HIXSON
METAL FINISHING

Supporting Flight Excellence

August 7, 2024

Alberto Jasso
Senior Air Quality Engineer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178

RE: REQUEST FOR REMOVAL OF WASTE TREATMENT PERMENENT TOTAL ENCLOSURE (PTE) FROM RISK REDUCTION PLAN (RRP), DATED JULY 24, 2015, AND APPLICATION NUMBER 577551.

Dear Mr. Jasso,

Thank you for your email of July 18, 2024, allowing Hixson Metal Finishing (HMF or Hixson) the opportunity to provide additional information pertaining to the request to have the PTE requirement removed from the Risk Reduction Plan and permit application number 577551.

Risk Reduction Plan

In 2014, Hixson was contacted by the SCAQMD and informed that an air quality monitor that was part of the MATES IV program located in the area was receiving elevated readings of chromium VI emissions. This started a long process of investigations on the part of both SCAQMD and Hixson to find, control or eliminate all possible emission sources.

Working with SCAQMD staff, Hixson prepared a Risk Reduction plan (RRP) that included several specific measures that Hixson would take to reduce and/or eliminate the emission of chrome VI emissions from the facility. This RRP was approved by the SCAQMD on July 24, 2015.

Starting in 2015 until 2019, Hixson began an $8.5 million improvement and construction project that included the installation of a new anodizing line, the reconfiguration and upgrading of all other processing lines, the installation of four new scrubber systems, the relocation and upgrading of our paint booths, the installation of Permanent Total Enclosures (PTEs) for all production areas (including the Waste Treatment area that includes the Patio Area – Risk Reduction Measure Number 7) as well as numerous improvements in fugitive dust elimination policies and practices.

Once completed, the improvements had reduced recorded emissions substantially and Hixson was deemed to be compliant with all emissions standards. These changes that Hixson made during this process were soon incorporated, near verbatim, into the most recent revisions of Rule 1469.

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Starting in 2023 while going through the process of reviewing the processing line and other permit applications that had not yet been finalized, it was requested by Hixson that the PTE requirements for the Waste Treatment/Patio Area be eliminated. This was due to the fact that the only tank containing a chromate solution (Tank 111 – CRES Black Oxide) had been reformulated and no longer contained any Potassium Bichromate, therefore eliminating all chromates from any production tanks in this area.

The past installation of the PTE serving the Waste Treatment and Patio Area was a requirement from SCAQMD due to tank 111 having Potassium Bichromate in the solution. Since this tank no longer contains this constituent and Rule 1469 does not mandate a PTE for any of the other tanks in this area, Hixson, respectfully requests that the requirements as indicated in the permit application and as per the RRP be eliminated.

We have attached supporting documentation that contains the email and documents sent to Mr. Rene Loof (SCAQMD Permitting Engineer) on April 13, 2023, and a copy of all documentation provided with said email.

Hixson hopes that you will take the above information into consideration for this request. If you have any questions, please feel free to contact me at your convenience.

Sincerely

Bruce Greene
Hixson Metal Finishing
Environmental/Health & Safety Manager
829 Production Place
Newport Beach, CA 92663
(949) 722-3459
bruce.greene@HMFgroup.com

Bruce Greene

From: Alberto Jasso <AJasso@aqmd.gov>
Sent: Thursday, July 18, 2024 5:30 PM
To: Bruce Greene
Cc: Victoria Moaveni; Tracy Tang
Subject: Hixson AB 2588 RRP

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Bruce,

The AB 2588 team is contacting your facility regarding the Risk Reduction Plan (RRP) that was conditionally approved on July 24, 2015. As part of the RRP, a PTE as demonstrated via USEPA Method 204 was required which was ultimately incorporated as a permit condition (Application 577551). This risk reduction measure was triggered by presence of a tank containing hexavalent chromium in the outdoor area where the wastewater treatment area is located. Hixson previously had difficulties demonstrating compliance with Method 204, but they have since reformulated the tank to remove hexavalent chromium.

Since the wastewater PTE requirement is included in the approved RRP, Hixson must submit a formal request to remove this requirement, explaining why this change would not result in an increase in risk for the RRP. Please submit by August 8, 2024.

Feel free to reach out with any questions.

