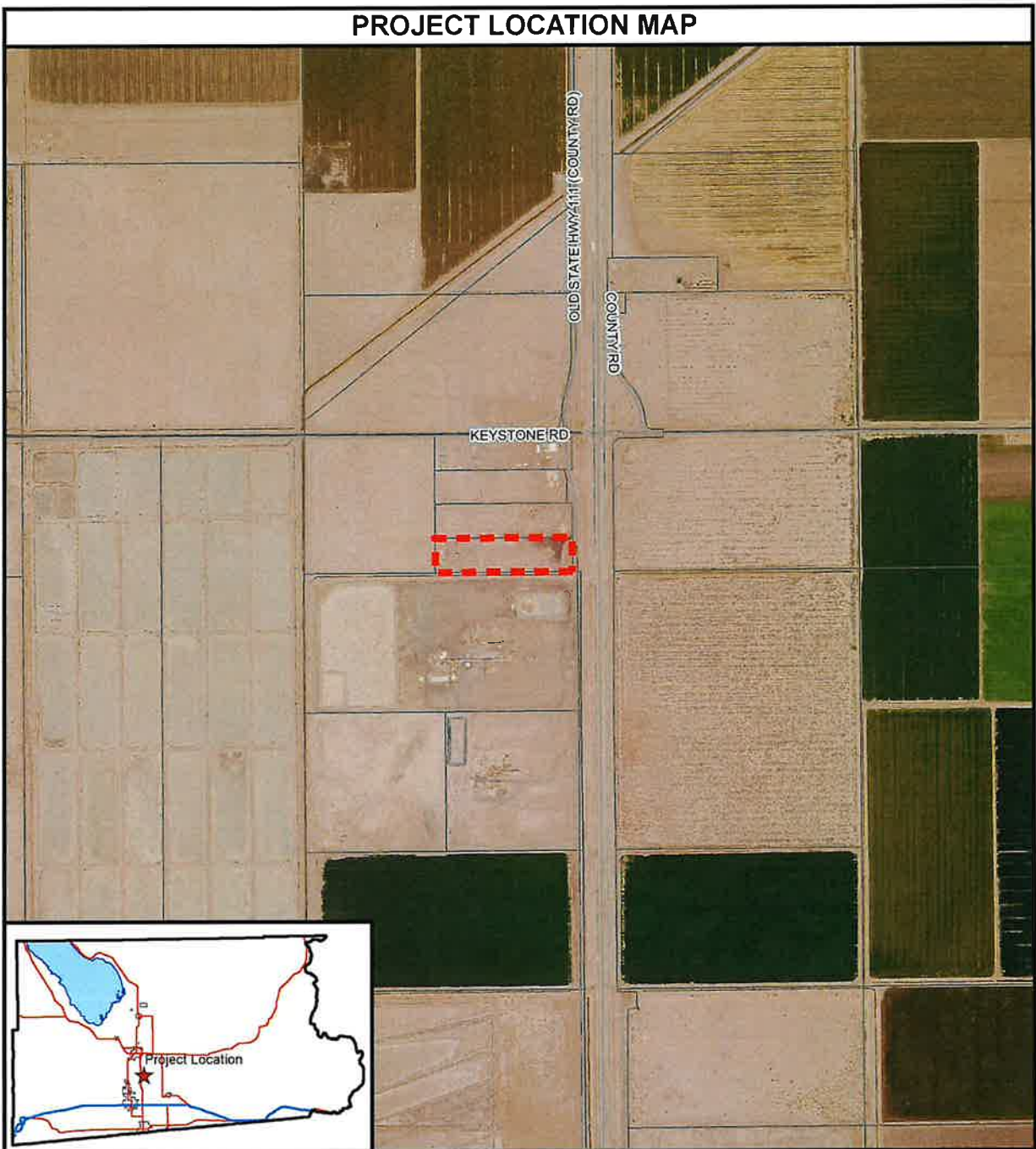
Date:

PROJECT SUMMARY

- A. **Project Location:** 3555 Old Highway 111, Imperial, CA 92251
- B. **Project Summary:** The applicant submitted a CUP application for a N2H4 (Hydrazine) processing facility, with Initial Study #24-0034. The facility will include storage metal containers with appropriate cabinets and containers for raw chemical materials and waste, detached from the main building and constructed to store chemicals safely. The proposed building will be a total of 7,000 sq. ft. This building will be a warehouse facility with an office, parking, and site improvements. The building will have a driveway access from Old Highway 111. This project will be located at property identified under Assessor's Parcel Number (APN) 040-250-024-000, within the Mesquite Lake Specific Plan area. A total of 4 to 12 employees will be working in the warehouse/office, with daily operating hours estimated to be from 7:00 am to 5:00 pm approximately.
- C. **Environmental Setting:** The project parcel is approximately 9.59 acres and is located on an empty lot on the western side of the Old Highway 111, at about 200 ft away from the State Highway SR-111. It is bordered by ML-I-2-RE (Mesquite Lake Medium Industrial with Renewable Energy Overlay) Zones on North and East and ML-I-3-RE (Mesquite Lake Heavy Industrial with Renewable Energy Overlay) on South and West sides of the proposed project.
- D. **Analysis:** The proposed project area is located within the County's General Plan designation of "Specific Plan Area" and is currently zoned ML-I-2-RE (Mesquite Lake Medium Industrial with Renewable Energy Overlay) and would be considered consistent with the Imperial County's General Plan, "the Mesquite Lake Specific Plan Area" under III. Development Regulations and Infrastructure; A. Land Use Plan, 2. MLI-2 (Mesquite Lake Medium Industrial), b. Uses Permitted with a Conditional Use Permit Only, under, (2) Manufacturing and Assembly, (a) Minimum Impact Heavy Manufacturing.
- E. **General Plan Consistency:** The project is located within the County's General Plan designation of "Specific Plan Area" and within the Mesquite Lake Specific Plan Area. The Project could be considered consistent with the General Plan and the County Land Use Ordinance upon the approval of the proposed Conditional Use Permit (CUP).

Exhibit "A"

Vicinity Map

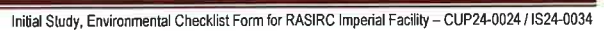


DUGGINS CONSTRUCTION
CUP #24-0024, IS #24-0034
040-250-024-000

-  Project Location
-  Centerline
-  Parcels



OLD HIGHWAY 77, IMPERIAL, CA. 92251



EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance

Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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I. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

- a) Have a substantial adverse effect on a scenic vista or scenic highway? ☐ ☐ ☐ ☒
- a) No recognized scenic vistas or officially designated State scenic highways are located near or are visible from the project area. The proposed project is located on the western side of the Old Highway 111, at about 200 ft away from the State Highway SR-111, which travels along the northeast shore of the Salton Sea and is eligible for future Scenic Highway Designation from Bombay Beach to the Northern County Line. This eligible section for a future Scenic Highway Designation of the State Highway SR-111 is located at about 33 miles from the proposed project site. Due to this significant distance, there is no substantial adverse effects on the potential scenic highway portion of the State Highway SR-111. Therefore, no impact is expected.**
- b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway? ☐ ☐ ☐ ☒
- b) The proposed project is located on an empty lot on the western side of the Old Highway 111, at about 200 ft away from the State Highway SR-111, which travels along the northeast shore of the Salton Sea and is eligible for future Scenic Highway Designation from Bombay Beach to the Northern County Line. This eligible section for a future Scenic Highway Designation of the State Highway SR-111 is located about 33 miles from the proposed project site. Additionally, the Salton Sea is more than 16 miles northwest of the site and the Chocolate Mountains are about 25 miles northeast from the project site. As mentioned above in I. (a), due to this significant distance and the absence of scenic resources (i.e., rock outcroppings, trees, or historic buildings), there are no substantial adverse effects on the potential scenic highway portion of the State Highway SR-111. Therefore, no impact is expected.**
- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surrounding? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? ☐ ☐ ☒ ☐
- c) The proposed project location belongs to the Mesquite Lake Specific Plan, and it's zoned as ML-I-2-RE (Mesquite Lake Medium Industrial with a Renewable Energy Overlay) as identified by the Mesquite Lake Specific Plan Map 14-A. The property to the north is also zoned as ML-I-2-RE (Mesquite Lake Medium Industrial with a Renewable Energy Overlay) and currently holds the operation of a photovoltaic energy generation project. The property towards East, across Highway 111, is zoned as ML-I-2-RE (Mesquite Lake Medium Industrial with Renewable Energy Overlay) and it is currently vacant land. Both properties towards West and South of the subject parcel are zoned as ML-I-3-RE (Mesquite Lake Heavy Industrial with a Renewable Energy Overlay), while the property towards West remains vacant, the property towards South holds the infrastructure of a biomass fuel power plant. The land on which the proposed project would be located is primary flat, vacant and undeveloped land located in an area zoned for industrial development. Additionally, the project will be subject to development standards related to the visual environment of the area, set forth in Chapter IV of the Mesquite Lake Specific Plan, these standards regulate visual elements such as landscaping, building design, signs, parking, fences, building heights, setbacks and lot area. The proposed project would change the visual character of the area from a vacant abandoned parcel to a 7,000 ft² chemical processing plant with a height of 19'-6". The existing visual quality of the area is low with no scenic vistas. The proposed project would enhance the aesthetic character of the region by developing a project consistent with the industrial type of uses envisioned for the area. Based on the information mentioned before, there won't be a substantial degrade on the existing visual character or quality of the site and its surroundings. Therefore, less than significant impacts are expected.**
- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ☐ ☐ ☒ ☐
- d) The proposed project appears to not have substantial light or glare which would adversely affect day or nighttime views in the area. The project will meet all landscaping standards, which will help offset the light and/or glare, as required on Section IV (B) Site and Design Standards from the Mesquite Lake Specific Plan. Additionally, all exterior lighting shall be shielded and directed away from adjacent properties and away from or shielded from public roads, as per Division 3, 90301.02 Development standards (Commercial & Industrial Zones) (K). Also, the project will be subject to a Design Review submitted to the Planning and Development Services Department, Therefore, less than significant impacts are expected.**

Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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II. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. --Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? ☐ ☐ ☐ ☒
- a) The proposed project location is zone ML-I-2-RE (Mesquite Lake Medium Industrial with Renewable Energy Overlay) as identified by the Mesquite Lake Specific Plan, pursuant to Imperial County Zone Map #14-A (Title9, §92514.03), and is not farmland, therefore, it would not be converting farmland to a non-agricultural use. No impacts are anticipated.**
- b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract? ☐ ☐ ☐ ☒
- b) The proposed project location is zone ML-I-2-RE (Mesquite Lake Medium Industrial with Renewable Energy Overlay) as identified by the Mesquite Lake Specific Plan, pursuant to Imperial County Zone Map #14-A (Title9, §92514.03). The proposed project location is not zoned for agricultural uses; therefore, it would not conflict with existing agricultural zoning or a Williamson Act contract. No impacts are anticipated.**
- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? ☐ ☐ ☐ ☒
- c) The proposed project location is zoned ML-I-2-RE (Mesquite Lake Medium Industrial with Renewable Energy Overlay) as identified by the Mesquite Lake Specific Plan, pursuant to Imperial County Zone Map #14-A (Title9, §92514.03) and would not conflict with existing forest land or cause re-zoning of existing forest land. No impacts are anticipated.**
- d) Result in the loss of forest land or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒
- d) The proposed project location is zoned ML-I-2-RE (Mesquite Lake Medium Industrial with Renewable Energy Overlay) as identified by the Mesquite Lake Specific Plan, pursuant to Imperial County Zone Map #14-A (Title9, §92514.03). The proposed project site would not result in the loss of forest land or conversion of forest land to non-forest use. No impacts are anticipated.**
- e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒
- e) The construction and operation of the Hydrazine processing facility would not cause changes to the existing environment resulting conversion of farmland to non-agricultural use or conversion of forest to non-forest use. Therefore, no Prime Farmland, Unique Farmland, Farmland of Statewide or local importance agricultural operations will be converted to non-agricultural or non-forest use. No impacts are anticipated.**

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to the following determinations. Would the Project:

- a) Conflict with or obstruct implementation of the applicable air quality plan? ☐ ☒ ☐ ☐
- a) The proposed project will implement equipment that consist in a closed loop process entirely within a ventilated environment connected to Control Equipment using Best Available Control Technology ("BACT") including high velocity exhaust system and carbon bed abatement. The Control Equipment is manufactured by CS Clean Solutions and is currently in use at a similar processing facility in Longmont, Colorado. The predominant emission from the equipment is nitrogen gas with small amounts of water vapor; however, as trace levels of hydrocarbons may also be present, Control Equipment using**

Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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activated carbon will be used to abate these contaminants. Processing rooms, walk-in fume hoods, and process glove boxes will be constantly vented to facility Control Equipment systems. Any equipment or emission unit that has the potential for hydrazine release will have detection monitors with Supervisory Control and Data Acquisition ("SCADA") connectivity to initiate the process shut down sequence and activate the area alarm system.

The proposed project will be required to adhere to the requirements of the Air Pollution Control District (APCD) and comply with APCD's rules and regulations. The Air Pollution Control District requests in their comment letter dated October 15, 2024⁷, an Air District Permit and an application for engineering review of the project, along with the design specifications and an HRA (Health Risk Assessment) as Hydrazine is identified by the U.S. Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (CARB) as a Hazardous Air Pollutant and Air Toxic Pollutant. Additionally, the project and any future construction must comply with all Air District rules and regulations with emphasis on Regulation VIII-Fugitive Dust Rules. Furthermore, it is expected that a less than significant impact would occur with the implementation of mitigation measure AQ-1.

MM AQ-1: The applicant must provide a Health Risk Assessment (HRA) referencing the current CEQA Air Quality Handbook for Imperial County. An Air District Permit and an application for engineering review of the project will need to be submitted along with the design specifications and the HRA for review by the Air Pollution Control District. Any relative humane exposure, location of the project, distance to sensitive receptors should be considered when developing the risk assessment.

- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? ☐ ☒ ☐ ☐
- b) It is expected that adherence to the requirements mentioned above in section III a) would prevent the project from resulting in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard during operation or construction of the proposed Hydrazine processing facility. Any impacts are considered to be less than significant with the implementation of mitigation measure AQ-1.**
- c) Expose sensitive receptors to substantial pollutants concentrations? ☐ ☒ ☐ ☐
- c) All hazardous chemicals and waste will be properly identified, stored, and controlled to requirements set forth by OSHA, GHS, Fire Code, NFPA, and any other applicable standards. Hazardous waste will be collected and properly disposed of by a licensed third-party service provider. All facility-generated hazardous waste will be accumulated in an external storage building in accordance with Title 22 from the California Code of Regulations (CCR), Division 4.5, Chapter 12, Section 66262.16 "Small Quantity Generator". Adherence to these standards and the implementation of the Control Equipment mentioned above in section III a) along with the mitigation measure AQ-1, would prevent the exposure of sensitive receptors to substantial pollutants concentrations, therefore a less than significant impact would be expected, considering the implementation of mitigation measure AQ-1.**
- d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)? ☐ ☒ ☐ ☐
- d) As mentioned in section III a), the project proposes a closed loop process, entirely within a ventilated environment connected to a Control Equipment using Best Available Control Technology ("BACT") including high velocity exhaust systems and carbon bed abatement. The Control Equipment is manufactured by CS Clean Solutions and is currently in use at a similar processing facility in Longmont Colorado. The predominant emission from the equipment is nitrogen gas with small amounts of water vapor; however, as trace levels of hydrocarbons may also be present, Control Equipment using activated carbon will be used to abate these contaminants. Processing rooms, walk-in fume hoods, and process glove boxes will be constantly vented to facility Control Equipment systems. Any equipment or emission unit that has the potential for hydrazine release will have detection monitors with Supervisory Control and Data Acquisition ("SCADA") connectivity to initiate the process shut down sequence and activate the area alarm system. Adherence to the requirements mentioned in section II a) and the compliance with the Air Pollution Control District rules and regulations, along with the implementation of mitigation measure AQ-1, will mitigate the emissions leading to odors adversely affecting a substantial number of people, leading to a less than significant impact.**

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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IV. **BIOLOGICAL RESOURCES** *Would the project:*

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

☐ ☒ ☐ ☐

a) Although the California Department of Fish and Wildlife Lands Viewer^a identifies a distribution model and predicted habitat for the Burrowing Owl within the proposed project area and its surroundings, the proposed project does not expect to cause any physical changes to the environment due to its established land designation as Industrial within the Mesquite Lake Specific Plan and the existing development surrounding the property, including a solar farm and a power plant. However, the Mesquite Lake Specific Plan includes established mitigation measures in its Master Environmental Impact Report³⁸ to address potential impacts to Burrowing Owls, which will be strictly followed. Considering the current land conditions and the implementation of mitigation measure BIO-1, the project is anticipated to result in a less than significant impact with mitigation incorporated.

MM BIO-1: Prior to grading or construction, an initial survey to determine the presence of burrowing owls shall be conducted between February and September by a biologist that has been determined by the USFWS as qualified to conduct burrowing owl surveys. The survey shall be conducted in accordance with the latest USFWS-approved guidelines. A report on the results of the survey and recommended avoidance or mitigation measures shall be provided by the applicant to the USFWS, CDFW, and Imperial County Planning and Development Services Department. No clearing or ground-disturbing activities may be taken until the report and recommendations have been accepted by the USFWS, CDFW, and Imperial County Planning and Development Services Department. All burrowing owls found on the project site shall be tagged by USFWS-qualified burrowing owl biologist.

If burrowing owl burrows are found present within construction areas and a 50-meter (165-foot) boundary of construction limits, avoidance is the preferred level of mitigation. If avoidance cannot be met, or no burrowing owls were detected during the first survey, a second survey shall be conducted no less than 30 days prior to any clearing, ground disturbance, or demolition of existing structures. If no burrowing owls are present, a third survey shall be conducted no less than five days prior to the commencement of construction and, if no burrowing owls are present, clearing, grading, demolition, or construction may commence. If burrowing owls were present at the time of the second survey and CDFW and USFWS Office of Law Enforcement concur, on-site passive relocation can be implemented. The project biologist shall evaluate the suitability of nearby habitat, the availability of an existing or constructed alternate burrow for each burrow excavated, and the opportunity for preservation of the site, such as through a conservation easement that would be managed to promote burrowing owl use of the site. Relocation requires that owls should be excluded from burrows in the immediate impact zone and 50-meter buffer zone by installing one-way doors in burrow entrances, left in place for 48 hours before excavation. Relocation of owls should only be implemented during the nonbreeding season.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

☐ ☐ ☒ ☐

b) As outlined in earlier sections of this document, the proposed project is situated within the boundaries of the Mesquite Lake Specific Plan. The subject parcel is zoned as ML-I-2-RE, which stands for *Mesquite Lake Medium Industrial with Renewable Energy Overlay*. This zoning designation is specifically intended to accommodate medium industrial uses while promoting the integration of renewable energy projects, in line with the broader development goals of the Mesquite Lake area.

The current physical conditions of the subject parcel are characterized by an undeveloped portion of land, with the entire area consisting of compacted dirt. No water bodies, riparian habitats, or other environmentally sensitive natural communities are present within the boundaries of the parcel that would require special consideration or mitigation measures.

In conclusion, the existing conditions of the parcel and its zoning compatibility with industrial uses support the determination that the proposed project will lead to a less than significant impact.

- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

☐ ☐ ☒ ☐

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
c) The proposed project location is zoned ML-I-2-RE (Mesquite Lake Medium Industrial with Renewable Energy Overlay) ; in accordance to the Mesquite Lake Specific Plan, the physical conditions of Mesquite Lake's former natural environment results in the potential presence of biological resources associated with wetlands along the drainage swales and natural depressions in portions of the site. While these areas are highly altered by agricultural operations and degraded by off-road vehicle activity, potential wetland areas may, nonetheless, be regulated by State and federal agencies. Additionally, based on the Conservation & Open Space Element from the Imperial County General Plan, Figure 1, the project site does not appear to be in a USFWS National Wetland Inventory identified area. The applicant must adhere to any applicable state and/or federal requirements for this project; consequently, a less than significant impact is expected.				
d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
d) The proposed project is located on an empty parcel surrounded by development on adjacent parcels towards North and South, amongst which we find a ground installed solar field towards north and a power plant towards south. Active traffic is also occurring on the eastern side of the property from both the Old Highway 111 and the State Highway 111. Therefore, it is not anticipated that the project would substantially interfere with the movement of any resident or migratory fish or wildlife corridors or impede the use of native wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Any impact would be considered less than significant.				
e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
e) As previously stated in this section the proposed project is located on an empty parcel consisting of compacted dirt, surrounded by development towards North and South. It is not expected that the project will conflict with any local policies or ordinance protecting biological resources, such as a tree preservation policy or ordinance. Any impact would be considered less than significant.				
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐
f) As previously stated in this section the proposed project is located on an empty parcel consisting of compacted dirt, surrounded by development towards North and South. It is not expected that the project will conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Any impact would be considered less than significant.				

