



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 - www.aqmd.gov

Via Certified Mail and Return Receipt

July 24, 2015

Mr. Douglas Greene
President
Hixson Metal Finishing
829 Production Place
Newport Beach, CA 92663

Subject: Conditional Approval of Rule 1402 Risk Reduction Plan for **Hixson Metal Finishing, Newport Beach** (SCAQMD I.D. No: **11818**)

Dear Mr. Greene:

This letter is in response to Hixson Metal Finishing's (Hixson) Final Risk Reduction Plan (RRP), dated July 1, 2015, and the revised schedule of implementation of the Risk Reduction Measures (RRM) submitted on July 20, 2015, for the facility located at 829 Production Lane, Newport Beach, California (Facility ID# 11818).

BACKGROUND:

On April 3, 2014, SCAQMD staff required Hixson to prepare and submit a RRP within 180 days, due to Hixson's elevated levels of hexavalent chromium [Cr(VI)] that was identified at monitors located on Hixson's property and at two adjacent properties (an apartment to the south and an industrial property to the north). Hixson submitted its first RRP to the SCAQMD on March 2, 2015. On May 8, 2015, the SCAQMD staff rejected Hixson's first RRP and required submittal of a revision by June 8, 2015. Hixson subsequently submitted a second RRP on June 5, 2015. On June 26, 2015, SCAQMD staff rejected Hixson's second RRP due to its failure to demonstrate that the proposed controls will reduce risks below Rule 1402 thresholds. Hixson's third and final Risk Reduction Plan was submitted July 1, 2015. After review of this third RRP, SCAQMD staff requested Hixson to revise the implementation schedule so that the risk reduction measures would be implemented as quickly as feasible. Hixson submitted a revised schedule on July 20, 2015.

Also please note that SCAQMD staff reviewed the proposed emission controls and modeling analysis in the July 1, 2015 RRP. This RRP projects a potential maximum residential cancer risk of 0.8 per million once the RRP is completely implemented. The Health Risk Assessment (HRA) included with the RRP did not include emissions from the onsite soil vapor extraction system. Adding in these emissions would increase the risk by approximately 0.3 per million at the maximally exposed receptor.

Hixson's RRP proposes multiple types of control devices for sources of hexavalent chromium emissions in Buildings 2 and 3. These control devices include a dry scrubber and HEPA/ULPA filters designed to directly pull emissions from hoods above anodizing and plating lines, and wet scrubbers with mesh pads for any fugitive emissions coming from Buildings 2 and 3. Because of significant concerns with potential fugitive emissions, SCAQMD staff conducted a sensitivity analysis to determine what the residual risk would be if up to 5% of the emissions from the plating and anodizing lines were released as fugitive emissions and not controlled through the dry scrubbers and HEPA/ULPA filters, and instead were controlled only through the wet scrubber with a mesh pad. The wet scrubber and mesh pad were conservatively assumed to have only 45% control efficiency. This conservative scenario resulted in a potential maximum residential risk of approximately 15 to 20 per million, still below the Rule 1402 threshold of 25 per million.

FINAL RISK REDUCTION PLAN CONDITIONAL APPROVAL

After careful the review of Hixson's Final RRP by SCAQMD staff, the SCAQMD hereby grants conditional approval of this plan, contingent upon the following:

- 1. Hixson shall submit complete applications for construction of RRM to SCAQMD as soon as possible, but no later than August 17, 2015. Please note that although the information in the Risk Reduction Plan is conceptually complete, it does not include detailed engineering data and calculations. Hixson must submit the detailed information to be submitted by Hixson, along with required applications for construction of new equipment and modification of existing equipment, in order for SCAQMD to expedite its review process. Hixson must use good engineering principles and practices for the design of ventilation systems and air pollution control equipment.**
- 2. Hixson shall submit complete applications for construction of RRM to the City of Newport Beach as soon as possible, but no later than August 17, 2015.**
- 3. Hixson shall submit complete information to SCAQMD for the preparation of any CEQA documents, if required, by August 17, 2015.**
- 4. Hixson shall request expedited permit processing from SCAQMD and Accelerated Plan Review from the City of Newport Beach and shall pay all necessary fees to SCAQMD and the City of Newport Beach for expedited/Accelerated Plan Review.**
- 5. Hixson shall complete construction of all RRM as soon as possible, but in no event later than March 31, 2016, unless an extension is granted in writing by the SCAQMD.**

If you have any questions regarding this RRP conditional approval, please contact me at (909) 396-2662.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mohsen Nazemi', written in a cursive style.

Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance

MN:AD

Attachment

cc: Barry Wallerstein, SCAQMD
Kurt Wiese, SCAQMD
Philip Fine, SCAQMD
Kim Brandt, City of Newport Beach