South Coast AQMD
Alberto Jasso
Senior Air Quality Engineer
South Coast Air Quality Management District
(909) 396-3581
ajasso@aqmd.gov

Bruce Greene

From: Bruce Greene
Sent: Thursday, April 13, 2023 12:52 PM
To: Rene Loof
Subject: Waste Treatment and Camium Line
Attachments: Cadmium Plate Line_112015_B.xls; black-magic-ss-sds-2232003.pdf; 111 MAMR111-CRES Black Oxide- Rev B.pdf

Rene,

I think the tank that we are looking at is tank 111 on permit number 577547, the Cadmium Plating Line that is located in the patio area of the waste treatment area.

That tank is the CRES Black Oxide tank that contains a chemical called Black Magic SS. Black Magic SS used to have a small amount of Potassium Bichromate but that chemical has been reformulated and the Potassium Bichromate has been removed (Please see SDS attached).

I do not see any other tanks in that area that would contain any chromates.

Hope this helps.

Thanks

From: Rene Loof <RLoof@aqmd.gov>
Sent: Wednesday, April 5, 2023 12:07 PM
To: Bruce Greene <bruce.greene@hmfgroup.com>
Subject: Greetings

Hi Bruce,
The District has brought me back to work on your applications and I just wanted to let you know that I am available. My number is still the same (909)396-2544 with the same email. I'm getting reacquainted with facility so bear with me. Thanks.

Rene Loof

HMF 011F

HIXSON METAL FINISHING
SOLUTION CONTROL FORM

DEPT. NAME: Waste Treatment
REV: B
LOCATION: Waste Treatment

TYPE: Conversion Coating
EFFECTIVITY DATE: _____

GENERAL DATA		SOLUTION		MAKE-UP		OPERATING RANGE			ANAL.
Tank Number	111		MATERIAL	AMT	UNIT	RANGE	TARGET	UNITS	FREQ
Description	**Black Oxide, CRES**	1	Black Magic SS	375	Lbs	4.5 - 5.5	5.00	ppg	Daily**
Volume (gal)	79	2	Deionized Water	Bal					
Temp Range (° F)	250 - 260	3							
pH Range	N/A	4							
Baume Range	N/A	5							
Carbon Treat *f*	N/A	6							
Gallons / Inch	2.47	7							
		8							
		9	Solution Height Measurement (R&D)	2.00	inch	1.0 - 3.0	2.00	inch	

Specifications:	
1	Technical Data Sheet
2	bps 4084 (temp 250 - 260)
3	mil c 13924
4	
5	
6	

Tank Information:
28"x 28"x 24" with 2" freeboard
** This bath maintained by adding material to maintain boiling point
No Data is recorded
complies with MB 1660

Approved by:
Lab
Production
Quality

SPECIFICATION SOLUTION VARIATIONS

	SPECS	1	2	3	4	5	6	LAB PROCEDURE
MATERIALS								
Black Magic SS		4.5 - 5.5	per spec 1	per spec 1				
Temperature		255 - 265	per spec 1	per spec 1				

ADDITIONS

DATE	AMOUNT	CHEMICAL

Hubbard-Hall

Safety Data Sheet

Better Chemistry. **Better Business**

BLACK-MAGIC SS

1 IDENTIFICATION

Product Code :2232003

Recommended use of the chemical and restrictions on use: Metal finishing

Hubbard-Hall Inc.
563 South Leonard Street
Waterbury, CT 06708
Telephone: 203-756-5521
Fax number: 203-756-9017

Emergency Phone Number
CHEMTREC: 1 (800) 424-9300
International: 1 (703) 527-3887

2 HAZARDS IDENTIFICATION

Signal Word: DANGER

Hazard Category: Corrosive to Metals Hazard Category 1
Acute Toxicity-Oral Hazard Category 4
Skin Corrosion/Irritation Hazard Category 1A
Eye Damage/Irritation Hazard Category 1
Oxidizing Liquids Hazard Category 3

Hazard Statements: May be corrosive to metals.
Harmful if swallowed.
Causes severe skin burns and eye damage.
May intensify fire, oxidizer.

Prevention: Keep only in original container.
Wear protective gloves, chemical protective clothing, eye protective goggles and face shield for face prot
Do not eat, drink or smoke when using this product.
Do not breath dusts or mists.
Wash skin thoroughly after handling.
Keep away from heat.
Keep/Store away from clothing and other combustible material.
Take any precaution to avoid mixing with combustibles.