V. **CULTURAL RESOURCES** *Would the project:*

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? | ☐ | ☐ | ☒ | ☐ |
| a) The project site is located in an area identified by the Imperial County General Plan as part of the Mesquite Lake Specific Plan and zoned as ML-I-2-RE (Mesquite Lake Medium Industrial with Renewable Energy Overlay). The proposed project area is an empty lot surrounded by parcels with existing development and disturbance on the land. Additionally, consultation to the Quechan Tribe and the Campo Band was performed pursuant to AB52 and no response or concern was received from the consulted parties, therefore, a less than significant impact is expected on historical resources. | | | | |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | ☐ | ☐ | ☒ | ☐ |
| b) The project site is located in an area identified by the Imperial County General Plan as part of the Mesquite Lake Specific Plan and zoned as ML-I-2-RE (Mesquite Lake Medium Industrial with Renewable Energy Overlay). The proposed project area is an empty lot surrounded by parcels with existing development and disturbance on the land. Additionally, according to Mesquite Lake Specific Plan, Chapter II, Section D "Environmental Resources", Item 2 "Cultural Resources" ³⁷ , no substantial archaeological deposits are expected in the Mesquite Lake area due to the absence of historical records of permanent Kamia villages in the area, therefore, a less than significant impact is expected on archeological resources. | | | | |
| c) Disturb any human remains, including those interred outside of dedicated cemeteries? | ☐ | ☐ | ☒ | ☐ |
| c) As previously mentioned in items (V)(a) and (V)(b) above, the project site is located in an area identified by the Imperial County General Plan as part of the Mesquite Lake Specific Plan and zoned as ML-I-2-RE (Mesquite Lake Medium Industrial | | | | |

Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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with Renewable Energy Overlay). The proposed project area is an empty lot surrounded by parcels with existing development and disturbance on the land. Additionally, according to Mesquite Lake Specific Plan, Chapter II, Section D "Environmental Resources", Item 2 "Cultural Resources", no substantial archaeological deposits are expected in the Mesquite Lake area due to the absence of historical records of permanent Kamia villages in the area, therefore, the project would not disturb any human remains, including those interred outside of dedicated cemeteries. Any impacts are expected to be less than significant.

VI. **ENERGY** *Would the project:*

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? ☐ ☐ ☒ ☐
- a) The proposed project is for a 7,000 sq. ft. N2H4 (Hydrazine) processing facility, with a warehouse and office space. Operations will be conducted during normal business hours from 7 am to 5 pm daily by employees trained and proficient in facilities and safety management, production operations, and process control. The facility will be in a secure environment with a badge access-controlled building inside a fenced enclosure with gated entry, which does not include nor contemplate the wasteful, inefficient, or unnecessary consumption of energy resources. Additionally, per comment letter received from the Imperial Irrigation District (IID) dated October 3rd, 2024¹⁴, electrical capacity is limited in the project area and a circuit study may be required. Any system improvements or mitigation identified in the circuit study to enable the provision of electrical service to the project shall be the financial responsibility of the applicant. Also, if and when the project needs electrical service, the applicant should be advised to contact IID. Adherence to IID's standards, regulations, and recommendations would bring any impacts to less than significant.**
- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? ☐ ☐ ☒ ☐

b) As mentioned above on (VI)(a) the proposed project is for a new 7,000 sq. ft. N2H4 (Hydrazine) processing facility, with a warehouse and office space. The new construction must adhere to the 2022 Energy Code which encourages efficient electric systems for new buildings. On a separate note, there's existing development on the north and south portion of the proposed site that falls under the permitted uses under the Mesquite Lake SPA for parcels designated as Industrial; therefore, the proposed project would not obstruct a state or local plan for renewable energy or energy efficiency. Additionally, as previously mentioned on item (VI)(a), the applicant would adhere and comply with IID's standards, regulations, and recommendations. Any impacts are expected to be less than significant.

VII. **GEOLOGY AND SOILS** *Would the project:*

- a) Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving: ☐ ☐ ☒ ☐
- a) The proposed development does not conflict with the geology and soil of on-site or adjacent properties, and it does not expose people or structures to potential adverse effects, including risk of loss injury or death. Therefore, a less than significant impact is expected.**
- 1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42? ☐ ☐ ☒ ☐
- 1) A review of the current Alquist-Priolo Earthquake Fault Zone maps (CGS, 2000a)¹⁵ indicates that the nearest mapped Earthquake Fault is the Brawley Seismic Zone Fault +/-1.5 miles towards East and the Imperial Fault towards +/-1.5 miles towards West from the project location, therefore, it is not expected to directly or indirectly cause potential substantial adverse effects, including risk of loss, injury or death involving the rupture of a known earthquake fault. Impacts are expected to be less than significant.**
- 2) Strong Seismic ground shaking? ☐ ☐ ☒ ☐
- 2) Ground shaking is expected as the project is located in the seismically active Imperial Valley with numerous mapped faults of San Andreas Fault System traversing the region. The project site is an empty parcel surrounded by existing development towards north and south, amongst which we find a ground installed solar field towards north and a power plant towards south which have existing structures that have been in place for many years. The structures composing the proposed Hydrazine processing facility will be required to comply with the current California Building Codes at the time of permitting and construction. Therefore, any impacts are anticipated to be less than significant.**

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
3) Seismic-related ground failure, including liquefaction and seiche/tsunami? 3) The proposed Hydrazine processing facility will be located within the boundaries of an empty lot, surrounded by existing development towards north and south, amongst which we find a ground installed solar field towards north and a power plant towards south. Due to the development that has been present in the neighboring parcels for several years, it does not appear that the project is on a geologic unit or soil that is unstable or that would become unstable as a result of seismic activities, including liquefaction or seiche/tsunami. Less than significant impacts are expected.	☐	☐	☒	☐
4) Landslides? 4) According to the Imperial County General Plan Landslides Activity Map, Figure 2²², Seismic and Public Safety Element, the project site does not lie within a landslide activity area and therefore, no impacts are anticipated.	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil? b) As stated above in VII-a3, the proposed project location is an empty parcel consisting of compacted dirt that neighbors developed parcels, which have structures within that have been in place for several years. Therefore, it is not anticipated that the project would result in substantial soil erosion or the loss of topsoil. Any impact would be considered less than significant.	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse? c) As stated in VII-a3, the proposed project location is an empty parcel consisting of compacted dirt that neighbors developed parcel, which have structures within that have been in place for several years and does not appear to be located on a geologic unit or soil that is unstable as a result of the project and would not potentially result in on-or off-site landslides, lateral spreading, substance, liquefaction or collapse. Additionally, as stated in VII-a4, the project is not located in an area that is subject to landslides. Therefore, any impact would be considered less than significant.	☐	☐	☒	☐
d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life or property? d) As stated before in this section the proposed project location is an empty parcel consisting of compacted dirt with neighboring parcels that have had existing structures on them for several years. Any new development on the project location will be required to conform to the latest California Building Code. Therefore, it is not expected that the project would be located on expansive soil which would create a substantial direct or indirect risk to life or property and any impacts would be considered less than significant.	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? e) The proposed project parcel is situated near to properties to the north, within less than 600 feet, which currently rely on septic systems for wastewater management. In line with the development plans, a septic system is also being proposed for this property, designed to meet or exceed the standards outlined in the California Building Code as well as the specific requirements set forth by the Imperial County Environmental Health Services (EHS). Based on this information, it is anticipated that the possibility of an impact due to the inability of the soil to support the use of septic tanks or alternative wastewater disposal systems will be less than significant.	☐	☐	☒	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? f) The proposed Hydrazine processing facility will be located within the boundaries of an empty parcel consisting of compacted dirt. The project will be located on a +/- 9.59 Acres area that neighbors existing development including a power plant and a ground installed solar field. The project will have concrete foundations poured to the ground and will be designed and built up to the California Building Code. The existence of development on neighboring parcels indicates that the possibility of an impact on unique paleontological resources and or unique geologic feature would be less than significant.	☐	☐	☒	☐

VIII. **GREENHOUSE GAS EMISSION** *Would the project:*

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or | ☐ | ☐ | ☒ | ☐ |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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indirectly, that may have a significant impact on the environment?

a) The proposed RASIRC Hydrazine Processing Facility will conduct normal business hours between 7 am and 5 pm with most employees working a typical 8-hour day. Initially, the number of employees on site will be 5 and the most employees expected to be working in the future will be 12. RASIRC products are sold to Semiconductor manufacturers and are usually sold through distributors or directly through a RASIRC office in San Diego. Customers will not visit the site for purposes of sales or inquiry. There will be no customer traffic at this location. Vehicle traffic would consist of weekday commuting of employees and infrequent shipments and deliveries of goods. During the start-up phase, traffic will potentially be greater as the equipment for the plant operation will be delivered, qualified and placed into service. There will also be visits from the San Diego facility to ensure facility startup and operational readiness. It is expected that the number of vehicles on site would be proportional to the number of employees. RASIRC does not have any fleet vehicles or machinery other than a forklift for shipping and receiving purposes. Based on this information, impacts are expected to be less than significant.

- b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? ☐ ☐ ☒ ☐

b) The proposed RASIRC Hydrazine Processing Facility is not expected to conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The proposed project will be required to adhere to the requirements of the Air Pollution Control District (APCD) and comply with APCD's rules and regulations. Any impacts are expected to be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS *Would the project:*

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? ☐ ☐ ☒ ☐

a) All hazardous chemicals and waste will be properly identified, stored, and controlled to requirements set forth by OSHA, GHS, Fire Code, NFPA, and any other applicable standards. Hazardous waste will be collected and properly disposed of by a licensed third-party service provider. All facility-generated hazardous waste will be accumulated in an external storage building in accordance with Title 22 from the California Code of Regulations (CCR), Division 4.5, Chapter 12, Section 66262.16 "Small Quantity Generator". Adherence to these standards and the implementation of the Control Equipment mentioned above in section III a), along with the mitigation measure AQ-1, would prevent the creation of a significant hazard to the public or the environment, therefore a less than significant impact would be expected.

- b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment? ☐ ☐ ☒ ☐

b) As mentioned above in section IX a), hazardous waste will be collected and properly disposed of by a licensed third-party service provider. All facility-generated hazardous waste will be accumulated in an external storage building in accordance with Title 22 from the California Code of Regulations (CCR), Division 4.5, Chapter 12, Section 66262.16 "Small Quantity Generator". The proposed project will implement equipment that consist in a closed loop process entirely within a ventilated environment connected to Control Equipment using Best Available Control Technology ("BACT") including high velocity exhaust system and carbon bed abatement. The Control Equipment is manufactured by CS Clean Solutions and is currently in use at a similar processing facility in Longmont, Colorado. The predominant emission from the equipment is nitrogen gas with small amounts of water vapor; however, as trace levels of hydrocarbons may also be present, Control Equipment using activated carbon will be used to abate these contaminants. Processing rooms, walk-in fume hoods, and process glove boxes will be constantly vented to facility Control Equipment systems. Any equipment or emission unit that has the potential for hydrazine release will have detection monitors with Supervisory Control and Data Acquisition ("SCADA") connectivity to initiate the process shut down sequence and activate the area alarm system. Adherence to these standards and procedures would prevent the creation of any significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment, therefore a less than significant impact would be expected.

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? ☐ ☐ ☐ ☒

c) The proposed project is not located near any schools. The closest school is Miguel Hidalgo Elementary School, located in the City of Brawley, approximately 4.5 Miles North of the proposed project site. Therefore, no impact would be expected.

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? d) The proposed project site is not listed as a hazardous materials site pursuant to Government Code, Section 65962.5. The proposed project site is currently an empty parcel consisting of compacted dirt, there are no hazardous materials on-site. Therefore, no impact would be expected.	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? e) The proposed project is not located within any airport zone in the Airport Land Use Compatibility Plan. Therefore, the project is not expected to create an aircraft hazard for people in the proposed project area. The closest airport is Brawley municipal airport approximately 5.5 miles North of the proposed project site. Therefore, no impact would be expected.	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? f) The proposed project is located within the Mesquite Lake Specific Plan with access from the Old State Highway 111 and is not expected to impair implementation of or physically interfere with an adopted emergency plan or emergency evacuation plan. Less than significant impacts are expected.	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? g) The proposed project is not expected to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires as the project is not located in an area prone to or susceptible to wildland fires. Therefore, impacts are considered less than significant.	☐	☐	☒	☐

X. HYDROLOGY AND WATER QUALITY *Would the project:*

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) | Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
a) The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Additionally, as per the comment letter received from the Imperial Irrigation District (IID) dated October 3rd, 2024¹⁴, to properly assess the impacts to IID water facilities, the applicant should submit project plans, including grading & drainage and fencing plans, to IID Water Department Engineering Services for review and comment prior to final project design approval. Therefore, a less than significant impact is expected. | ☐ | ☐ | ☒ | ☐ |
| b) | Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
b) The project proposes using water supplied by the IID to an onsite water tank located near the 7,000 sq. ft. facility. No decrease on groundwater supplies or interference with groundwater recharge that would impede sustainable groundwater management is anticipated. Nonetheless, per the comment letter received from the Imperial Irrigation District (IID) dated October 3rd, 2024¹⁴, to properly assess the impacts to IID water facilities, the applicant should submit project plans, including grading & drainage and fencing plans, to IID Water Department Engineering Services for review and comment prior to final project design approval. Therefore, by following these requirements, a less than significant impact is expected. | ☐ | ☐ | ☒ | ☐ |
| c) | Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

c) The proposed Hydrazine processing facility will be located within the Mesquite Lake Specific Plan in an Industrial designated parcel, surrounded by existing development including a solar farm towards North and an energy plant towards | ☐ | ☐ | ☒ | ☐ |

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
South. The proposed facilities will be located on the eastern portion of a +/- 9.59 Acres parcel that is currently compacted dirt but will be covered in concrete foundations where the 7,000 sq. ft. facilities will be located, the construction of such development will require a building permit. The applicant should submit project plans, including grading & drainage and fencing plans, to the IID Water Department Engineering Services for review and comment prior to final project design approval. The review of such project plans will prevent any adverse effect, therefore, it is not expected that the project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces. Any impact would be considered less than significant.				
(i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
i) The proposed Hydrazine processing facility will be located within the boundaries of the Mesquite Lake Specific Plan in Industrial designated parcel surrounded by existing development. The project is not anticipated to result in substantial erosion or siltation on- or off-site. Any impact would be considered less than significant				
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
ii) The proposed Hydrazine processing facility will be located within the boundaries of the Mesquite Lake Specific Plan in Industrial designated parcel surrounded by existing development. A retention basin will be incorporated on the eastern side of the property. Building and grading permits will be required for the development of the project to assess and prevent any potential impacts. Therefore, the project is not anticipated to result in substantial increase of the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Any impact would be considered less than significant.				
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or;	☐	☐	☒	☐
iii) It is not expected or anticipated that the proposed Hydrazine processing facility would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage system or provide substantial sources of polluted runoff. Additionally, a retention basin will be part of the development as shown in the proposed site plan. Any impact would be considered less than significant.				
(iv) impede or redirect flood flows?	☐	☐	☒	☐
iv) The proposed Hydrazine processing facility will require a building permit application and grading plans that will be reviewed to assess and prevent any potential impact. As stated before, a retention basin will be part of the proposed development as shown in the proposed site plan. Any impact would be considered less than significant.				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
d) The proposed Hydrazine processing facility is not located in a flood hazard, tsunami, or seiche zones and therefore, is not expected to risk release of pollutants due to project inundation. Any impact would be considered less than significant.				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐
e) The proposed Hydrazine processing facility is not anticipated to conflict with or obstruct implementation of water quality control plan or sustainable groundwater management plan. Any impact would be considered less than significant.				

XI. LAND USE AND PLANNING Would the project:

- a) Physically divide an established community? ☐ ☐ ☐ ☒
- a) The project site is located in an area identified by the Imperial County General Plan as part of the Mesquite Lake Specific Plan which proposes development primarily with light, medium, and heavy industrial uses, and the site for the propose**

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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project is zoned as ML-I-2-RE (Mesquite Lake Medium Industrial with Renewable Energy Overlay) currently surrounded by Industrial and Agricultural zones and it will no physically divide established community. No impacts are anticipated.

- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ☐ | ☐ | ☐ | ☒ |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
- b) As previously mentioned in XI a) The project site is located in an area identified by the Imperial County General Plan as part of the Mesquite Lake Specific Plan; The project is consistent with the County's General Plan Land Use Element and the Land Use Ordinance with the approval of a Conditional Use Permit. The proposed project does not conflict with any applicable land use plan, policy and regulation. No impacts are anticipated.

XII. MINERAL RESOURCES *Would the project:*

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ☐ | ☐ | ☐ | ☒ |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
- a) The proposed project site is not located in an area classified to be a regionally important mineral resource per the California Department of Conservation-Mineral Land Classification³⁶. Therefore, no impacts are anticipated.
- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ☐ | ☐ | ☐ | ☒ |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
- b) Per the Imperial County General Plan, Conservation and Open Space Element, Figure 8: Existing Mineral Resources, the proposed project site is not located within an area known to be classified as a regionally important mineral resources. Therefore, it is not expected that the proposed project would result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, no impact is expected.

XIII. NOISE *Would the project result in:*

- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| ☐ | ☐ | ☒ | ☐ |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
- a) Noise associated with the construction of the proposed project will be temporary, short-term, and intermittent in nature. Construction activities and associated noise will be limited to the time frames specified in the Imperial County Noise Element and Land Use Ordinance Division 7: Noise Abatement and Control, which states that construction noises from a single piece of equipment or a combination of equipment not exceed 75 decibels of hourly average noise data, when averaged over an 8 hour period and when measured at the nearest sensitive receptor; therefore, the impact is expected to be less than significant.
- b) Generation of excessive groundborne vibration or groundborne noise levels?
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| ☐ | ☐ | ☒ | ☐ |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
- b) No major vibration-including activities, such as pile driving or blasting, will be conducted at the project facility. Some equipment may cause minor noise and vibration; however, no major vibrations or noises are expected, therefore the impact is expected to be less than significant.
- c) For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ☐ | ☐ | ☐ | ☒ |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
- c) The proposed project site is not located within the vicinity of a private airstrip or within the Compatibility Map of the Imperial Valley Airport per the Imperial County Airport Land Use Compatibility Plan; therefore, no impact is expected that would expose people in the project area to excessive noise levels.

XIV. POPULATION AND HOUSING *Would the project:*

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)? a) The proposed project does not include any housing or public infrastructure that may include substantial unplanned population growth in an area either directly or indirectly. Therefore, no impact is expected.	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? b) The proposed project will be located within a currently empty lot zoned ML-I-2-RE (Mesquite Lake Medium Industrial with a Renewable Energy Overlay), there will be no displacement of housing. Therefore, no impact is expected.	☐	☐	☐	☒

XV. PUBLIC SERVICES

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
- a) The proposed project is not expected to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services. It is expected that compliance with Imperial County Fire Department requirements per letter dated October 24, 2024³⁵, would lessen any public service impacts to less than significant levels.**
- 1) Fire Protection? ☐ ☐ ☒ ☐
1) The proposed Hydrazine processing facility is not expected to create a substantial adverse impact to fire protection. Impacts are expected to be less than significant. The applicant shall comply with Imperial County Fire Department requirements per letter dated October 24, 2024³⁵, to lessen any impact to less than significant levels.
- 2) Police Protection? ☐ ☐ ☒ ☐
2) The proposed Hydrazine processing facility is not expected to create a substantial adverse impact to police protection. Impacts are expected to be less than significant.
- 3) Schools? ☐ ☐ ☐ ☒
3) The proposed Hydrazine processing facility does not expect an increment in population that would require the construction of new educational facilities; therefore, no impacts are anticipated.
- 4) Parks? ☐ ☐ ☐ ☒
4) The proposed Hydrazine processing facility would not result in a substantially adverse physical impact to existing parks. No impacts are anticipated.
- 5) Other Public Facilities? ☐ ☐ ☒ ☐
5) The proposed project is not expected to result in a demand for other public facilities services. As such, implementation of the proposed project would not adversely affect other public facilities or require the construction of new or modified public facilities. Less than significant impacts are anticipated.

