



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Ebb Tide Residential Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The lead agency proposes to demolish 73 mobile home structures and construct 81-single family condominiums. The lead agency has determined that the construction and operational air quality impacts for the proposed project are less than significant.

SCAQMD staff appreciates that the Draft MND for this project discusses a local facility (Hixson Metal Finishing [Hixson]) that emits hexavalent chromium in the course of its operation.¹ Because of the close proximity of the project to Hixson Metal Finishing, future residents would be exposed to hexavalent chromium, which is a toxic air contaminant. Table 1.1 of the California Air Resources Board Land Use Handbook² recommends avoiding siting new sensitive land uses within 1,000 feet of a chrome plater. As discussed in the Draft MND, Hixson was required to prepare an AB2588 Air Toxics Hot Spot Health Risk Assessment (HRA) and Risk Reduction Plan (RRP) pursuant to SCAQMD Rule 1402. HRAs estimate potential health risks over a lifetime of exposure from air toxics. For Hixson, the HRA and RRP were required in response to elevated levels of hexavalent chromium that were identified at monitors located on and near Hixson's property. Assuming the facility's emissions in 2013 persisted for 30 years, people who live closest to the facility could have a maximum increased risk of 1,502 chances in one million of getting cancer. Cancer risks in this scenario were found to reach more than 200 per million on the proposed project site.

Recently, SCAQMD staff approved Hixson's RRP designed to reduce these cancer risks in the community. This RRP requires that all control measures be in place at the facility by March 2016. The RRP states that after implementation of all control measures, and assuming that they all work perfectly as designed, the residual risk in the community will be about one per million. However, in its approval, SCAQMD staff noted that given the facility's history, there is the potential that a small amount of hexavalent chromium emissions may escape some of the

¹ For the most recent information regarding Hixson Metal Finishing, please visit:

<http://www.aqmd.gov/home/regulations/compliance/toxic-hot-spots-ab-2588/hixson-metal-finishing>

² California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective."

Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

designed controls. Based on a sensitivity analysis, SCAQMD staff concluded that if this happens, the risk could reach between 15 and 20 per million in the community, a level below the requirements of AB2588. However, we note that these levels are higher than SCAQMD's recommended CEQA threshold of 10 per million.

SCAQMD staff recommends that the lead agency include additional evaluation of the potential need for mitigation before certifying this Draft MND. Mitigation measures that should be evaluated for appropriateness include: considering site designs that provide the maximum buffer between occupied residential spaces (including outdoor recreation areas) and emissions from industrial sources such as Hixson, and adding filtration to the ventilation systems of the project to reduce indoor particulate matter levels.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

Ian MacMillan
Planning and Rules Manager

IM:JW:JC
ORC150707-12
Control Number