XVI. RECREATION

- a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
a) The proposed project consists of a N2H4 (Hydrazine) processing facility within the Mesquite Lake SPA. The facility will include storage metal containers with appropriate cabinets and containers for raw chemical materials and waste, detached

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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from the main building and constructed to store chemicals safely. The proposed building will be a total of 7,000 sq. ft. This building will be a warehouse facility with an office, parking, and site improvements. The building will have a driveway access from Old Highway 111. Additionally, there are no existing neighborhoods or regional parks within the proposed project area. The project is located on Mesquite Lake Specific Plan Area, which is designated for development primarily with light, medium, and heavy industrial uses; therefore, the proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. No impacts are expected.

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment? ☐ ☐ ☐ ☒

b) The proposed project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment. Also, as previously stated on item (XVI)(a), there are no regional parks within the proposed project area; therefore, no impacts are expected.

XVII. TRANSPORTATION *Would the project:*

- a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? ☐ ☐ ☒ ☐

a) Vehicle traffic would consist of weekday commuting of employees and infrequent shipments and deliveries of goods, approximately 5-10 times a month. During the start-up phase, traffic will potentially be greater as the equipment for the plant operation will be delivered, qualified and placed into service. There will also be visits from a San Diego facility to ensure facility startup and operational readiness. It is expected that the number of vehicles on site will be proportional to the number of employees, which volume is expected to be from 4 to 12 employees. RASIRC does not have any fleet vehicles or machinery other than a forklift for shipping and receiving purposes. Nonetheless, as stated in a received comment letter, submitted by the Imperial County Department of Public Works dated February 24, 2025²⁸, a trip generation and distribution analysis report shall be prepared by a traffic engineer licensed in the State of California and submitted to the Department of Public Works for review and approval. Existing traffic counts on Old Highway 111 south of Keystone Road and Keystone Road West of Old Highway 111 shall be obtained and included in the analysis report. The analysis report shall include fair share calculations related to the project's traffic impacts within the Mesquite Lake Specific Plan Area. The applicant shall be responsible for the fair share contribution identified on this report. The trip generation and distribution analysis report shall be submitted to this Department prior to issuance of any Building Permit. The fair share contribution shall be paid to the Department of Public Works prior to the issuance of the Certificate of Occupancy. By abiding to these requirements, we can expect a less than significant impact.

- b) Would the project conflict or be inconsistent with the CEQA Guidelines section 15064.3, subdivision (b)? ☐ ☐ ☒ ☐

b) The proposed Hydrazine processing facility is located along Old Highway 111 which is designated as a County maintained road, said project would be located approximately 1000 ft south from the intersection between E Keystone Rd and the State Highway 111, which runs from South to North and vice versa, approximately 200 ft east of the proposed project site. As stated before on item XVII-a), the applicant will have to comply with the requirements set forth by the Department of Public Works to address any potential impact. It does not appear that the project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Based on the information mentioned above, any impact would be considered less than significant.

- c) Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ☐ ☐ ☒ ☐

c) The proposed Hydrazine processing facility does not appear to substantially increase hazards due to a geometric design feature or incompatible uses. Any impact would be considered less than significant.

- d) Result in inadequate emergency access? ☐ ☐ ☒ ☐

d) The project is not expected to result in inadequate emergency access but will need to comply with any requirements from imperial County Fire Department regarding emergency access, as specified in their provided comment letter dated October 24, 2024³⁵. Any impact would be considered less than significant.

Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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XVIII. TRIBAL CULTURAL RESOURCES

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is:

☐	☐	☒	☐
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- a) According to the Imperial County General Plan's Conservation and Open Space Element, Figure 6⁸, the proposed project site is not located within any known Native American cultural sensitivity area. Additionally, as previously discussed in section (V)(a) above, the Quechan and Campo Band of Mission Indian Tribes have requested to be consulted under Assembly Bill 52. Consultation letters were sent to the Quechan and Campo Band of Mission Indian Tribes on October 02, 2024. On October 03, 2024, the County received a no comments email from the Yuma Quechan Indian Tribe in reference to the proposed project. No comments have been received from the Campo Band of Mission Indians Tribe for this project to this date. Therefore, less than significant impacts are expected.

- (i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as define in Public Resources Code Section 5020.1(k), or

☐	☐	☒	☐
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(i) According to the California Historic Resources³ in Imperial County, the proposed project site is not listed or seem to be eligible under the Public Resources Code Section 21074 or 5020.1 (k); therefore, any impacts are expected to be less than significant.

- (ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth is subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

☐	☐	☒	☐
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(ii) No significant resources listed as defined in the Public Resources Code Section 5024.1 are expected to be impacted by the proposed project. Additionally, as previously discussed in item (XVIII)(a) above, AB 52 Consultation letters were sent to the Quechan and Campo Band of Mission Indian Tribes on October 02, 2024. On October 03, 2024, the County received a no comments email from the Quechan Indian Tribe in reference to the proposed project. No comments have been received from the Campo Band of Mission Indians Tribe for this project to this date. Less than significant impacts are expected.

XIX. UTILITIES AND SERVICE SYSTEMS *Would the project:*

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?

☐	☐	☒	☐
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a) The project proposes an on-site septic system with future leach field reserved on the western side of the property and a retention basin area on the eastern side. Water would be supplied by the IID to the proposed facility. Additionally, as per the comment letter received from the Imperial Irrigation District (IID) dated October 3rd, 2024¹⁴, to properly assess the impacts to IID water facilities, applicants should submit project plans, including grading & drainage and fencing plans, to IID Water Department Engineering Services for review and comment prior to final project design approval. This same letter states that as electrical capacity is limited in the project area, a circuit study may be required. Any system improvements or mitigation identified in the circuit study to enable the provision of electrical service to the project shall be the financial responsibility of the applicant. The applicant will have to meet the requirements set forth by the IID in the comment letter mentioned before and follow the established procedures to obtain services to the project location. The project does not propose at this point new or upgrades to any of these systems nor does the project require or will result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction of which could cause significant environmental effects. Any impact would be considered less than

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
significant.				
b) Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years? b) The project would receive water from the IID and appear to have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years. Nonetheless, the applicant will have to meet the requirements set forth by the Imperial Irrigation District in its comment letter dated October 3rd, 2024¹⁴ and assess any potential impact. Any impacts are expected to be less than significant.	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? c) The project proposes an on-site septic system with future leach field reserved on the western side of the property and a retention basin area on the eastern side. It does not appear to have an impact on any wastewater treatment provider. Therefore, less than significant impacts are expected.	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? d) The proposed project does not appear to generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Any impacts are expected to be less than significant.	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? e) The project will be required to comply with all federal, state and local management and reduction statutes and regulations related to solid waste. Any impacts are expected to be less than significant.	☐	☐	☒	☐

XX. **WILDFIRE**

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☒ | ☐ |
| <p>a) The proposed Hydrazine processing facility is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and it is designated as a Local Responsibility Area (LRA) zone per the California Department of Forestry and Fire Projection Map for Imperial County Draft Fire Hazard Draft Severity Zones in LRA. Additionally, Fire Department access and access roads shall be in accordance with the California Fire Code Chapter 5, with a width of at least 20 feet and all-weather surface capable of supporting fire apparatus. Fire Department access roads will be provided with a turn around approved by Imperial County Fire Department; as well as an approved fire safety and evacuation plan shall be developed and approved by the Fire Department. The evacuation plan shall be in accordance with California Fire Code Chapter 4. As mentioned in the Imperial County Fire Department comment letter dated October 24, 2024³⁵. Compliance with the Imperial County Fire Department would bring any impact to be considered less than significant.</p> | | | | |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | ☐ | ☐ | ☒ | ☐ |
| <p>b) The proposed Hydrazine processing facility is in an overall flat terrain, additionally all buildings and structures shall comply with the Imperial County Fire Department regulations, as mentioned in the Imperial County Fire Department comment letter dated October 24, 2024³⁵, which states that prevention measures and suppression systems must be incorporated to all required structures. The applicant would be subject to the Imperial County Fire Department requirements to ensure that any impacts related to wildfire risks exposing project occupants to pollutant concentrations from a wildfire would be less than significant.</p> | | | | |

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
c) A route of access will be required to support safety and emergency response vehicles in all-weather situations; additionally, as mentioned in the Imperial County Fire Department comment letter dated October 24, 2024³⁵, per California Fire Code Chapter 5, section 503, there shall be at least two points of entry provided onto the project site. A KNOX Box and/or Locks will be required for all access gates and building entries as determined by the Imperial County Fire Department. An approved water supply capable of supplying the required fire flow determined by appendix B in the California Fire Code shall be installed and maintained (Minimum fire flow of 1500 GPM for 2 hours) in accordance with NFPA 20, 22, 24. Following these and additional requirements specified in the previously mentioned comment letter from the Imperial County Fire Department would bring impacts to less than significant levels.				
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐
d) The proposed Hydrazine processing facility is in an overall flat terrain, and it is not located in a flooding zone, therefore it is not expected that it would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes. Compliance with all required sections of the fire code, and the Imperial County Fire Department comment letter dated October 24, 2024³⁵, would bring any impacts to less than significant.				

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino, (1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

Revised 2009- CEQA
Revised 2011- ICPDS
Revised 2016 – ICPDS
Revised 2017 – ICPDS
Revised 2019 – ICPDS

SECTION 3

III. MANDATORY FINDINGS OF SIGNIFICANCE

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|--------------------------|
| a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, eliminate tribal cultural resources or eliminate important examples of the major periods of California history or prehistory? | ☐ | ☐ | ☐ | ☐ |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) | ☐ | ☐ | ☐ | ☐ |
| c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☐ | ☐ | ☐ |

IV. PERSONS AND ORGANIZATIONS CONSULTED

This section identifies those persons who prepared or contributed to preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- Diana Robinson, Planning Division Manager
- Luis Bejarano, Planner I
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Ag Commissioner
- Environmental Health Services
- Sheriff's Office

B. OTHER AGENCIES/ORGANIZATIONS

- Imperial Irrigation District
- County Executive Office
- Fort Yuma Quechan Indian Tribe
- Campo Band of Mission Indians Tribe

(Written or oral comments received on the checklist prior to circulation)

V. REFERENCES

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2. Imperial County General Plan: Circulation and Scenic Highway Element
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 - a) Figure 1: Sensitive Habitat Map
 - b) Figure 2: Sensitive Species Map
 - c) Figure 3: Agency-Designated Habitats Map
 - d) Figure 5: Areas of Heighten Historic Period Sensitivity Map
 - e) Figure 6: Known Areas of Native American Cultural Sensitivity Map
 - f) Figure 7: Seismic Hazards Map
 - g) Figure 8: Existing Mineral Resources Map
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 - a) Figure 2: Regional Fault Lines
 - b) Figure 3: Landslide Susceptibility
 - c) Figure 4: Flood Hazards
 - d) Figure 6: Fire Hazard Severity Zones
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26. Imperial County Airport Land Use Compatibility Maps
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27. CalFire: Fire Hazard Severity Zones in Local Responsibility Areas – Imperial County Map
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NEGATIVE DECLARATION – County of Imperial

The following Negative Declaration is being circulated for public review in accordance with the California Environmental Quality Act Section 21091 and 21092 of the Public Resources Code.

Project Name: Conditional Use Permit (CUP) #24-0024
Initial Study (IS) #24-0034
Hydrazine Facility

Project Applicant: RASIRC Inc.

Project Location: The proposed project is located at 3555 Old Highway 111, Imperial, CA 92251, also identified under Assessor's Parcel Number 040-250-024-000, and legally described as PAR 4 PM 802 OF TR 58 14-14 9.59 AC. The property is approximately 9.59 acres and is located on an empty lot on the western side of the Old Highway 111, at about 200 ft away from the State Highway SR-111.

Description of Project:

The applicant submitted a CUP application for a N₂H₄ (Hydrazine) processing facility, with Initial Study #24-0034. The facility will include storage metal containers with appropriate cabinets and containers for raw chemical materials and waste, detached from the main building and constructed to store chemicals safely. The proposed building will be a total of 7,000 sq. ft. This building will be a warehouse facility with an office, parking, and site improvements. The building will have a driveway access from Old Highway 111. This project will be located at property identified under Assessor's Parcel Number (APN) 040-250-024-000, within the Mesquite Lake Specific Plan area. A total of 4 to 12 employees will be working in the warehouse/office, with daily operating hours estimated to be from 7:00 am to 5:00 pm approximately.

VI. FINDINGS

This is to advise that the County of Imperial, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environment and is proposing this Negative Declaration based upon the following findings:

☐ The Initial Study shows that there is no substantial evidence that the project may have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

☐ The Initial Study identifies potentially significant effects but:

- (1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.
- (2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.
- (3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

A MITIGATED NEGATIVE DECLARATION will be prepared.

If adopted, the Negative Declaration means that an Environmental Impact Report will not be required. Reasons to support this finding are included in the attached Initial Study. The project file and all related documents are available for review at the County of Imperial, Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 (442) 265-1736.

NOTICE

The public is invited to comment on the proposed Negative Declaration during the review period.

Date of Determination Jim Minnick, Director of Planning & Development Services

The Applicant hereby acknowledges and accepts the results of the Environmental Evaluation Committee (EEC) and hereby agrees to implement all Mitigation Measures, if applicable, as outlined in the MMRP.

Applicant Signature

Date

SECTION 4

VIII. RESPONSE TO COMMENTS

(ATTACH DOCUMENTS, IF ANY, HERE)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

(ATTACH DOCUMENTS, IF ANY, HERE)



**RASIRC IMPERIAL FACILITY
CONDITIONAL USE PERMIT (CUP) #24-0024 / INITIAL STUDY (IS) #24-0034**

MITIGATION MONITORING AND REPORTING PROGRAM

Introduction

The Mitigation Monitoring and Reporting Program (MMRP) supplements the Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Hydrazine processing facility by providing a mechanism by which all measures in the IS/MND are implemented. The MMRP will be adopted by the County of Imperial Planning Commission in conjunction with the Project.

Purpose of the Mitigation Monitoring and Reporting Program

As the lead agency, the County is responsible for implementing the MMRP, which has been prepared in conformance with Section 21081.6 of the California Public Resources Code as identified below:

(a) When making the findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:

(1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program.

(2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

The MMRP consists of mitigation measures that avoid, reduce, or fully mitigate potential environmental impacts. The mitigation measures have been identified and recommended through preparation of the IS/MND and drafted to meet the requirements of the California Environmental Quality Act (CEQA) Guidelines, Section 15097.

Mitigation Monitoring and Reporting Program Table

Project-specific mitigation measures are contained in the MMRP Table below. The table describes the specific mitigation measures, the responsible party that must comply with the mitigation measure, the regulatory agency having approval of and oversight over the mitigation measure, and the mitigation timeframe describing the timing and/or time range that applies to the mitigation measure. The MMRP will serve as the basis for scheduling the implementation of and compliance with all mitigation measures.

RASIRC IMPERIAL FACILITY
CONDITIONAL USE PERMIT (CUP) #24-0024 / INITIAL STUDY (IS) #24-0034
MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURE	RESPONSIBLE PARTY	REGULATORY AGENCY	MITIGATION TIMEFRAME
SECTION III. AIR QUALITY			
MM AQ-1: The applicant must provide a Health Risk Assessment (HRA) referencing the current CEQA Air Quality Handbook for Imperial County. An Air District Permit and an application for engineering review of the project will need to be submitted along with the design specifications and the HRA for review by the Air Pollution Control District. Any relative humane exposure, location of the project, distance to sensitive receptors should be considered when developing the risk assessment.	RASIRC INC.	Imperial County	Prior to Planning Commission
SECTION IV. BIOLOGICAL RESOURCES			
MM BIO-1: Prior to grading or construction, an initial survey to determine the presence of burrowing owls shall be conducted between February and September by a biologist that has been determined by the USFWS as qualified to conduct burrowing owl surveys. The survey shall be conducted in accordance with the latest USFWS-approved guidelines. A report on the results of the survey and recommended avoidance or mitigation measures shall be provided by the applicant to the USFWS, CDFW, and Imperial County Planning and Development Services Department. No clearing or ground-disturbing activities may be taken until the report and recommendations have been accepted by the USFWS, CDFG, and Imperial County Planning and Development Services Department. All burrowing owls found on the project site shall be tagged by USFWS-qualified burrowing owl biologist. If burrowing owl burrows are found present within construction areas and a 50-meter (165-foot) boundary of construction limits, avoidance is the preferred level of mitigation. If avoidance cannot be met, or no burrowing owls were detected during the first survey, a second survey shall be conducted no less than 30 days prior to any clearing, ground disturbance, or demolition of existing structures. If no burrowing owls are present, a third survey shall be conducted no less than five days prior to the commencement of construction and, if no burrowing owls are present, clearing, grading, demolition, or construction may commence. If burrowing owls were present at the time of the second survey and CDFW and USFWS Office of Law Enforcement concur, on-site passive relocation can be implemented. The project biologist shall evaluate the suitability of nearby habitat, the availability of an existing or constructed alternate burrow for each burrow excavated, and the opportunity for preservation of the site, such as through a conservation easement that would be managed to promote burrowing owl use of the site. Relocation requires that owls should be excluded flow burrows in the immediate impact zone and 50-meter buffer zone by installing one-way doors in burrow entrances, left in place for 48 hours before excavation. Relocation of owls should only be implemented during the nonbreeding season.	RASIRC INC.	Imperial County, California Department of Fish & Wildlife (CDFW), US Fish & Wildlife Service (USFWS)	Prior to the Start of Construction

CUP24-0024 / IS24-0034

COMMENT LETTERS



COUNTY OF
IMPERIAL

DEPARTMENT OF
PUBLIC WORKS

155 S. 11th Street
El Centro, CA
92243

Tel: (442) 265-1818
Fax: (442) 265-1858

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CountyDpw/](https://twitter.com/CountyDpw/)

Public Works works for the Public

February 24, 2025

Mr. Jim Minnick, Director
Planning & Development Services Department
801 Main Street
El Centro, CA 92243

Attention: Luis Bejarano, Planner I

SUBJECT: CUP 24-0024 -Rasirc
Located on Highway 111, Imperial, CA
APN 040-250-024



RECEIVED

FEB 25 2025

**IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES**

Dear Mr. Minnick:

This letter is in response to your submittal received by this department on October 2, 2024, for the above-mentioned project. The applicant proposes a N2H4 (hydrazine) processing and production facility including storage metal containers.

Department staff has reviewed the package information and the following shall be conditions of approval:

1. A trip generation and distribution analysis report shall be prepared by a traffic engineer licensed in the State of California and submitted to this Department for review and approval. Existing traffic counts on Old Highway 111 south of Keystone Road and Keystone Road west of Old Highway 111 shall be obtained and included in the analysis report. The analysis report shall include fair share calculations related to the project's traffic impacts within the Mesquite Lake Specific Plan Area. The Applicant shall be responsible for the fair share contributions identified on this report. The trip generation and distribution analysis report shall be submitted to this Department prior to issuance of Building Permit. The fair share contributions shall be paid to this Department prior to the issuance of the Certificate of Occupancy.
2. The Applicant shall furnish a Drainage and Grading Plan/Study to provide for property grading and drainage control, which shall also include prevention of sedimentation of damage to off-site properties. The Study/Plan shall be submitted to the Department of Public Works for review and approval. The applicant shall implement the approved plan. Employment of the appropriate Best Management Practices (BMP's) should be included (Per Imperial County Code of Ordinances, Chapter 12.10.020 B).
3. An encroachment permit shall be secured from this department for any construction and/or construction related activities within County Right-of-Way. Activities to be covered under an encroachment permit shall include the installation of, but not be limited to, stabilized construction entrances, driveways, road improvements, temporary traffic control devices, etc.

4. Prior to the issuance grading and building permits, a stabilized construction entrance shall be installed under an encroachment permit from this department.
5. The Developer shall repair any damage caused to County Roads during construction and maintain such roads in safe conditions as determined by the Imperial County Road Commissioner. Said road repairs shall be completed under an encroachment permit from this department.
6. All off-site improvements within Imperial County right-of-way shall be financially secured by either a road improvement bond or letter of credit as approved by this department. No encroachment, building or grading permits shall be issued until such time said financial security has been provided.
7. All permanent structures abutting public roads shall be located outside County right-of-way, public utility easements, and drainage easements.
8. All on-site traffic areas shall be hard surfaced to provide all weather access for emergency vehicles. The surfacing shall meet the Department of Public Works and Fire/Office of Emergency Services (EOS) Standards as well as those of the Air Pollution Control District (APCD).
9. A Transportation Permit may be required from road agencies having jurisdiction over the haul route(s) for any hauls of heavy equipment and/or large vehicles which impose greater than legal loads on riding surfaces, including bridges. (Per Imperial County Code of Ordinances, Chapter 10.12 – Overweight Vehicles and Loads).

INFORMATIVE

- All solid and hazardous waste shall be disposed of in approved solid waste disposal sites in accordance with existing County, State and Federal regulations (Per Imperial County Code of Ordinances, Chapter 8.72).
- The project may require a National Pollutant Discharge Elimination System (NPDES) permit and Notice of Intent (NOI) from the Regional Water Quality Control Board (RWQCB) prior county approval of onsite grading plan (40 CFR 122.28).

Should you have any questions, please do not hesitate to contact this office. Thank you for the opportunity to review and comment on this project.

Respectfully,

John A. Gay, PE
Director of Public Works

By:



Francisco Olmedo, PE,
Principal Engineer

AIR POLLUTION CONTROL DISTRICT



RECEIVED

By Imperial County Planning & Development Services at 4:06 pm, Oct 16, 2024

October 15, 2024

Jim Minnick, Director
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243

SUBJECT: Conditional Use Permit 24-0024 – Duggins Construction Inc

Dear Mr. Minnick,

The Imperial County Air Pollution Control Districts (Air District) thanks you for the opportunity to review and comment on Conditional Use Permit (CUP) 24-0024 (Project). The project proposes a facility for the processing and production of Hydrazine (N_2H_4). The project proposes a 7000 sqft warehouse with an office, parking, and site improvements located within the Mesquite Lake Specific Plan area also identified with Assessor's Parcel Number 040-250-024.

As you know, the Air District's established programs help to keep the quality of air in Imperial County from declining. The programs, Rules and Regulations of the Air District in conjunction with the California Environmental Quality Act (CEQA), the most current CEQA Air Quality Handbook for Imperial County (Handbook), and the Air District's State Implementation Plans (SIPs) for Ozone, $PM_{2.5}$ and PM_{10} work together to ensure that air quality improves or does not degrade. Currently, the non-attainment status of marginal for the 2015 ozone standard, moderate for $PM_{2.5}$ and the maintenance requirements for PM_{10} are the driving criteria in establishing the thresholds for NO_x , ROG , PM_{10} , SO_x and CO found in the Handbook. These thresholds and their significance are explained under Section 6 of the handbook.

The Air District informs the applicant that at minimum the project will require an Air District permit and an application for engineering review of the project will need to be submitted along with the design specifications and an HRA as Hydrazine is identified by the U.S. Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (CARB) as a Hazardous Air Pollutant and Air Toxic Pollutant. Section 4.6 of the Handbook states "development projects . . . which have the potential to emit toxic or hazardous air pollutants . . . may be required to prepare a health risk assessment to determine the potential level of risk associated with the operation. The ICAPCD should be consulted on any project with the potential to emit toxic or hazardous air pollutants." Typically, these health risk assessments are of a quantitative nature but can be a mixed qualitative and quantitative analysis. In any case, the relative human exposure, location of the project, distance to sensitive receptors all should be considered when developing the risk assessment.

The project packet did not include any AQA or HRA for review at this point of the project and the Air District strongly recommends referencing the Handbook during the generation of Air Quality Analysis (AQA) and Health Risk Assessment (HRA) as the Handbook has helpful information regarding the development of an adequate air quality analysis and emission thresholds for the Air District.

The Air District also reminds the applicant that the project and any future construction must comply with all Air District rules and regulations and the Air District would emphasize Regulation VIII – Fugitive Dust Rules, a collection of rules designed to maintain fugitive dust emissions below 20% visual opacity.

The Air District requests a copy of the draft CUP prior to recording for review.

The Air District's rules and regulations can be found online for your review at <https://apcd.imperialcounty.org/rules-and-regulations/>, the Handbook can be accessed at <https://apcd.imperialcounty.org/wp-content/uploads/2020/01/CEQAHandbk.pdf>, and permitting forms can be found at <https://apcd.imperialcounty.org/engineering/>. Should you have any questions please feel free to contact the Air District for assistance at (442) 265-1800.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Ismael Garcia', is written over a horizontal line.

Ismael Garcia
Environmental Coordinator

Reviewed Electronically by,
Monica N. Soucier
APC Division Manager

ADMINISTRATION / TRAINING

1078 Dogwood Road
Heber, CA 92249

Administration

Phone: (442) 265-6000
Fax: (760) 482-2427

Training

Phone: (442) 265-6011

**OPERATIONS/PREVENTION**

2514 La Brucherie Road
Imperial, CA 92251

Operations

Phone: (442) 265-3000
Fax: (760) 355-1482

Prevention

Phone: (442) 265-3020

October 24, 2024

RECEIVED

By Imperial County Planning & Development Services at 8:03 am, Oct 24, 2024

RE: N2H4 (Hydrazine) Processing Facility
Hwy 111, Imperial CA 92251 APN: 040-250-024
CUP #24-0024, IS #24-0034

Imperial County Fire Department Fire Prevention Bureau would like to thank you for the opportunity to review and comment on the proposed Hydrazine processing facility, CUP #24-0024.

The project description is developing and operating a N2H4 (Hydrazine) processing and production facility. The proposed facility will be a building with a total of 7,000 square feet, storage metal containers, tanks, raw chemical materials and waste.

Fire Department requirements are the following:

- Approved all-weather access roads for fire protection vehicles shall be provided throughout the project, conforming with the California Fire Code Chapter 5, section 503. Access roadways shall be all-weather surface (suitable for use by fire apparatus) right-of-way not less than 20 feet in width.
- Additional access shall be provided to the project site in accordance with the California Fire Code Chapter 5, section 503. Minimum two points of entry shall be provided into the project site.
- KNOX Box and/or Locks will be required for all access gates and building entry as determined by Imperial County Fire Department.
- An approved water supply capable of supplying the required fire flow determined by appendix B in the California Fire Code shall be installed and maintained. (Minimum fire flow of 1500 GPM for 2 hours) Private fire service mains and appurtenance shall be installed in accordance with NFPA 20, 22, 24
- An approved automatic fire suppression system shall be installed on all required structures as per the California Fire Code Chapter 9. All fire suppression systems will be installed and maintained to the current adapted fire code and regulations.
- An approved automatic fire detection system shall be installed on all required structures as per the California Fire Code Chapter 9. All fire detection systems will be installed and maintained to the current adapted fire code and regulations.
- Hazard identification and signs shall be provided as required by the California Fire Code and NFPA.

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

ADMINISTRATION / TRAINING

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2514 La Brucherie Road
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Prevention

Phone: (442) 265-3020

- Hazardous material leak and/or release mitigation equipment shall be onsite in an approved location determined by Imperial County Fire Department officials. Additional equipment may be required upon review.
- Compliance with all required sections of the fire code.
- Applicants shall provide product containment areas(s) for both product and water run-off in case of fire applications and retained for removal.
- An emergency response/action plan shall be prepared and approved by the Imperial County Fire/OES Department.
- A pre-incident plan shall be developed and approved by the Imperial County Fire/OES Department in a format and using a platform determined by ICFD.
- A Hazardous Waste Material Plan shall be submitted to Certified Unified Program Agency (CUPA) for their review and approval.
- All hazardous material and wastes shall be handled, store, and disposed as per the approved Hazardous Waste Materials Plan. All spills shall be documented and reported to the Imperial County Fire Department and CUPA as required by the Hazardous Waste Material Plan.

Cost Recovery

- The applicant shall provide cost reimbursement for direct fire protection and hazardous material response services. Service rate will be consistent with Imperial County Fire Department adopted fee schedule. Cost reimbursement will be from time of call to the conclusion of the incident as defined by the fire department.

Again, thank you for the opportunity to comment. Imperial County Fire Department reserves the right to comment and request additional requirements pertaining to this project regarding fire and life safety measures, California building and fire code, and National Fire Protection Association standards at a later time as we see necessary.

If you have any questions, please contact the Imperial County Fire Prevention Bureau at 442-265-3020 or 442-265-3021.

Sincerely

Andrew Loper *Andrew Loper*
Lieutenant/Fire Prevention Specialist
Imperial County Fire Department
Fire Prevention Bureau

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

ADMINISTRATION / TRAINING

1078 Dogwood Road
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**OPERATIONS/PREVENTION**

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Phone: (442) 265-3000
Fax: (760) 355-1482

Prevention

Phone: (442) 265-3020

CC: David Lantzer Fire Chief
Imperial County Fire Department



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October 3, 2024

RECEIVED

By Imperial County Planning & Development Services at 9:29 am, Oct 03, 2024

Mr. Luis Bejarano
Planner I
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: Hydrazine Processing Facility Project; CUP #24-0024, IS #24-0034

Dear Mr. Bejarano:

On October 2, 2024, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a request for agency comments on a hydrazine processing facility project; Conditional Use Permit No. 24-0024, Initial Study No. 24-0034. The applicant, Duggins Construction, Inc.; proposes building a 5,000 sq. ft. facility for N₂H₄ (Hydrazine) processing and production. The facility will include warehouse, office, parking areas and appropriate storage cabinets and containers for raw chemical materials and waste detached from the main building. A total of 8 to 10 employees will be working in the warehouse/office. The site is located on E. Keystone Road & Old Hwy. 111, 5 miles south of Brawley, California (APN 040-250-024).

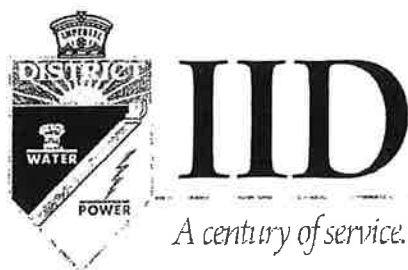
The IID has reviewed the project information and found that the comments provided in the July 10, 2024 district letter (see attached) continue to apply. However, when a project goes through the CEQA compliance process, it is important to bear in mind that to address the project impacts to the electrical utility (i.e., the IID electrical grid), considered under the environmental factor "Utilities and Services" of the Environmental Checklist/Initial Study, and determine if the project would require or result in the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects; a circuit study/distribution impact study, facility study, and/or system impact study must be performed

Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargas
Compliance Administrator II

Jamie Asbury – General Manager
Mike Pacheco – Manager, Water Dept.
Matthew H Smelser – Manager, Power Dept.
Paul Rodriguez – Deputy Mgr. Power Dept.
Geoffrey Holbrook – General Counsel
Michael P. Kemp – Superintendent General, Fleet & Compliance Services
Laura Cervantes – Supervisor, Real Estate
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.



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Since 1911

July 10, 2024

Mr. Luis Valenzuela
Planner II
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: Hydrazine Facility Pre-Application

Dear Mr. Valenzuela:

On July 9, 2024, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a request for agency comments on the Pre-Application for a Hydrazine Facility. The applicant, Kurt Christian/ Duggins Construction, Inc.; proposes building a 5,000 sq. ft. facility for N2H4 (Hydrazine) processing and production. The facility will include warehouse, office, parking areas and appropriate storage cabinets and containers for raw chemical materials and waste detached from the main building. A total of 8 to 10 employees will be working in the warehouse/office. The site is located on E. Keystone Road & Old Hwy. 111, 5 miles south of Brawley, California (APN 040-250-024).

The IID has reviewed the application and has the following comments:

1. If and when the project needs electrical service, the applicant should be advised to contact Ignacio Romo, IID project development planner, at (760) 482-3426 or e-mail Mr. Romo at IGRomo@IID.com to initiate the customer service application process. In addition to submitting a formal application (<http://www.iid.com/home/showdocument?id=12923>), the applicant will be required to submit an AutoCAD file of site plan, approved electrical plans, electrical panel size and panel location, operating voltage, electrical loads, project schedule, and the applicable fees, permits, easements and environmental compliance documentation pertaining to the provision of electrical service to the project. The applicant shall be responsible for all costs and mitigation measures related to providing electrical service to the project.
2. Electrical capacity is limited in the project area. A circuit study may be required. Any system improvements or mitigation identified in the circuit study to enable the provision of electrical service to the project shall be the financial responsibility of the applicant.
3. Applicant shall provide a surveyed legal description and an associated exhibit certified by a licensed surveyor for all rights of way deemed by IID as necessary to accommodate the project electrical infrastructure. Rights-of-Way and easements shall be in a form acceptable to and at no cost to IID for installation, operation, and maintenance of all electrical facilities.

4. IID water facilities that could be impacted include the Redwood Lateral 7 Spill Pipeline and Rose Drain No. 10, located adjacent to the parcel's south boundary.
5. The project's retention basin may impact IID drains with project site runoff flows draining into IID drains. To mitigate impacts, the project may require a comprehensive IID hydraulic drainage system analysis. The drainage system analysis includes an associated drain impact fee.
6. To properly assess the impacts to IID water facilities, applicant should submit project plans, including grading & drainage and fencing plans, to IID Water Department Engineering Services for review and comment prior to final project design approval. IID WDES can be contacted at (760) 339-9265 for further information on this matter.
7. The applicant will be required to provide and bear all costs associated with acquisition of rights of way, easements, and infrastructure relocations deemed necessary to accommodate street or road improvements imposed by the municipality or County.
8. The applicant will be required to provide rights of ways and easements for any proposed power line extensions and/or any other infrastructure needed to serve the project as well as the necessary access to allow for continued operation and maintenance of any IID facilities located on adjoining properties.
9. To obtain water for construction purposes, the applicant should contact IID South End Division at (760) 482-9800.
10. For information regarding water supply policies and long-term water supply requests, the applicant should contact Ms. Justina Gamboa-Arce, IID senior water resources planner, at (760) 339-9085 or e-mail Ms. Gamboa-Arce at jgamboaarce@IID.com.
11. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at the website <https://www.iid.com/about-iid/departments-directory/real-estate>. No foundations or buildings will be allowed within IID's right of way. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.
12. An IID encroachment permit is required to utilize existing surface-water drainpipe connections to drains and receive drainage service from IID. Surface-water drainpipe connections are to be modified in accordance with IID Water Department Standards. A construction storm-water permit from the California Regional Water Quality Control Board is required before commencing construction and an industrial storm water permit from

Luis Valenzuela
July 10, 2024
Page 3

CRWQCB is required for the operation of the proposed facility. The project's Storm Water Pollution Prevention Plan and the storm-water permit are to be submitted to IID.

13. In addition to IID's recorded easements, IID claims, at a minimum, a prescriptive right of way to the toe of slope of all existing canals and drains. Where space is limited and depending upon the specifics of adjacent modifications, the IID may claim additional secondary easements/prescriptive rights of ways to ensure operation and maintenance of IID's facilities can be maintained and are not impacted and if impacted mitigated. Thus, IID should be consulted prior to the installation of any facilities adjacent to IID's facilities. Certain conditions may be placed on adjacent facilities to mitigate or avoid impacts to IID's facilities.
14. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, water deliveries, canals, drains, etc.) need to be included as part of the project's California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA) documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.

Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,



Donald Vargas
Compliance Administrator II

Jamie Asbury – General Manager
Mike Pacheco – Manager, Water Dept.
Matthew H Smelser – Manager, Energy Dept.
Paul Rodriguez – Deputy Mgr. Energy Dept.
Geoffrey Holbrook – General Counsel
Michael P. Kemp – Superintendent General, Fleet Services and Reg. & Environ. Compliance
Laura Cervantes – Supervisor, Real Estate
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.

COUNTY EXECUTIVE OFFICE

Miguel Figueroa
County Executive Officer
miguelfigueroa@co.imperial.ca.us
www.co.imperial.ca.us



County Administration Center
940 Main Street, Suite 208
El Centro, CA 92243
Tel: 442-265-1001
Fax: 442-265-1010

July 9, 2024

RECEIVED

By Imperial County Planning & Development Services at 9:22 am, Oct 21, 2024

TO: Luis Bejarano, Planning and Development Services Department

FROM: Rosa Lopez, Executive Office 

SUBJECT: Request for Comments – N2H4 (Hydrazine) Processing and Production Project / APN 040-250-024

The County of Imperial Executive Office is responding to a request for comments: N2H4 (Hydrazine) Processing and Production Project / APN 040-250-024. The Executive Office would like to inform the developer of conditions and responsibilities of the applicant seeking a Conditional Use Permit (CUP). The conditions commence prior to the approval of an initial grading permit and subsequently continue throughout the permitting process. This includes, but not limited to:

- Sales Tax Guarantee. The permittee is required to have a Construction Site Permit reflecting the project site address, allowing all eligible sales tax payments are allocated to the County of Imperial, Jurisdictional Code 13998. The permittee will provide the County of Imperial a copy of the CDTFA account number and sub-permit for its contractor and subcontractors (if any) related to the jobsite. Permittee shall provide in written verification to the County Executive Office that the necessary sales and use tax permits have been obtained, prior to the issuance of any grading permits.
- Construction/Material Budget: The permittee will provide the County Executive Office a construction materials budget: an official construction materials budget or detailed budget outlining the construction and materials cost for the processing facility on permittee letterhead.
- At developers cost, the County Executive Office shall hire a third-party consultant to produce a Fiscal and Economic Impact Analysis & Job and Employment Analysis (FEIA & JEIA) prior to project being placed on Planning Commission meeting.

Should there be any concerns and/or questions, do not hesitate to contact me.

Luis Bejarano

From: Rosa Lopez
Sent: Tuesday, March 25, 2025 5:58 PM
To: 'Oscar Grijalva'; Melissa Gomez
Cc: Avery Moler; Kurt Christian; Jim Minnick; Luis Bejarano
Subject: RE: Hydrazine Project - APN 040-250-024

Mr. Grijalva.

Good afternoon,

Thank you for following up. After reviewing the submitted information, the Executive Office has determined that the Hydrazine Project – APN 040-250-024 appears to meet, to the best of its ability, the requirements outlined in the sales tax condition. However, to ensure full compliance, our office will continue to monitor the project throughout the construction process and conduct periodic confirmations as needed.

Based on our assessment, we find that this project is in a position to proceed with the entitlement and permitting process. Please do not hesitate to reach out should any further clarification or additional documentation be required.

Thank you for your time and effort on this matter.

Rosa

Rosa C. López Solís

EXECUTIVE OFFICE BUDGET AND PROGRAM ADMINISTRATOR

COUNTY OF IMPERIAL

COUNTY EXECUTIVE OFFICE

PH 442.265.1001

FX 760.352.7876

E-MAIL ROSALopez@CO.IMPERIAL.CA.US

The preceding e-mail message (including any attachments) contains information that may be confidential, be protected by the attorney-client or other applicable privileges, or constitute non-public information. It is intended to be conveyed only to the designated recipient(s). If you are not an intended recipient of this message, please notify the sender by replying to this message and then delete it from your system. Use, dissemination, distribution, or reproduction of this message by unintended recipients is not authorized and may be unlawful.

From: Oscar Grijalva <oscar@dugginsconstruction.com>
Sent: Monday, March 24, 2025 9:06 AM
To: Rosa Lopez <RosaLopez@co.imperial.ca.us>; Melissa Gomez <melissa@dugginsconstruction.com>
Cc: Avery Moler <avery@dugginsconstruction.com>; Kurt Christian <kchristian@rasirc.com>; Jim Minnick

Luis Bejarano

From: Frank Reece <historicpreservation@quechantribe.com>
Sent: Thursday, October 3, 2024 10:36 AM
To: Aimee Trujillo
Subject: RE: [EXTERNAL]:CUP24-0024/ IS24-0024 - Request for Comments

CAUTION: This email originated outside our organization; please use caution.

Good morning,
This email is to inform you that we do not wish to comment on this project.

Jill

H. Jill McCormick M.A.
Ft. Yuma Quechan Indian Tribe
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-919-3631



From: Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>
Sent: Wednesday, October 02, 2024 4:58 PM
To: Antonio Venegas <AntonioVenegas@co.imperial.ca.us>; Ashley Jauregui <AshleyJauregui@co.imperial.ca.us>; Jolene Dessert <JoleneDessert@co.imperial.ca.us>; Margo Sanchez <MargoSanchez@co.imperial.ca.us>; Belen Leon-Lopez <BelenLeon@co.imperial.ca.us>; Monica Soucier <MonicaSoucier@co.imperial.ca.us>; Jesus Ramirez <JesusRamirez@co.imperial.ca.us>; John Hawk <johnhawk@co.imperial.ca.us>; Miguel Figueroa <miguelfigueroa@co.imperial.ca.us>; Rebecca Terrazas-Baxter <RebeccaTerrazas-Baxter@co.imperial.ca.us>; Rosa Lopez <RosaLopez@co.imperial.ca.us>; Bari Bean <baribean@co.imperial.ca.us>; Jeff Lamoure <JeffLamoure@co.imperial.ca.us>; Jorge Perez <JorgePerez@co.imperial.ca.us>; Alphonso Andrade <AlphonsoAndrade@co.imperial.ca.us>; Marco Topete <marcotopete@co.imperial.ca.us>; Sheila Vasquez-Bazua <sheilavasquezbazua@co.imperial.ca.us>; Andrew Loper <AndrewLoper@co.imperial.ca.us>; David Lantzer <davidlantzer@co.imperial.ca.us>; rkelly@icso.org; Fred Miramontes <fmiramontes@icso.org>; Robert Benavidez <RBenavidez@icso.org>; dvargas@iid.com; kimberly.dodson@dot.ca.gov; roger.sanchez-rangel@dot.ca.gov; robert.krug@dtsc.ca.gov; marcuscuero@campo-nsn.gov; jmesa@campo-nsn.gov; Frank Reece <historicpreservation@quechantribe.com>; Tribal Secretary <tribalsecretary@quechantribe.com>
Cc: Jim Minnick <JimMinnick@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>; Luis Bejarano <luisbejarano@co.imperial.ca.us>; Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>; Jenyssa Gutierrez <jenyssagutierrez@co.imperial.ca.us>; Kamika Mitchell

CUP24-0024 / IS24-0034

APPLICATION

CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (442) 265-1736

- APPLICANT MUST COMPLETE ALL NUMBERED (black) SPACES - Please type or print -

1. PROPERTY OWNER'S NAME <u>RASIRC</u>	EMAIL ADDRESS <u>JS@RASIRC.COM</u>	
2. MAILING ADDRESS (Street / P O Box, City, State) <u>7815 Silverton Ave, San Diego CA 92126</u>	ZIP CODE <u>92126</u>	PHONE NUMBER <u>858 259 1220</u>
3. APPLICANT'S NAME <u>Duggins Construction, Inc.</u>	EMAIL ADDRESS <u>melissa@dugginsconstruction.com/ iris@dugginsconstruction.com</u>	
4. MAILING ADDRESS (Street / P O Box, City, State) <u>341 W. Crown Court, Imperial, CA.</u>	ZIP CODE <u>92251</u>	PHONE NUMBER <u>(760) 355-5600</u>
4. ENGINEER'S NAME CA. LICENSE NO.	EMAIL ADDRESS	
5. MAILING ADDRESS (Street / P O Box, City, State)	ZIP CODE	PHONE NUMBER

6. ASSESSOR'S PARCEL NO. <u>040-250-024</u>	SIZE OF PROPERTY (in acres or square foot) <u>9.59 Acres</u>	ZONING (existing) <u>ML-1-2-RE</u>
7. PROPERTY (site) ADDRESS <u>E. Key Stone Rd., Imperial, CA. 92251</u>	<u>3555 old Highway 111, Imperial CA</u>	
8. GENERAL LOCATION (i.e. city, town, cross street) <u>Imperial, E. Key Stone Road and Old Highway 111</u>		
9. LEGAL DESCRIPTION <u>PAR 4 PM 802 OF TR 58 14-14 9.59 AC</u>		

PLEASE PROVIDE CLEAR & CONCISE INFORMATION (ATTACH SEPARATE SHEET IF NEEDED)

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail)	<u>New 7,000 sq.ft. warehouse facility for N2H4 (Hydrazine) processing and production, with an office, parking and site improvements.</u>
11. DESCRIBE CURRENT USE OF PROPERTY	<u>Vacant</u>
12. DESCRIBE PROPOSED SEWER SYSTEM	<u>Septic Tank</u>
13. DESCRIBE PROPOSED WATER SYSTEM	<u>IID irrigation ditch w/a private potable water system</u>
14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM	<u>Fire Sprinklers</u>
15. IS PROPOSED USE A BUSINESS? ☒ Yes ☐ No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE? <u>4-8</u>

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN IS TRUE AND CORRECT.

Jeffery Spiegelman 8/19/24
Print Name Date
[Signature]
Signature

Print Name Date

Signature

REQUIRED SUPPORT DOCUMENTS

A. SITE PLAN	_____
B. FEE	_____
C. OTHER	_____
D. OTHER	_____

APPLICATION RECEIVED BY: RY
APPLICATION DEEMED COMPLETE BY: _____
APPLICATION REJECTED BY: _____
TENTATIVE HEARING BY: _____
FINAL ACTION: ☐ APPROVED ☐ DENIED

DATE 09/03/24 REVIEW / APPROVAL BY
OTHER DEPT'S required
☐ P W.
☐ E H S.
☐ A P C D
☐ O E S
DATE _____
DATE _____

CUP #

04-0024
1524-0034



DESCRIPTION LETTER

TO: COUNTY OF IMPERIAL (PLANNING AND DEVELOPMENT SERVICES)
FROM: DUGGINS CONSTRUCTION – MELISSA GOMEZ
SUBJECT: HYDRAZINE – CONDITIONAL USE PERMIT APPLICATION
DATE: 03/25/2025
CC:

We are submitting this letter regarding a Conditional Use Permit application for a property located near Old Highway 111 Road, under APN: 040-250-024.

This site is currently an undeveloped dirt parcel. The north side of the property abuts a solar plant. The east of the property abuts Old Highway 111. The West side of the property abuts an undeveloped dirt parcel. The South abuts the Redwood lateral & Mesquite Lake Water and Power Plant.

The proposed building will be a total of 7,000 sq. ft. This building will be a warehouse facility with an office, parking and site improvements. The building will have a driveway access from Old Highway 111.

The proposed building is a facility for N₂H₄ (Hydrazine) processing, ensuring safe handling and compliance with industry standards. The facility will include storage metal containers with appropriate cabinets and containers for raw chemical materials and waste, detached from the main building and constructed to store chemicals safely. The hydrazine storage is required near the building because there is going to be a double wall pipe (to prevent leaks) connected from the storage to the building to route the hydrazine for processing. The office portion of the building is located at the east side, near the parking lot. A total of 4 to 12 employees will be working in the warehouse/office and will conduct normal business hours between 7 am and 5 pm.

This site will provide 15 automobile parking stalls as required by the County of Imperial zoning ordinance. A box delivery truck (UPS truck) will have access to the unloading area for shipping and receiving, approximately 5 to 10 times a month.

If there are any questions or concerns, please feel free to call me at 760-355-5600 or email at melissa@dugginsconstruction.com

RASIRC – IMPERIAL Planned Site Use and Traffic



7815 Silverton Ave
San Diego, CA 92126
858.259.1220 / 858.259.0123 fax
www.rasirc.com

Business Activity Summary

RASIRC will conduct normal business hours between 7am and 5pm with 4-12 employees working a typical 8 hour day.

Work performed will be light production made up of receiving small quantities of liquids (typically less than 5 gallons), purifying liquids by using filters and other solid media such as pellets of aluminum oxide, and then filling small vessels with purified liquid. Vessels range in size from 1.5 liters to 4 liters in size (1/2 to 1 gallon) and are individually packaged for shipment to customers worldwide.

The production volume will initially be low, consisting of shipments several times per month with future volumes approaching several times per week. Product shipments and raw material deliveries will be provided by FedEx or UPS and occur several times per week. Times may vary depending on the delivery routes and schedules of the transportation companies.

RASIRC Products are sold to Semiconductor manufacturers and are usually sold through distributors or directly through our office in San Diego. Customers do not visit the site for purposes of sales or inquiry. There will be no customer traffic at this location.

Vehicle traffic would consist of weekday commuting of employees and infrequent shipments and deliveries of goods. During the start-up phase, traffic will potentially be greater as the equipment for the plant operation will be delivered, qualified and placed into service. There will also be visits from the San Diego facility to ensure facility startup and operational readiness. We would assume the number of vehicles on site would be proportional to the number of employees. RASIRC does not have any fleet vehicles or machinery other than a forklift for shipping and receiving purposes.

Kurt Christian
Director Facilities and Construction
RASIRC Inc

Proposed Business Description for Hydrazine Processing



7815 Silverton Ave
San Diego, CA 92126
858.259.1220 / 858.259.0123 fax
www.rasirc.com

Description of activities to be performed at the site:

RASIRC produces ultra-pure Hydrazine (N_2H_4) for use in Semiconductor manufacturing processes.

We receive raw, unpurified hydrazine from a manufacturer in Lake Charles, Louisiana and process it to remove any remaining moisture. This purified hydrazine is then used to fill small vessels, up to 4 liters, which are then shipped to customers worldwide.

1. Business Overview

- RASIRC INC provides highly purified Brute® Hydrazine to semiconductor manufacturing companies for various uses in the production of integrated circuits and other products. These companies are located throughout the world and rely upon our products to leverage advances in efficiency and product development. We currently ship to Europe, Japan and Asia and expect to expand our business to other regions in the future.
- Initial operation requirements call for normal operating hours from 7am to 5pm daily. Employees would initially number 4 to 12 with responsibilities in facilities and safety management, production management and process control. The facility would be a secured, closed environment with access-controlled building (badging) inside a fenced environment (gated entry).
- We will receive low grade hydrazine chemical shipped under UN 2029 that typically has contaminants and moisture levels in the 0.01% range of the total composition. We then purify and dry the hydrazine so that the moisture levels are less than 0.0000001% of the total composition. This level of purity is necessary for many of the stringent requirements in semiconductor manufacturing.
- We purify the hydrazine using a simple process of passing the hydrazine through moisture absorbing inert media until high purity levels are obtained. Once the purity is established, we transfer the "dry" hydrazine into small vessels filled with an inert dried solvent material which are then packaged and shipped using standard IATA and DOT dangerous goods shipping practices. The purified hydrazine is trademarked as Brute® Hydrazine.
- Hazardous waste will be collected and properly disposed of by a licensed third party company.

2. Facility Overview

- Build a factory with all the elements necessary for a standalone operation including hydrazine purification, shipping, and receiving capabilities, and dedicated spaces for quality assurance, inventory control, maintenance, utilities, information technology and communications. Standard facility accommodation such as offices, cubicle workstations, conference rooms, employee break rooms and bathrooms will be provided.
- External covered parking for up to 12 employees with small truck access to roll up door loading dock areas connected to the shipping and receiving area.
- External 4-hour fire rated storage structures for raw Hydrazine and hazardous wastes.
- External nitrogen storage tank, gas bottle storage and electrical pad.

3. Process Overview (see attached block diagram):

- Raw, unpurified hydrazine is delivered and stored within a pre-manufactured chemical storage building located adjacent to the main building. This storage building will be air conditioned, sprinklered, and exhausted using an abatement system designed to capture any unplanned release of hydrazine.
- The unpurified hydrazine is transferred via double walled stainless-steel piping to a vessel within a fume hood inside the Hydrazine Processing room. The transfer is conducted via a secondarily contained closed loop piping system.
- Hydrazine is drawn from this vessel into a series of heated columns containing aluminum oxide pellets and nitrogen gas to dry the hydrazine. The output of this process is nitrogen gas, water vapor, and purified hydrazine. The media used in the drying process is reused several times until it is no longer effective. Once ineffective, it is removed and placed into sealed containers and transferred to the hazardous waste container outside of the building to await waste pickup. A licensed, third part company will then remove, transport, and dispose of the waste.
- Raw, soap-like, inert "solvent" is delivered and stored in an inventory location within the main building. The solvent is then dried in a Solvent Processing room to remove all traces of moisture (*anhydrous solvent*). Nitrogen gas is used during the drying process with water vapor as the main contaminant in the vent stream. However, as low levels of hydrocarbons may also be present, carbon bed venting will be used to remove any contaminants.
- Small stainless-steel vessels of one to four liters are placed into an inventory location in the main building. Vessels are then transferred to the Solvent Processing room where they are filled with the anhydrous solvent. Solvent-filled vessels are then transferred to the Hydrazine Processing room where they are placed inside a pass-thru box located within a walk-in fume hood to await filling of the purified hydrazine.
- Stainless steel vessels pre-filled with anhydrous solvent are staged in a pass through cabinet, moved into the transfill cabinet, and connected to the manifolding network to receive the purified hydrazine.
- Once mixed with the solvent, the product is now called Brute® Hydrazine.

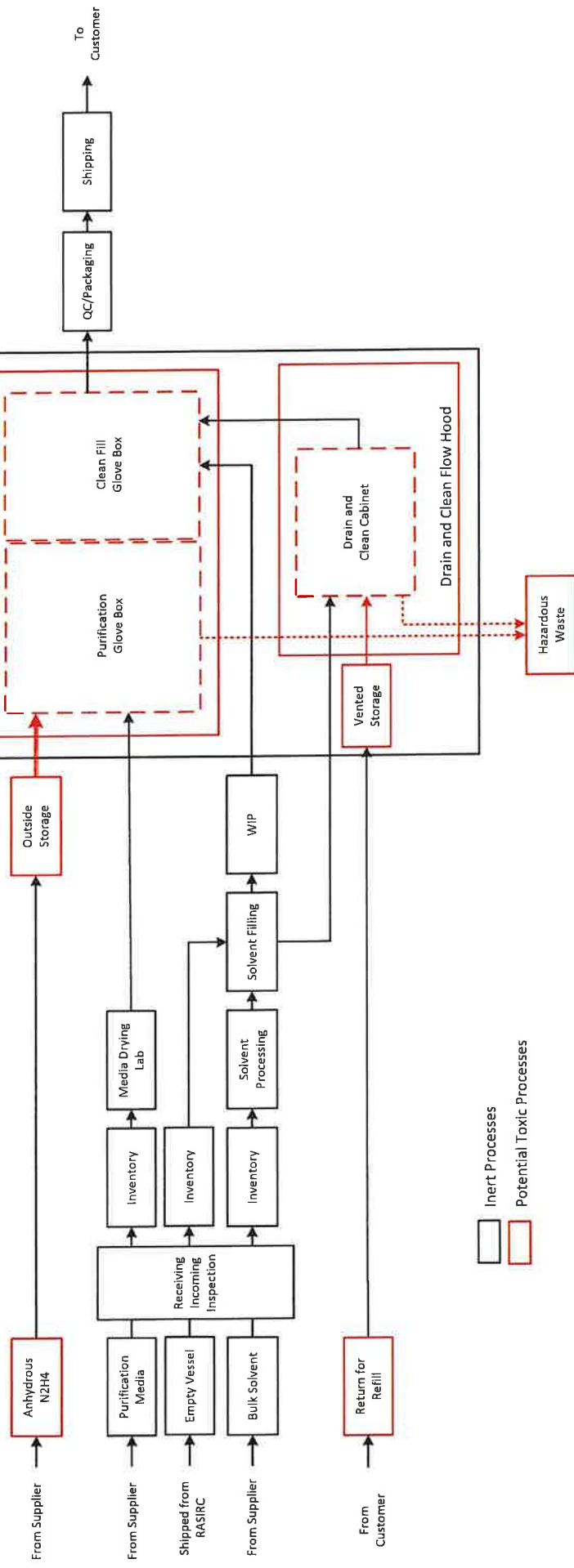
- The filled Brute® Hydrazine Vessel ("BHV") is then tested for purity and hydrazine contamination.
 - After filled and tested, the BHV valves are closed, and metal stainless steel caps are placed on the ports of the vessel. The vessel is then ready to be placed in the transfill pass through for certification.
 - Once certified to have less than 10 ppb hydrazine, the vessel is transported to the packaging and shipping process station.
 - BHVs are packaged according to DOT hazardous materials transportation requirements where it is then delivered to customers.
4. The following chemicals and gases will be used on site:
- Purified Hydrazine (N_2H_4) – delivered from supplier
 - i. Externally stored in a specialized pre-manufactured structure specifically designed to handle toxic, flammable, or hazardous chemicals. Maximum of 40 pounds = 4.77 gallons = 17.88 liters
 - ii. Internally stored in a specialized cabinet specifically designed to handle gases and liquids. Maximum of 40 pounds = 4.77 gallons = 17.88 liters
 - iii. Internally used within the Hydrazine Processing Room
 - iv. NOTE: We plan to seek agency approval to increase internal and external storage capacity as production warrants.
 - Brute® Hydrazine – produced on site
 - i. Stored in specially designed transfer containers used for filling smaller vessels on site. Maximum of 1000 pounds = 119 gallons = 445 liters.
 - Liquid Nitrogen (N_2) gas – delivered from local specialty gas company and stored externally in a bulk storage tank
 - i. Tank size (TBD)
 - ii. Piped to each required location by welded stainless-steel tubing
 - Compressed Dry Air – produced on site
 - i. Three (3) storage tanks (200 gallons per tank)
 - ii. Piped to each required location
 - Reverse Osmosis De-Ionized Water ("RODI") – produced on site
 - i. One (1) storage tank (100 gallons)
 - Isopropanol – standard concentration; available from suppliers
 - i. < Ten (10 gallons)
 - Acetone – standard concentration; available from suppliers
 - i. < Two (2 gallons)
 - Hydrogen gas – 100% concentration (pending)
 - i. Two (2) cylinders
 - Helium gas – 100% concentration
 - i. Two (2) cylinders
5. Safety Design – the process is designed to prevent unplanned releases of any form of contaminants into the environment. The only emissions from the processes and the factory itself will be nitrogen gases with added H_2O (water vapor) that is captured during the drying processes of inert materials. Although the manufacturing process does not emit hazardous contaminants, the facility abatement systems are employed

as a precautionary measure to mitigate emissions of contaminants in the event of an unplanned release.

6. Facility Design – any area in which the potential for hydrazine to be released will have specific designs for multiple levels of containment.
 - Processing rooms will be designed with fire ratings greater than 2 hours
 - Rooms will be constantly vented to abatement systems
 - Walk in fume hoods will be located in rooms within hydrazine processing. These fume hoods will be constantly vented to abatement systems
 - Sealed glove boxes will be located within fume hoods and be vented to abatement systems.
 - Any room that has the potential for hydrazine release will have hydrazine detection monitors with connectivity to initiate shut down sequences and activate alarm systems
 - Supervisory Control and Data Acquisition (“SCADA”) monitoring and control system will be installed as a supervisory mechanism.
7. Safety Training – extensive, periodic safety training is required and conducted annually and upon initial employment. All employees are required to participate in all safety-related training and full adherence to established procedures.
8. Abatement Systems – each controlled area will use high velocity exhaust systems that will continuously vent to an abatement system designed specifically for hydrazine capture. The abatement system we currently use is manufactured by CS Clean Solutions and is currently employed in our similar facility in Longmont, Colorado. All instances of hydrazine transfer, use or storage will be connected directly to an abatement system. All fume hood exhaust paths will also be connected to an abatement system in case of any unplanned release of hydrazine.
9. Hydrazine Detection – Detectors will be actively monitoring each step in the process to detect any unplanned release of hydrazine. Detectors are connected to the “SCADA system for real time monitoring and control of processes, storage and containment areas, processing glove boxes, fume hood, pass throughs, gas cabinets, and external storage and waste areas.
10. Emergency Response and Control – in the event of an unplanned release of hydrazine, processes will be shut down and isolated, alarms will be activated, and emergency response measures will be initiated. Emergency response measures include alarm activation (both visual and audible) and communications with employees throughout the building.
11. Fire Suppression – all storage and use areas will have fire detection and suppression systems installed. The water supply external to the building will have sufficient capacity and capability to extinguish any potential fire. Each storage and use area will have secondary containment designed to capture water that may be used in fire suppression to reduce the risk of environmental contamination. Intumescent paint will be used in all areas where the need for extended fire rating is desired. This paint will increase the fire rating of the spaces for up to 10 hours above normal.

12. Hazardous waste storage and containment – all hazardous waste will be removed from the main building and stored in an external chemical storage building.
13. Regulatory compliance – all hazardous chemicals and waste will be properly controlled and identified according to requirements set forth by OSHA, GHS, Fire Code and any other applicable standards. All chemicals will be stored in approved chemical storage containers and storage lockers. Any storage areas of hydrazine shall have hydrazine detectors, fire suppression, secondary containment, and integrated emergency response monitoring and control.
14. Equipment and Utilities – Processing equipment consists of commonly available industrial components used in cleanroom operations. Primarily mechanical components used to distribute, control and regulate the flow of gases and liquids.
 - There is no usage of combustible materials used to operate any forms of machinery. All equipment will use supplied electrical power provided from the utility company and internally generated solar power systems.

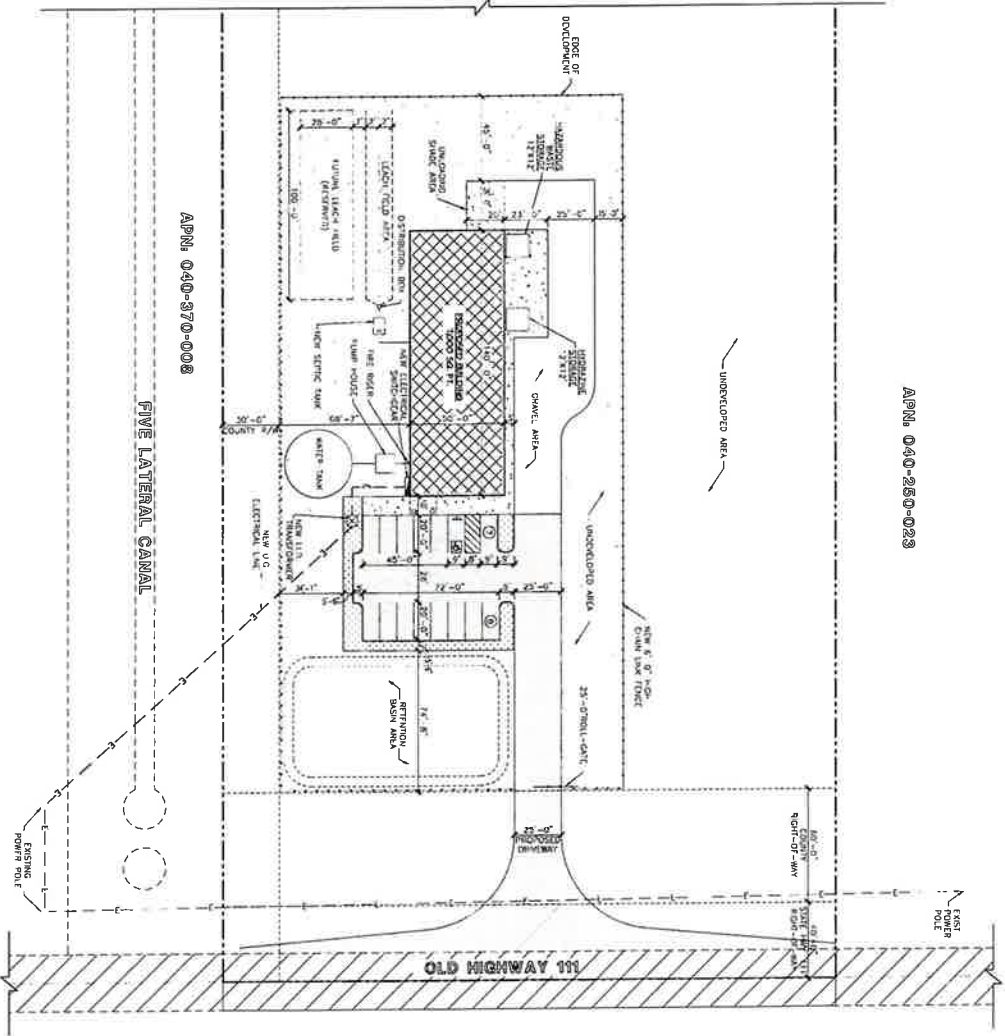
Hydrazine Process Flow Overview



HYDRAZINE FACILITY

OLD HIGHWAY 111, IMPERIAL, CA. 92251

APN: 040-250-023



ENLARGED SITE PLAN
SCALE: 1"=30'-0"



PROPERTY BOUNDARY NOTE
THE PROPERTY BOUNDARY LINES SHOWN ON THIS PLAN SHALL NOT BE USED AS A LEGAL DOCUMENT FOR LOCATING, OR AS EVIDENCE OF THE LOCATION OF ANY BOUNDARY. THE BOUNDARY LINES SHOWN ON THIS PLAN ARE BASED ON THE RECORD PLANS AND SURVEY DATA PROVIDED TO THE ENGINEER BY THE OWNER. THE ENGINEER HAS CONDUCTED A VISUAL INSPECTION OF THE PROPERTY AND HAS FOUND NO EVIDENCE OF ANY BOUNDARY DISCREPANCIES. THE BOUNDARY LINES SHOWN ON THIS PLAN ARE BASED ON THE RECORD PLANS AND SURVEY DATA PROVIDED TO THE ENGINEER BY THE OWNER. THE ENGINEER HAS CONDUCTED A VISUAL INSPECTION OF THE PROPERTY AND HAS FOUND NO EVIDENCE OF ANY BOUNDARY DISCREPANCIES.

VICINITY MAP

1" = 1/4" TO SCALE



PROJECT DATA

PROJECT OWNER:
HYDRAZINE FACILITY
111 OLD HIGHWAY 111
IMPERIAL, CA 92251

CONTRACTOR/ENGINEER:
DUGGINS CONSTRUCTION, INC.
111 OLD HIGHWAY 111
IMPERIAL, CA 92251

BUILDING DATA

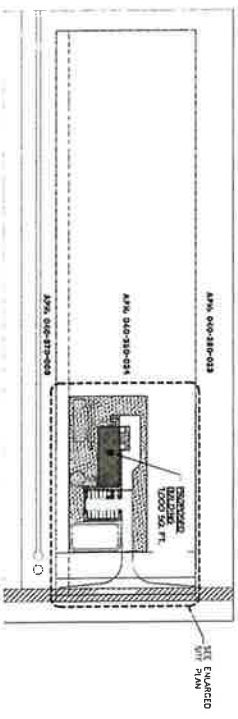
PROJECT NAME: HYDRAZINE FACILITY
LOCAL DESCRIPTION: 111 OLD HIGHWAY 111
TOWN: IMPERIAL
SITE AREA: 9.99 ACRES (441,740.00 SQ. FT.)
DEVELOPED AREA: 1,000 SQ. FT.
FRONTING LOT: 123.00 SQ. FT.
BUILDING USE: WAREHOUSE/OFFICE
TYPE OF CONSTRUCTION: V-B
PROPOSED BUILDING: 1,000 SQ. FT.
HEIGHT: 15'-0"
STORIES: 1
PARKING REQUIRED: 14 CUSTOMER REGULAR PARKING SPACES
PARKING PROVIDED: 15 DRIVE ALLEYS PARKING SPACES
LANDSCAPE REQUIRED: 15% OF THE UNDEVELOPED AREA, 15% X 21,500 SQ. FT.
LANDSCAPE PROVIDED: 15% OF THE UNDEVELOPED AREA, 15% X 21,500 SQ. FT.
RETENTION BASIN: 1,350 SQ. FT.
ON SITE: 1,350 SQ. FT.
TOTAL LANDSCAPE PROVIDED: 1,350 SQ. FT.

HATCH LEGEND

- PROPOSED BUILDING
- CONCRETE AREAS
- LANDSCAPE AREAS
- UNDEVELOPED AREA
- PROPERTY LINE
- ADJACENT PROPERTY LINE
- NCE 6' CHAIN-LINK FENCE
- EXIST OVERHEAD ELECTRICAL LINE
- NEW ELECTRICAL LINE
- EXIST POWER POLE
- LANDSCAPE PROVIDED

OVERALL PLAN

N.T.S.





Emergency Response Action Plan (ERAP) for RASIRC Imperial Facility

Prepared by

J. Kevin Selby
Director – EHS
RASIRC, Inc.

11/5/2024

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1. Introduction

Purpose

This ERAP (“Plan”) is designed to establish clear procedures for responding to emergencies, with a focus on hazardous materials, fire, and chemical containment, at the RASIRC facility in Imperial County, California. The Plan’s objective is to ensure the safety of employees, responders, the public, and the environment.

Scope

The plan applies to all staff, contractors, and visitors at the RASIRC facility and addresses potential emergencies such as fires, chemical spills, natural disasters, and hydrazine releases.

2. Facility Overview

Location

The RASIRC Imperial facility is located at GPS coordinates 32.90959271996148, -115.51144045909557, near the city of Brawley. The RASIRC facility processes and purifies hydrazine, a hazardous material, which is stored and used in specialized containment areas with built-in fire protection and ventilation systems.

Emergency Contacts

Imperial County

Imperial County Fire Department and Office of Emergency Services

Address: 1078 Dogwood Rd., Heber, CA 92249

Phone: (442) 265-6000

Website: [Imperial County Fire Department](#)

Imperial County Sheriff's Office

Address: 328 Applestill Road, El Centro, CA 92243

Phone: (442) 265-2021

Website: [Imperial County Fire Department](#)

Imperial County Public Health Department

Address: 935 Broadway St., El Centro, CA 92243

Phone: (442) 265-1444

Website: [ICPHD](#)

Imperial County Behavioral Health Services

Address: 202 N. 8th Street, El Centro, CA 92243

Phone: (442) 265-1525

Crisis Line: (800) 817-5292

Website: [Network of Care](#)

Imperial County Emergency Medical Services (EMS) Agency

Address: 935 Broadway St., El Centro, CA 92243

Phone: (442) 265-1444

Website: [ICPHD](#)

211 Imperial

Service: Provides health, social, community, and disaster information and referrals.

Phone: Dial 2-1-1

Website: [211 San Diego](#)

Center for Family Solutions

Service: Offers support for domestic violence and sexual assault victims.

Phone: (760) 353-8530

Website: [Network of Care](#)

Sure Helpline Crisis Center

Service: Provides crisis intervention and support services.

24-Hour Hotline: (760) 352-7873

Rape Hotline: (760) 352-7273

Website: [Network of Care](#)

Child Protective Services

Phone: (760) 337-7720

Website: [Network of Care](#)

Pioneers Memorial Healthcare District

Address: 207 W. Legion Rd., Brawley, CA 92227

Phone: (760) 351-3333

Website: <https://pmhd.org/>.

El Centro Regional Medical Center

Address: 1415 Ross Ave., El Centro, CA 92243

Phone: (760) 339-7100

Website: <https://www.ecrmc.org/>

For immediate emergencies, always dial **911**.

RASIRC

Name	Title	Plan Role	Telephone	E-Mail
Jeff Spiegelman	CEO, Founder	Crisis Commander		js@rasirc.com
J. Kevin Selby	Director – EHS	Incident Commander	858-902-9258	kselby@rasirc.com
Kurt Christian	Director – Construction	Incident Commander (back up)	719-287-5878	kchristian@rasirc.com

3. Risk Assessment and Emergency Identification

Potential Hazards

Fire: Risk from storage areas, process equipment, and electrical systems.

Chemical Spill/Release: Main risk from hydrazine and nitrogen gas.

Natural Disasters: Potential earthquakes and power outages in the region.

Hazardous Material Inventory: The following chemicals and their anticipated volumes are present on-site.

<u>Chemical</u>	<u>Storage (external)</u>	<u>Usage (internal)</u>
Nitrogen	3000 lbs.	
Hydrazine	20 liters	3 liters
Isopropanol	-----	20 liters
Hazardous Waste (solid)	20 lbs.	5 lbs.

See attached site layout (Appendix A) and facility maps (Appendix B) for storage/usage locations.

4. Emergency Procedures

Evacuation Plan

To ensure a safe and organized evacuation at the RASIRC facility, designated evacuation routes, assembly points, and procedures for accounting for personnel post-evacuation will be implemented:

Evacuation Routes

Primary Evacuation Routes: Clearly marked routes leading from work areas, storage rooms, and offices to exits. These routes should avoid hazardous material storage areas, including hydrazine and nitrogen storage, to minimize exposure risks.

Secondary Evacuation Routes: Alternate paths in case primary routes are blocked or unsafe. Secondary routes should be accessible from all facility areas and marked with visible exit signs.

Maps and Signage: Evacuation maps are posted throughout the facility, with color-coded arrows showing primary and secondary routes. Maps will be updated regularly to reflect any changes in facility layout.

Muster Points

Primary Muster Point: Designated in an open area a safe distance from the facility, downwind from hazardous material storage zones to minimize exposure in case of leaks. This area should have sufficient space to accommodate all facility personnel and visitors.

Alternate Muster Point: In case the primary location is compromised, an alternate assembly area is designated in a secure location at the opposite side of the facility grounds.

Signage: Assembly points are marked with visible signs, and all personnel are informed of these locations during new hire orientation and periodic safety briefings.

Post-Evacuation Personnel Accounting Steps

Emergency Coordinator: An Emergency Coordinator will be appointed for the RASIRC Imperial facility. In the event the Emergency Coordinator is not on-site, any Evacuation Warden is authorized to serve as the Emergency Coordinator.

Evacuation Wardens: Evacuation wardens are appointed for each facility section. Wardens will guide personnel during evacuation, ensure all areas are cleared, and report headcounts.

Headcount Procedure: Wardens conduct a headcount at muster points, cross-referencing against sign-in sheets or attendance records for employees, contractors, and visitors.

Visitor and Contractor Tracking: All visitors and contractors are required to sign in and out of the facility. This log is checked post-evacuation to confirm that all non-staff personnel are accounted for.

Reporting to Emergency Coordinator: Each warden reports their headcount and any missing individuals to the Emergency Coordinator, who compiles a final report and communicates it to emergency response teams if needed.

This structured approach ensures that all personnel are safely evacuated, accounted for, and kept at a safe distance from potential hazards, enabling a coordinated and efficient response during an emergency.

Fire Response

Throughout the facility, fire alarm and sprinkler systems are installed, with specialized firefighting equipment maintained near hydrazine storage areas.

Staff are instructed to prioritize evacuation unless a fire can be safely managed with available fire extinguishers.

Chemical Spill/Release

Hydrazine Containment: Hydrazine transfers are conducted in secondarily contained closed-loop systems with SCADA-linked detection monitors installed to initiate immediate process shutdown and alarm systems in case of leak detection.

Spill Cleanup: Procedures involve secondary containment measures, use of absorbent materials, and protective gear.

Medical Emergencies

Emergency showers, eye wash stations, and first aid kits are available to the site workforce.

Staff are trained in CPR/first aid/AED for general first aid, chemical exposure, and hydrazine exposure.

5. Communication and Coordination

Internal Alerts: The facility's fire/smoke detection system uses lights and alarms to inform staff of emergencies.

External Notifications: The RASIRC facility has established procedures for alerting external fire, hazmat, and medical services promptly in the event of an emergency. The notification includes the nature of the emergency and involved chemicals.

Incident Command System (ICS): The RASIRC emergency response program is based upon the structure established by the Federal Emergency Management Agency (FEMA) and the National Incident Management System (NIMS).

6. Training and Drills

Employee Training: Regular training on ERAP, spill response, and fire evacuation procedures are provided to all facility employees.

Emergency Drills: Drills are conducted annually for fire evacuation, spill response, and natural disaster preparedness, with records of each drill and debrief sessions for continuous improvement. Drills are also conducted with the implementation of new chemical introductions, facility modifications, or significant process changes.

7. Personal Protective Equipment (PPE) and Equipment Maintenance

PPE Requirements: Specific PPE, including respiratory protection, gloves, and fire-resistant clothing, are provided for each employee for each emergency type.

Equipment Maintenance: Regular inspection of fire extinguishers (monthly), alarm systems (quarterly), SCADA (quarterly), and all protective equipment (each time of use) are conducted to ensure the equipment is adequately maintained and ready for use.

8. Post-Incident Review

Incident Reporting: All emergencies, including causes and corrective actions, are documented and maintained by the RASIRC EHS organization.

Debrief and Cleanup: Post-incident de-briefs are conducted to ensure safe cleanup, waste disposal, regulatory reporting compliance, and continuous improvement. De-brief records and other documentation are maintained by the RASIRC EHS organization.

9. Recordkeeping

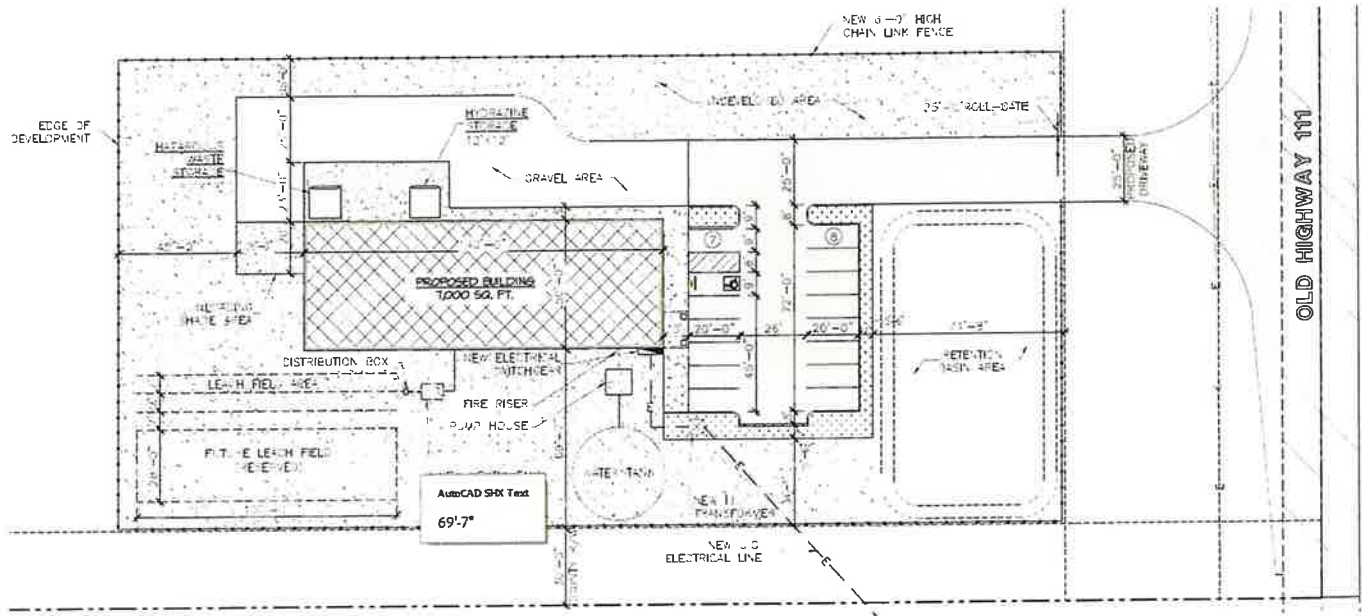
Document Control: The RASIRC EHS organization maintains relevant ERAP records, including training logs, drill records, and equipment inspections to ensure regulatory compliance.

10. Regulatory Compliance and Continuous Improvement

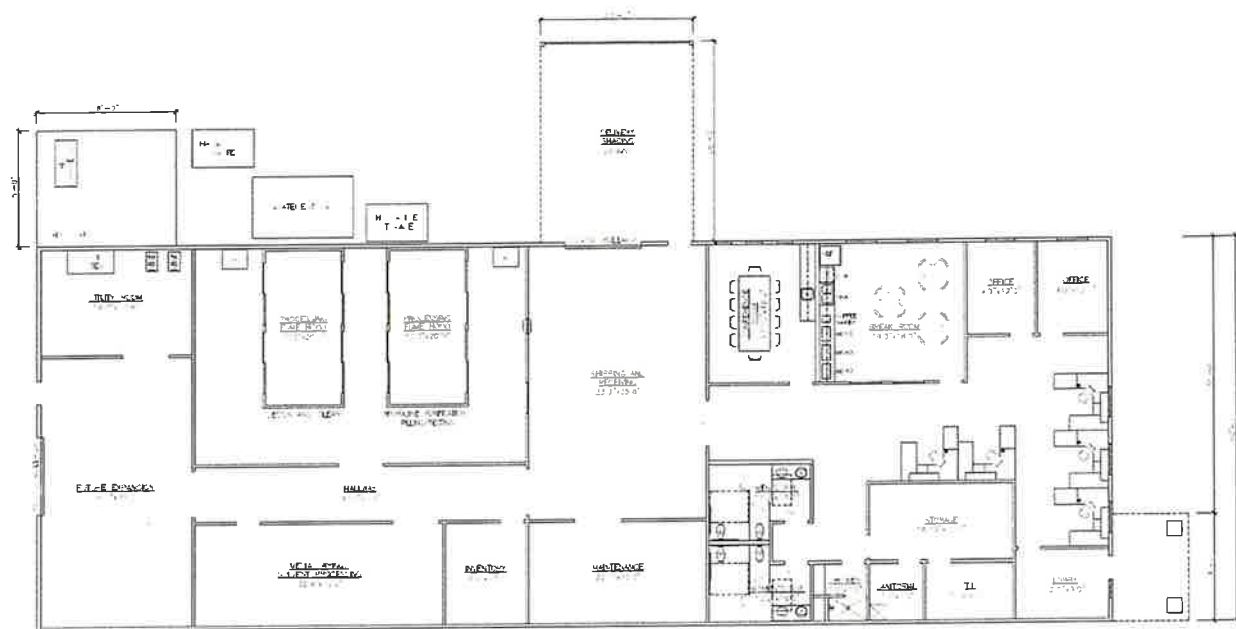
Regular updates and reviews of the ERAP are conducted with Imperial County Fire Department representatives to ensure continued compliance with local regulations and best practices.

This ERAP ensures that RASIRC is prepared for potential emergencies, supporting regulatory compliance and prioritizing the safety of staff and the local community.

Appendix A – Site Map



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SAFETY DATA SHEET

This safety data sheet was created pursuant to the requirements of:
US - OSHA Hazard Communication Standard (29 CFR 1910.1200)

Issuing Date 16-Nov-2017

Revision Date 30-Aug-2022

1. Identification

Product identifier

Product Name Brute Hydrazine

Other means of identification

Product Code(s) 110166

UN/ID no UN2029

Synonyms None

Recommended use of the chemical and restrictions on use

Recommended use Semiconductor Industry Use

Restrictions on use No information available

Details of the supplier of the safety data sheet

Supplier Address

RASIRC
7815 Silverton Ave.
San Diego, CA 92126
TEL: (858)-259-1220

Emergency telephone number

Emergency telephone 24-hour Emergency Phone: Infotrac 1-800-535-5053 (USA & Canada), 1-352-323-3500 (International)

2. Hazard(s) identification

Classification

This chemical is considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200).

Acute toxicity - Oral	Category 3
Acute toxicity - Dermal	Category 3
Acute toxicity - Inhalation (Dusts/Mists)	Category 4
Skin corrosion/irritation	Category 1 Sub-category B
Serious eye damage/eye irritation	Category 1
Skin sensitization	Category 1
Carcinogenicity	Category 1B
Flammable liquids	Category 3

Hazards not otherwise classified (HNOC)

Not applicable.

Label elements

Danger

Hazard statements

Toxic if swallowed.
Toxic in contact with skin.
Harmful if inhaled.
Causes severe skin burns and eye damage.
May cause an allergic skin reaction.
May cause cancer.
Flammable liquid and vapor.



Precautionary Statements - Prevention

Obtain special instructions before use.
Do not handle until all safety precautions have been read and understood.
Wear protective gloves/clothing and eye/face protection.
Wash face, hands and any exposed skin thoroughly after handling.
Do not eat, drink or smoke when using this product.
Use only outdoors or in a well-ventilated area.
Do not breathe dusts or mists.
Contaminated work clothing must not be allowed out of the workplace.
Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.
Keep container closed.
Ground and bond container and receiving equipment.
Use only non-sparking tools.
Take action to prevent static discharges.
Use explosion-proof electrical/ ventilating/ lighting/ equipment.

Precautionary Statements - Response

Immediately call a doctor.
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
Immediately call a doctor.
IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water/ shower.
Wash contaminated clothing before reuse.
If skin irritation or rash occurs: Get medical advice/attention.
IF INHALED: Remove person to fresh air and keep comfortable for breathing.
Immediately call a doctor.
IF SWALLOWED: Immediately call a doctor.
Rinse mouth.
Do NOT induce vomiting.
In case of fire: Use dry chemical, CO₂, water spray or alcohol-resistant foam to extinguish.

Precautionary Statements - Storage

Store locked up.
Store in a well-ventilated place. Keep cool.

Precautionary Statements - Disposal

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

Other information

Very toxic to aquatic life with long lasting effects. Very toxic to aquatic life.

3. Composition/information on ingredients**Substance**

Not applicable.

Mixture

Chemical name	CAS No	Weight-%	Trade secret
Hydrazine	302-01-2	50 - 65	*
Organic Proprietary Solvent	Trade secret	35 - 50	*

*The exact percentage (concentration) of composition has been withheld as a trade secret.

For more information on the proprietary organic solvent refer to RASIRC Document Number 900766, Question 5 in the BRUTE Hydrazine Safety FAQ.

4. First-aid measures**Description of first aid measures**

General advice	Show this safety data sheet to the doctor in attendance. Immediate medical attention is required, IF exposed or concerned: Get medical advice/attention.
Inhalation	Remove to fresh air. If breathing has stopped, give artificial respiration. Get medical attention immediately. Do not use mouth-to-mouth method if victim ingested or inhaled the substance; give artificial respiration with the aid of a pocket mask equipped with a one-way valve or other proper respiratory medical device. If breathing is difficult, (trained personnel should) give oxygen. Delayed pulmonary edema may occur. Get immediate medical attention.
Eye contact	Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. Keep eye wide open while rinsing. Do not rub affected area. Get immediate medical attention. Remove contact lenses, if present and easy to do. Continue rinsing.
Skin contact	Wash off immediately with soap and plenty of water while removing all contaminated clothes and shoes. Get immediate medical attention. May cause an allergic skin reaction.
Ingestion	Do NOT induce vomiting. Rinse mouth. Never give anything by mouth to an unconscious person. Get immediate medical attention.
Self-protection of the first aider	Remove all sources of ignition. Ensure that medical personnel are aware of the material(s) involved, take precautions to protect themselves and prevent spread of contamination. Use personal protective equipment as required. See section 8 for more information. Avoid direct contact with skin. Use barrier to give mouth-to-mouth resuscitation. Avoid contact with skin, eyes or clothing.

Most important symptoms and effects, both acute and delayed

Symptoms Burning sensation. Itching. Rashes. Hives.

Indication of any immediate medical attention and special treatment needed

Note to physicians

Product is a corrosive material. Use of gastric lavage or emesis is contraindicated. Possible perforation of stomach or esophagus should be investigated. Do not give chemical antidotes. Asphyxia from glottal edema may occur. Marked decrease in blood pressure may occur with moist rales, frothy sputum, and high pulse pressure. May cause sensitization in susceptible persons. Treat symptomatically.

5. Fire-fighting measures**Suitable Extinguishing Media**

Dry chemical. Carbon dioxide (CO₂). Water spray. Alcohol resistant foam.

Unsuitable extinguishing media

Do not use a solid water stream as it may scatter and spread fire.

Specific hazards arising from the chemical

Risk of ignition. Keep product and empty container away from heat and sources of ignition. In the event of fire, cool tanks with water spray. Fire residues and contaminated fire extinguishing water must be disposed of in accordance with local regulations. The product causes burns of eyes, skin and mucous membranes. Thermal decomposition can lead to release of irritating gases and vapors. Product is or contains a sensitizer. May cause sensitization by skin contact.

Explosion data

Sensitivity to mechanical impact None.

Sensitivity to static discharge Yes.

Special protective equipment and precautions for fire-fighters

Firefighters should wear self-contained breathing apparatus and full firefighting turnout gear. Use personal protection equipment.

6. Accidental release measures**Personal precautions, protective equipment and emergency procedures****Personal precautions**

Evacuate personnel to safe areas. Use personal protective equipment as required. See section 8 for more information. Avoid contact with skin, eyes or clothing. Ensure adequate ventilation. Keep people away from and upwind of spill/leak. ELIMINATE all ignition sources (no smoking, flares, sparks or flames in immediate area). Pay attention to flashback. Take precautionary measures against static discharges. All equipment used when handling the product must be grounded. Do not touch or walk through spilled material. Attention! Corrosive material.

Other information

Ventilate the area. Refer to protective measures listed in Sections 7 and 8.

Methods and material for containment and cleaning up**Methods for containment**

Stop leak if you can do it without risk. Do not touch or walk through spilled material. A vapor suppressing foam may be used to reduce vapors. Dike far ahead of spill to collect runoff water. Keep out of drains, sewers, ditches and waterways. Absorb with earth, sand or other non-combustible material and transfer to containers for later disposal.

Methods for cleaning up

Take precautionary measures against static discharges. Dam up. Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust). Pick up and transfer to properly labeled containers. Use non-sparking tools.

7. Handling and storage**Precautions for safe handling****Advice on safe handling**

Use personal protection equipment. Avoid breathing vapors or mists. Keep away from heat,

hot surfaces, sparks, open flames and other ignition sources. No smoking. Use grounding and bonding connection when transferring this material to prevent static discharge, fire or explosion. Use spark-proof tools and explosion-proof equipment. Keep in an area equipped with sprinklers. Use according to package label instructions. Handle in accordance with good industrial hygiene and safety practice. Avoid contact with skin, eyes or clothing. Take off contaminated clothing and wash before reuse. In case of insufficient ventilation, wear suitable respiratory equipment. Handle product only in closed system or provide appropriate exhaust ventilation. Do not eat, drink or smoke when using this product.

Conditions for safe storage, including any incompatibilities

Storage Conditions

Keep containers tightly closed in a dry, cool and well-ventilated place. Keep away from heat, sparks, flame and other sources of ignition (i.e., pilot lights, electric motors and static electricity). Keep in properly labeled containers. Do not store near combustible materials. Keep in an area equipped with sprinklers. Store in accordance with the particular national regulations. Store in accordance with local regulations. Keep out of the reach of children. Store locked up. Protect from moisture. Store away from other materials. Acids such as hydrochloric, sulfuric, and nitric, and oxidizers like hypochlorites, hydrogen peroxide, permanganates, chromates etc. should be avoided in areas where hydrazine is handled or stored.

8. Exposure controls/personal protection

Control parameters

Exposure Limits

Chemical name	ACGIH TLV	OSHA PEL	NIOSH
Hydrazine 302-01-2	TWA: 0.01 ppm S*	TWA: 1 ppm TWA: 1.3 mg/m ³ (vacated) TWA: 0.1 ppm (vacated) TWA: 0.1 mg/m ³ (vacated) S* S*	IDLH: 50 ppm Ceiling: 0.03 ppm 2 hr Ceiling: 0.04 mg/m ³ 2 hr

Appropriate engineering controls

Engineering controls

Showers
Eyewash stations
Ventilation systems.

Individual protection measures, such as personal protective equipment

Eye/face protection

Tight sealing safety goggles. Face protection shield.

Hand protection

Wear suitable gloves. Impervious gloves.

Skin and body protection

Wear suitable protective clothing. Long sleeved clothing. Chemical resistant apron. Antistatic boots.

Respiratory protection

No protective equipment is needed under normal use conditions. If exposure limits are exceeded or irritation is experienced, ventilation and evacuation may be required.

General hygiene considerations

Do not eat, drink or smoke when using this product. Contaminated work clothing must not be allowed out of the workplace. Regular cleaning of equipment, work area and clothing is recommended. Wash hands before breaks and immediately after handling the product.

Avoid contact with skin, eyes or clothing. Wear suitable gloves and eye/face protection.
Remove and wash contaminated clothing and gloves, including the inside, before re-use.

9. Physical and chemical properties

Information on basic physical and chemical properties

Appearance	
Physical state	Liquid
Color	Colorless
Odor	Ammonia, Amine
Odor threshold	No data available

<u>Property</u>	<u>Values</u>	<u>Remarks • Method</u>
pH	16.3	
Melting point / freezing point	-25.0 °C / -13 °F	
Initial boiling point and boiling range	116.2 °C / 241.2 °F	ASTM D2879
Flash point	46.7 °C / 116.1 °F	ASTM E1232
Evaporation rate		No data available
Flammability		Flammable liquid
Flammability Limit in Air		
Upper flammability or explosive limits	51.0% @ 125°C	Estimated using Le Chatelier's Principle; ASTM E681
Lower flammability or explosive limits	3.3 % @ 125°C	ASTM E681
Vapor pressure	14 Torr @ 20.0°C	ASTM D2879
Vapor density	1.1	(air = 1)
Relative density	1.05 @ 20.0 °C (68.0 °F)	
Water solubility	Miscible in water	
Solubility(ies)		Not applicable
Partition coefficient		Not determined
Autoignition temperature	217.0 °C / 422.6 °F	ASTM E659
Decomposition temperature	150.3 °C / 302.5 °F	on passivated 316 Stainless Steel; ARC method
Kinematic viscosity		Not determined
Dynamic viscosity		Not determined
Other information		
Explosive properties	At 46.7°C explosive mixtures may be formed	
Oxidizing properties	Not applicable	
Softening point	No information available	
Molecular weight	No information available	
VOC content	No information available	
Liquid Density	No information available	
Bulk density	No information available	

10. Stability and reactivity

Reactivity	None under normal use conditions.
Chemical stability	Stable under normal conditions.
Possibility of hazardous reactions	Hydrazine and water form an azeotropic mixture which boils at 120.3°C (760 mm Hg) containing 58.5 mole % hydrazine. Reacts readily and exothermically with most oxidizing agents, and mineral acids. The intensity of the reactions of hydrazine with oxidizers or acids is dependent upon the concentration of the reactants. The lower the hydrazine concentration, the milder the reaction.
Hazardous polymerization	Hazardous polymerization does not occur.

Conditions to avoid	Heat, flames and sparks. Exposure to air or moisture over prolonged periods.
Incompatible materials	Strong oxidizing agents. Calcium oxides. Chlorine. Fluorine. Oxygen. Copper. Zinc. Alkali metals. Chromates. Mineral acids.
Hazardous decomposition products	Nitrogen oxides (NOx).

11. Toxicological information

Information on likely routes of exposure

Product Information

Inhalation	Specific test data for the substance or mixture is not available. Corrosive by inhalation. (based on components). Inhalation of corrosive fumes/gases may cause coughing, choking, headache, dizziness, and weakness for several hours. Pulmonary edema may occur with tightness in the chest, shortness of breath, bluish skin, decreased blood pressure, and increased heart rate. Inhaled corrosive substances can lead to a toxic edema of the lungs. Pulmonary edema can be fatal.
Eye contact	Specific test data for the substance or mixture is not available. Causes serious eye damage. (based on components). Corrosive to the eyes and may cause severe damage including blindness. May cause irreversible damage to eyes.
Skin contact	Specific test data for the substance or mixture is not available. Corrosive. (based on components). Causes burns. May cause sensitization by skin contact. Repeated or prolonged skin contact may cause allergic reactions with susceptible persons. Toxic in contact with skin.
Ingestion	Specific test data for the substance or mixture is not available. Causes burns. (based on components). Ingestion causes burns of the upper digestive and respiratory tracts. May cause severe burning pain in the mouth and stomach with vomiting and diarrhea of dark blood. Blood pressure may decrease. Brownish or yellowish stains may be seen around the mouth. Swelling of the throat may cause shortness of breath and choking. May cause lung damage if swallowed. May be fatal if swallowed and enters airways.

Symptoms related to the physical, chemical and toxicological characteristics

Symptoms	Redness. Burning. May cause blindness. Coughing and/ or wheezing. Itching. Rashes. Hives.
-----------------	---

Acute toxicity

Numerical measures of toxicity

The following values are calculated based on chapter 3.1 of the GHS document:

ATEmix (oral)	92.30 mg/kg
ATEmix (dermal)	461.50 mg/kg
ATEmix (inhalation-dust/mist)	1.0708 mg/l

Component Information

Chemical name	Oral LD50	Dermal LD50	Inhalation LC50
Hydrazine 302-01-2	= 60 mg/kg (Rat)	= 91 mg/kg (Rabbit)	= 0.75 mg/L (Rat) 4 h
Organic Proprietary Solvent	= 17 g/kg (Rat)	> 20 mL/kg (Rabbit)	> 5.2 mg/L (Rat) 4 h

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Skin corrosion/irritation	Classification based on data available for ingredients. Causes severe skin burns and eye damage.
Serious eye damage/eye irritation	Classification based on data available for ingredients. Causes serious eye damage. Causes burns.
Respiratory or skin sensitization	May cause an allergic skin reaction.
Germ cell mutagenicity	No information available.
Carcinogenicity	Contains a known or suspected carcinogen. Classification based on data available for ingredients. May cause cancer.

The table below indicates whether each agency has listed any ingredient as a carcinogen.

Chemical name	ACGIH	IARC	NTP	OSHA
Hydrazine 302-01-2	A3	Group 2A	Reasonably Anticipated	X

Legend

ACGIH (American Conference of Governmental Industrial Hygienists)

A3 - Animal Carcinogen

IARC (International Agency for Research on Cancer)

Group 2A - Probably Carcinogenic to Humans

NTP (National Toxicology Program)

Reasonably Anticipated - Reasonably Anticipated to be a Human Carcinogen

OSHA (Occupational Safety and Health Administration of the US Department of Labor)

X - Present

Reproductive toxicity	No information available.
STOT - single exposure	No information available.
STOT - repeated exposure	No information available.
Target organ effects	Liver, Kidney, Respiratory system, Eyes, Skin, Central nervous system, Blood, Lungs.
Aspiration hazard	No information available.
Other adverse effects	No information available.
Interactive effects	No information available.

12. Ecological information

Ecotoxicity Very toxic to aquatic life with long lasting effects.

Chemical name	Algae/aquatic plants	Fish	Toxicity to microorganisms	Crustacea
Hydrazine 302-01-2	EC50: =0.071mg/L (72h, Pseudokirchneriella subcapitata) EC50: =0.006mg/L (72h, Pseudokirchneriella subcapitata) EC50: =0.02mg/L (96h,	LC50: 0.7 - 1.3mg/L (96h, Lepomis macrochirus) LC50: 0.54 - 1.31mg/L (96h, Lepomis macrochirus) LC50: =1.17mg/L (96h,	-	-

	Pseudokirchneriella subcapitata)	Lepomis macrochirus) LC50: 1.81 - 2.79mg/L (96h, Pimephales promelas) LC50: 0.28 - 1.34mg/L (96h, Poecilia reticulata)		
Organic Proprietary Solvent	-	LC50: 56200 - 63700mg/L (96h, Pimephales promelas) LC50: =10000mg/L (96h, Lepomis macrochirus) LC50: =61000mg/L (96h, Lepomis macrochirus)	-	EC50: =42426mg/L (48h, Daphnia magna)

Persistence and degradability No information available.

Bioaccumulation

Component Information

Chemical name	Partition coefficient
Hydrazine 302-01-2	-0.16
Organic Proprietary Solvent	-1.98

Other adverse effects No information available.

13. Disposal considerations

Waste treatment methods

Waste from residues/unused products Should not be released into the environment. Dispose of in accordance with local regulations. Dispose of waste in accordance with environmental legislation.

Contaminated packaging Empty containers pose a potential fire and explosion hazard. Do not cut, puncture or weld containers.

14. Transport information

DOT

UN/ID no	UN2029
Proper shipping name	HYDRAZINE, ANHYDROUS
Transport hazard class(es)	8
Subsidiary class	3, 6.1
Packing group	I
Reportable Quantity (RQ)	(Hydrazine: RQ (kg)= 0.454) Hydrazine: RQ (lb)= 1
Reportable quantity kg (calculated)	Hydrazine: RQ (kg)= 1
Reportable quantity lbs. (calculated)	Hydrazine: RQ (lb)= 2
Special Provisions	A7, A10, B7, B16, B53
DOT Marine Pollutant	I
Marine pollutant	Hydrazine
Description	UN2029, HYDRAZINE, ANHYDROUS, 8 (3, 6.1), I, Marine pollutant
Emergency Response Guide	132

Number**IATA**

UN number or ID number UN2029
 UN proper shipping name Hydrazine, anhydrous
 Transport hazard class(es) 8
 Subsidiary hazard class 3, 6.1
 Packing group I
 Description UN2029, Hydrazine, anhydrous, 8 (3, 6.1), I
 ERG Code 8FP

IMDG

UN number or ID number UN2029
 UN proper shipping name HYDRAZINE, ANHYDROUS
 Transport hazard class(es) 8
 Subsidiary hazard class 3, 6.1
 Packing group I
 EmS-No F-E, S-C
 Marine pollutant P
 Description UN2029, HYDRAZINE, ANHYDROUS, 8 (3, 6.1), I, (46.7°C C.C.), Marine pollutant

15. Regulatory information**International Inventories**

Contact supplier for inventory compliance status

US Federal Regulations**SARA 313**

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372.

Chemical name	SARA 313 - Threshold Values %
Hydrazine - 302-01-2	0.1

SARA 311/312 Hazard Categories

Should this product meet EPCRA 311/312 Tier reporting criteria at 40 CFR 370, refer to Section 2 of this SDS for appropriate classifications.

CWA (Clean Water Act)

This product does not contain any substances regulated as pollutants pursuant to the Clean Water Act (40 CFR 122.21 and 40 CFR 122.42).

CERCLA

This material, as supplied, contains one or more substances regulated as a hazardous substance under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302).

Chemical name	Hazardous Substances RQs	Extremely Hazardous Substances RQs	Reportable Quantity (RQ)
Hydrazine 302-01-2	1 lb	1 lb	RQ 1 lb final RQ RQ 0.454 kg final RQ

US State Regulations

California Proposition 65

This product contains the following Proposition 65 chemicals:

Chemical name	California Proposition 65
Hydrazine - 302-01-2	Carcinogen

U.S. State Right-to-Know Regulations

Chemical name	New Jersey	Massachusetts	Pennsylvania
Hydrazine 302-01-2	X	X	X
Organic Proprietary Solvent	-	-	X

U.S. EPA Label Information

EPA Pesticide Registration Number Not applicable

16. Other information

NFPA	Health hazards 3	Flammability 2	Instability 1	Special hazards -
HMIS	Health hazards 3 *	Flammability 2	Physical hazards 1	Personal protection X
<i>Chronic Hazard Star Legend</i>		<i>* = Chronic Health Hazard</i>		

Key or legend to abbreviations and acronyms used in the safety data sheet**Legend Section 8: EXPOSURE CONTROLS/PERSONAL PROTECTION**

TWA	TWA (time-weighted average)	STEL	STEL (Short Term Exposure Limit)
Ceiling	Maximum limit value	*	Skin designation

Key literature references and sources for data used to compile the SDS

Agency for Toxic Substances and Disease Registry (ATSDR)
 U.S. Environmental Protection Agency ChemView Database
 European Food Safety Authority (EFSA)
 EPA (Environmental Protection Agency)
 Acute Exposure Guideline Level(s) (AELG(s))
 U.S. Environmental Protection Agency Federal Insecticide, Fungicide, and Rodenticide Act
 U.S. Environmental Protection Agency High Production Volume Chemicals
 Food Research Journal
 Hazardous Substance Database
 International Uniform Chemical Information Database (IUCRID)
 Japan GHS Classification
 Australia National Industrial Chemicals Notification and Assessment Scheme (NICNAS)
 NIOSH (National Institute for Occupational Safety and Health)
 National Library of Medicine's ChemID Plus (NLM CIP)
 National Library of Medicine's PubMed database (NLM PUBMED)
 National Toxicology Program (NTP)
 New Zealand's Chemical Classification and Information Database (CCID)
 Organization for Economic Co-operation and Development Environment, Health, and Safety Publications
 Organization for Economic Co-operation and Development High Production Volume Chemicals Program
 Organization for Economic Co-operation and Development Screening Information Data Set
 World Health Organization

Issuing Date 16-Nov-2017

Revision Date 30-Aug-2022

Revision Note

Updated format. Change to classification.

Disclaimer

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

End of Safety Data Sheet

SAFETY DATA SHEET

according to US Regulation 29 CFR 1910.1200 and the Canadian HPA

ULTRA PURE™ HYDRAZINE 5F

Version 1.2

Revision Date 2020.05.11

Print Date 2020.06.24

SECTION 1. IDENTIFICATION

Product name : ULTRA PURE™ HYDRAZINE 5F

Manufacturer or supplier's details

Company : Arch Chemicals, Inc.
1400 Bluegrass Lakes Parkway
Alpharetta, GA
30004
United States of America (USA)

Telephone : +1 770 521-5999
Telefax : +1 770 521-5950
E-mail address : sds-info@lonza.com

Emergency telephone number : For incidents only (spill, leak, fire, exposure, or accident), call
CHEMTREC at
1-800-424-9300 (inside North America) [CCN 864796]
1-703-741-5970 (outside North America) [CCN 864796]

+41 61 313 94 94 (24h)

Recommended use of the chemical and restrictions on use

Recommended use : Aerospace fuel component.

SECTION 2. HAZARDS IDENTIFICATION

GHS Classification

Flammable liquids : Category 3
Acute toxicity (Oral) : Category 3
Acute toxicity (Inhalation) : Category 2
Acute toxicity (Dermal) : Category 2
Skin corrosion : Category 1B
Serious eye damage : Category 1
Skin sensitisation : Sub-category 1B
Carcinogenicity : Category 1B
Short-term (acute) aquatic hazard : Category 1
Long-term (chronic) aquatic hazard : Category 1

GHS label elements

ULTRA PURE™ HYDRAZINE 5F

Hazard pictograms



Signal word

: Danger

Hazard statements

: H226 Flammable liquid and vapour.
H301 Toxic if swallowed.
H310 + H330 Fatal in contact with skin or if inhaled.
H314 Causes severe skin burns and eye damage.
H317 May cause an allergic skin reaction.
H350 May cause cancer.
H410 Very toxic to aquatic life with long lasting effects.

Precautionary statements

: **Prevention:**
P201 Obtain special instructions before use.
P202 Do not handle until all safety precautions have been read and understood.
P210 Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.
P233 Keep container tightly closed.
P240 Ground and bond container and receiving equipment.
P241 Use explosion-proof electrical/ ventilating/ lighting equipment.
P242 Use non-sparking tools.
P243 Take action to prevent static discharges.
P260 Do not breathe dust/ fume/ gas/ mist/ vapours/ spray.
P262 Do not get in eyes, on skin, or on clothing.
P264 Wash skin thoroughly after handling.
P270 Do not eat, drink or smoke when using this product.
P271 Use only outdoors or in a well-ventilated area.
P272 Contaminated work clothing should not be allowed out of the workplace.
P273 Avoid release to the environment.
P280 Wear protective gloves/ protective clothing/ eye protection/ face protection.
P284 Wear respiratory protection.
Response:
P301 + P310 + P330 IF SWALLOWED: Immediately call a POISON CENTER/ doctor. Rinse mouth.
P301 + P330 + P331 IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.
P303 + P361 + P353 IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water.
P304 + P340 + P310 IF INHALED: Remove person to fresh air and keep comfortable for breathing. Immediately call a POISON CENTER/ doctor.
P305 + P351 + P338 + P310 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER/ doctor.
P308 + P313 IF exposed or concerned: Get medical advice/ attention.
P333 + P313 If skin irritation or rash occurs: Get medical advice/

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attention.

P361 + P364 Take off immediately all contaminated clothing and wash it before reuse.

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

P391 Collect spillage.

Storage:

P403 + P233 Store in a well-ventilated place. Keep container tightly closed.

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

P405 Store locked up.

Disposal:

P501 Dispose of contents/container in accordance with local regulation.

Other hazards

None known.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical nature : Hydrazine

Hazardous components

Chemical name / Synonyms	CAS-No.	Concentration (% w/w)
Hydrazine	302-01-2	90 - 100

SECTION 4. FIRST AID MEASURES

If inhaled	: Remove to fresh air. Seek medical attention if breathing becomes difficult or if respiratory irritation develops. If not breathing, give artificial respiration. Call for medical assistance.
In case of skin contact	: Wash off immediately with plenty of water for at least 15 minutes. Wash contaminated clothing before re-use. Consult a physician.
In case of eye contact	: Rinse immediately with plenty of water for at least 15 minutes. Seek medical attention immediately.
If swallowed	: DO NOT induce vomiting or give anything by mouth to an unconscious or convulsing person. Call a physician immediately.
Most important symptoms and effects, both acute and delayed	: None known.
Notes to physician	: Pyridoxine (Vitamin B6) has been used successfully to treat the neurological symptoms of hydrazine exposure.

ULTRA PURE™ HYDRAZINE 5F

SECTION 5. FIREFIGHTING MEASURES

- | | |
|--------------------------------------|---|
| Suitable extinguishing media | : Use alcohol foam, carbon dioxide, dry chemical or water spray when fighting fires. |
| Specific hazards during firefighting | : Material may be ignited if preheated to temperatures above the flash point in the presence of a source of ignition.
Can form explosive mixtures at temperatures at or above the flash point. |
| Further information | : In case of fire, use normal fire-fighting equipment and the personal protective equipment recommended in Section 8 to include a NIOSH approved self-contained breathing apparatus.

Response to this material requires the use of a full encapsulated suit and full-face (NIOSH approved) self-contained breathing apparatus (SCBA).
Use water to cool containers. |

SECTION 6. ACCIDENTAL RELEASE MEASURES

- | | |
|---|---|
| Personal precautions, protective equipment and emergency procedures | : Response to this material requires the use of a full encapsulated suit and full-face (NIOSH approved) self-contained breathing apparatus (SCBA). |
| Environmental precautions | : Remove all sources of ignition.
If this material is released into a work area, evacuate the area immediately.
Hazardous concentrations in air may be found in local spill area and immediately downwind.
Utilize emergency response personal protection equipment prior to the start of any response.
Stop source of spill as soon as possible and notify appropriate personnel.
This material may be neutralized for disposal; you are requested to contact Arch Chemicals at 1-800-654-6911 before beginning any such procedure.
Decontaminate all clothing and the spill area using a detergent and flush with large amounts of water. |

SECTION 7. HANDLING AND STORAGE

- | | |
|-----------------------------|--|
| Advice on safe handling | : Avoid contact with material, avoid breathing vapors, use only in a well ventilated area, use bonding and grounding when transferring quantities of material.
Do not take internally. Avoid contact with skin, eyes and clothing. Upon contact with skin or eyes, wash off with water. |
| Conditions for safe storage | : Store in a cool dry ventilated location, away from sources of ignition or other incompatible conditions and chemicals. Keep container(s) closed.
Avoid direct exposure to sunlight or ultraviolet (UV) light sources. |

ULTRA PURE™ HYDRAZINE 5F

Keep under a nitrogen blanket.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
Hydrazine	302-01-2	TWA	0.01 ppm	ACGIH
		Ceil_Time	0.03 ppm 0.04 mg/m3	NIOSH/GUIDE

Engineering measures

- Use only in area provided with appropriate exhaust ventilation.
Maintain air concentrations below occupational exposure standards.

Personal protective equipment

Respiratory protection

- Wear a NIOSH approved respirator if any exposure occurs.

Filter type

- NIOSH approved full-face positive pressure supplied-air respirator

Eye protection

- Goggles
Face-shield

Skin and body protection

- Gloves
Boots
Apron
Wear the following impervious coverall material:
butyl-rubber
Neoprene
Nitrile rubber

Protective measures

- Ensure that eyewash stations and safety showers are close to the workstation location.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance

- liquid

Colour

- colourless

Odour

- Ammonia

Odour Threshold

- no data available

pH

- 10.1 - 10.7 (77 °F / 25 °C)
Concentration: 10 g/l

Melting point/range

- 34.7 °F / 1.5 °C

ULTRA PURE™ HYDRAZINE 5F

Boiling point/boiling range	: 236.3 °F / 113.5 °C
Flash point	: 126 °F / 52 °C
	Method: DIN 51376
Evaporation rate	: no data available
Flammability (solid, gas)	: Flammable
Flammability (liquids)	: no data available
Upper explosion limit	: 100 %(V)
Lower explosion limit	: 4.7 %(V)
Vapour pressure	: 19.817 hPa (77 °F / 25 °C)
Relative vapour density	: 1.1
Relative density	: 1.004
Density	: 1.004 g/cm3
Water solubility	: completely miscible
Partition coefficient: n-octanol/water	: no data available
Auto-ignition temperature	: 518 °F / 270 °C
	Method: Test Method: US Bureau of Mines Bulletin 627:
Decomposition temperature	: 518 °F / 270 °C
Viscosity, dynamic	: no data available
Viscosity, kinematic	: no data available
Oxidizing properties	: no data available
Molecular weight	: 32.04 g/mol

SECTION 10. STABILITY AND REACTIVITY

Conditions to avoid	: Do not expose to temperatures above: 51 °C Temperatures above the flash point in combination with sparks, open flames, or other sources of ignition.
	Contact with incompatible substances
Incompatible materials	: Strong oxidizing agents Peroxides nitrogen tetroxide fuming nitric acid fluorine, halogen fluorides metal oxides such as those of iron, copper, lead, manganese, and molybdenum Package only in Teflon® high density polyethylene or 304L or

ULTRA PURE™ HYDRAZINE 5F

347 stainless steels containing less than 0.5% molybdenum.

Hazardous decomposition products : Ammonia
Hydrogen

SECTION 11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure : Inhalation, skin, eyes, ingestion
sure

Acute toxicity

Acute oral toxicity : LD50 (Rat): 60 mg/kg

Acute inhalation toxicity : LC50 (Rat): 0.747 mg/l
Exposure time: 4 h
Test atmosphere: vapour

Acute dermal toxicity : LD50 (Rabbit): 91 mg/kg

Skin corrosion/irritation

Result: Corrosive to skin

Serious eye damage/eye irritation

Result: Corrosive to eyes

Respiratory or skin sensitisation

Test Type: Patch Test 24 Hrs.

Species: Humans

Result: May cause sensitisation by skin contact.

Carcinogenicity

IARC	Group 2A: Probably carcinogenic to humans	
	Hydrazine	302-01-2

OSHA	No component of this product present at levels greater than or equal to 0.1% is on OSHA's list of regulated carcinogens.
-------------	--

NTP	Anticipated carcinogen.	
	Hydrazine	302-01-2

ACGIH	Confirmed animal carcinogen with unknown relevance to humans	
	Hydrazine	302-01-2

Repeated dose toxicity

Target Organs: Liver, Kidney, Central nervous system, Lungs

SECTION 12. ECOLOGICAL INFORMATION

Ecotoxicity

ULTRA PURE™ HYDRAZINE 5F

Toxicity to fish : LC50 (Pimephales promelas (fathead minnow)): 5.98 mg/l
Exposure time: 96 h
Analytical monitoring: yes
Method: OECD Test Guideline 203
GLP: no

Toxicity to daphnia and other aquatic invertebrates : EC50 (Daphnia pulex (Water flea)): 0.175 mg/l
Exposure time: 48 h
Test Type: Immobilization
Method: EPA-660/3-75-009

Toxicity to microorganisms : EC10 (Pseudomonas putida): 0.019 mg/l
Exposure time: 16 h
Test Type: Growth inhibition

Persistence and degradability

Biodegradability : Remarks: Not applicable

Bioaccumulative potential

Components:

Hydrazine:

Partition coefficient: n-octanol/water : log Pow: -1.37

Mobility in soil

no data available

Other adverse effects

Ozone-Depletion Potential : Regulation: US. EPA Clean Air Act (CAA) Section 602 Ozone-Depleting Substances (40 CFR 82, Subpt. A, App A & B)
Remarks: This product neither contains, nor was manufactured with a Class I or Class II ODS as defined by the U.S. Clean Air Act Section 602 (40 CFR 82, Subpt. A, App.A + B).

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal methods

Waste from residues : If this product becomes a waste, it will be a hazardous waste. As a hazardous liquid waste it must be disposed of in accordance with local, state and federal regulations.

SECTION 14. TRANSPORT INFORMATION

ULTRA PURE™ HYDRAZINE 5F

DOT

UN number	: 2029
Proper shipping name	: Hydrazine, anhydrous
Transport hazard class	: 8
Packing group	: I
Labels	: 8 (3, 6.1)
Emergency Response Guidebook Number	: 132
Environmental hazards	: yes

TDG

UN number	: 2029
Proper shipping name	: HYDRAZINE, ANHYDROUS
Transport hazard class	: 8
Packing group	: I
Labels	: 8 (3, 6.1)
Environmental hazards	: yes

IATA

UN number	: 2029
Proper shipping name	: Hydrazine, anhydrous
Transport hazard class	: 8
Packing group	: I
Labels	: 8 (3, 6.1)

IATA Passenger

UN number	: 2029
Transport hazard class	: 8
	: Not permitted for transport
Environmental hazards	: no

IMDG

UN number	: 2029
Proper shipping name	: Hydrazine, anhydrous
Transport hazard class	: 8
Packing group	: I
Labels	: 8 (3, 6.1)
EmS Number 1	: F-E
EmS Number 2	: S-C
Environmental hazards	: Marine pollutant: yes

ADR

UN number	: 2029
Transport hazard class	: 8
	: Not permitted for transport
Environmental hazards	: yes

ULTRA PURE™ HYDRAZINE 5F

RID

UN number	: 2029
Transport hazard class	: 8
Environmental hazards	: Not permitted for transport : yes
Special precautions for user	: none
Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code	: Not applicable

SECTION 15. REGULATORY INFORMATION

EPCRA - Emergency Planning and Community Right-to-Know Act

CERCLA Reportable Quantity

Components	CAS-No.	Component RQ (lbs)	Calculated product RQ (lbs)
Hydrazine	302-01-2	1	1

SARA 304 Extremely Hazardous Substances Reportable Quantity

Components	CAS-No.	Component RQ (lbs)	Calculated product RQ (lbs)
Hydrazine	302-01-2	1	1

SARA 311/312 Hazards

See above: SECTION 2. Hazard Identification-GHS Classification

SARA 313

Components	CAS-No.	Concentration
Hydrazine	302-01-2	>= 90 - <= 100 %

Clean Air Act

This product neither contains, nor was manufactured with a Class I or Class II ODS as defined by the U.S. Clean Air Act Section 602 (40 CFR 82, Subpt. A, App.A + B).

The following chemical(s) are listed as HAP under the U.S. Clean Air Act, Section 112 (40 CFR 61):

Components	CAS-No.	Concentration
Hydrazine	302-01-2	>= 90 - <= 100 %

The following chemical(s) are listed under the U.S. Clean Air Act Section 112(r) for Accidental Release Prevention (40 CFR 68.130, Subpart F):

Components	CAS-No.	Concentration
Hydrazine	302-01-2	>= 90 - <= 100 %

ULTRA PURE™ HYDRAZINE 5F

This product does not contain any chemicals listed under the U.S. Clean Air Act Section 111 SOCM I Intermediate or Final VOC's (40 CFR 60.489).

This product does not contain any VOC exemptions listed under the U.S. Clean Air Act Section 450.

Clean Water Act

This product does not contain any Hazardous Chemicals listed under the U.S. CleanWater Act, Section 311, Table 117.3.

This product does not contain any Hazardous Substances listed under the U.S. CleanWater Act, Section 311, Table 116.4A.

This product does not contain any toxic pollutants listed under the U.S. Clean Water Act Section 307

US State Regulations

Massachusetts Right To Know

Components	CAS-No.
Hydrazine	302-01-2

Pennsylvania Right To Know

Components	CAS-No.
Hydrazine	302-01-2

California Prop. 65



WARNING Cancer - www.P65Warnings.ca.gov.

Components	CAS-No.
Hydrazine	302-01-2

Canadian lists

NPRI

Components	CAS-No.
Hydrazine	302-01-2

The components of this product are reported in the following inventories:

TSCA : The components of this product are listed on the TSCA Inventory of Existing Chemical Substances.

TSCA : The components of this product are listed on the TSCA Inventory of Existing Chemical Substances.

SECTION 16. OTHER INFORMATION

ULTRA PURE™ HYDRAZINE 5F

Full text of other abbreviations

ACGIH : US. ACGIH Threshold Limit Values
NIOSH/GUIDE : US. NIOSH: Pocket Guide to Chemical Hazards, as amended

AICS - Australian Inventory of Chemical Substances; ASTM - American Society for the Testing of Materials; bw - Body weight; CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act; CMR - Carcinogen, Mutagen or Reproductive Toxicant; DIN - Standard of the German Institute for Standardisation; DOT - Department of Transportation; DSL - Domestic Substances List (Canada); ECx - Concentration associated with x% response; EHS - Extremely Hazardous Substance; ELx - Loading rate associated with x% response; EmS - Emergency Schedule; ENCS - Existing and New Chemical Substances (Japan); ErCx - Concentration associated with x% growth rate response; ERG - Emergency Response Guide; GHS - Globally Harmonized System; GLP - Good Laboratory Practice; HMIS - Hazardous Materials Identification System; IARC - International Agency for Research on Cancer; IATA - International Air Transport Association; IBC - International Code for the Construction and Equipment of Ships carrying Dangerous Chemicals in Bulk; IC50 - Half maximal inhibitory concentration; ICAO - International Civil Aviation Organization; IECSC - Inventory of Existing Chemical Substances in China; IMDG - International Maritime Dangerous Goods; IMO - International Maritime Organization; ISHL - Industrial Safety and Health Law (Japan); ISO - International Organisation for Standardization; KECI - Korea Existing Chemicals Inventory; LC50 - Lethal Concentration to 50 % of a test population; LD50 - Lethal Dose to 50% of a test population (Median Lethal Dose); MARPOL - International Convention for the Prevention of Pollution from Ships; MSHA - Mine Safety and Health Administration; n.o.s. - Not Otherwise Specified; NFPA - National Fire Protection Association; NO(A)EC - No Observed (Adverse) Effect Concentration; NO(A)EL - No Observed (Adverse) Effect Level; NOELR - No Observable Effect Loading Rate; NTP - National Toxicology Program; NZIoC - New Zealand Inventory of Chemicals; OECD - Organization for Economic Co-operation and Development; OPPTS - Office of Chemical Safety and Pollution Prevention; PBT - Persistent, Bioaccumulative and Toxic substance; PICCS - Philippines Inventory of Chemicals and Chemical Substances; (Q)SAR - (Quantitative) Structure Activity Relationship; RCRA - Resource Conservation and Recovery Act; REACH - Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals; RQ - Reportable Quantity; SADT - Self-Accelerating Decomposition Temperature; SARA - Superfund Amendments and Reauthorization Act; SDS - Safety Data Sheet; TCSI - Taiwan Chemical Substance Inventory; TSCA - Toxic Substances Control Act (United States); UN - United Nations; UNRTDG - United Nations Recommendations on the Transport of Dangerous Goods; vPvB - Very Persistent and Very Bioaccumulative

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