Response: If inhaled: Remove person to fresh air and keep comfortable for breathing. Call poison center/doctor if yo
If swallowed: Rinse mouth. Do NOT induce vomiting.
If on skin(or hair): Take off immediately all contaminated clothing. Rinse with water/safety shower. Ca
Wash contaminated clothing before reuse.

6 ACCIDENTAL RELEASE MEASURES

Personal Precautions, Protective Equipment, & Emergency Proc

Prevent spilled product from drains, sewers, waterways and soil.

Wear appropriate chemical protection equipment such as gloves, face-shield, goggles and suitable body protection to prevent contamination of skin, eyes and personal clothing.

Methods and Materials for containment & cleaning up:

If trained in accordance 29 CFR 1910.120, leaks should be stopped. Spills should be contained and cleaned immediately. Persons performing clean up work should wear adequate personal protective equipment and clothing. Spills and releases should be reported, if required, to the appropriate local, state and federal regulatory agencies.

7 HANDLING AND STORAGE

Precautions for safe handling:

Use caution when combining with water. DO NOT add water to Caustic. ALWAYS add caustic to water while stirring to minimize heat generation. Do not get in eyes,skin or on clothing. Do not taste or swallow. Do not breath vapor or mist. Use only with adequate ventilation. Wear appropriate personal protective equipment. Transfer and storage systems should be compatible and corrosion resistant. Observe good industrial hygiene practices.

Conditions for safe storage, Inc any incompatibilities:

Keep container tightly closed.

Store in cool dry place.

Store away from incompatible materials. (See section 10).

Do not allow material to freeze.

Store in corrosive resistant container.

8 EXPOSURE CONTROLS / PERSONAL PROTECTION

Name	Std.	TWA-8hrs	STEL - 15 min.
Sodium Hydroxide	ACGIH	2 mg/m3	
*sodium Nitrate	OSHA	15 mg/m3 total dust 5mg/m3 respirable dust	

ACGIH - American Control of Governmental Hygenists
OSHA - Occupational Safety and Health Administration

Ventilation: Use local exhaust to keep personal exposures below the OSHA Permissible Exposure Limit (s) (PEL) or the ACGIH threshold Limit Values (TLV)Time Weight Average (TWA).

Protective Gloves: Rubber gloves

Eye Protection: Wear chemical safety goggles with face shield.

Other Protective Equipment: Wear chemical resistant apron.

9 PHYSICAL AND CHEMICAL PROPERTIES

Appearance: White to off-white granular mixture

Odor: No odor

Odor Threshold: N/A

PH: 12

Melting Point/Freezing Point: approx 900 °F

Initial Boiling Point and Boiling Range:	N/A
Flash Point:	N/A
Evaporation Rate:	N/A
Flammability (solid, gas):	N/A
Upper/Lower flammability or explosive limits:	N/A
Vapor Pressure:	N/A
Vapor Density:	N/A
Relative Density:	N/A
Solubility (ies):	Complete in water
Partition Coefficient; n-octanol/water:	N/A
Auto-ignition Temperature:	N/A
Decomposition Temperature:	N/A
Viscosity:	N/A

10 STABILITY AND REACTIVITY

Reactivity:	Contact with metal may release flammable hydrogen gas.
Chemical Stability:	Stable under normal conditions
Possibility of Hazardous Reactions:	Hazardous polymerization does not occur.
Conditions to Avoid:	Reacts violently with strong acids. This product may react with oxidizing agents. Do not mix with other chemicals. Corrosive to aluminum, tin, zinc, copper and most alloys in which they are present including brass and bronze. Corrosive to steels at elevated temperatures above 40 °C.
Incompatible Materials:	Avoid contact with aluminum, tin, zinc. halogenated solvents, and strong oxidizers and acids.
Hazardous Decomposition Products:	Contact with metal (aluminum, zinc, tin) and sodium tetrahydroborate liberates hydrogen gas.

11 TOXICOLOGICAL INFORMATION

Oral Administration:	Caustic 50% solution: LD50, Rat-300-500 mg/kg
Dermal administration:	Caustic 50% solution-LD50 Rabbit->2 g/kg
Delayed effects:	Severe irritation or burns to skin, eyes and respiratory system
Immediate effects:	Severe irritation or burns to skin, eyes and respiratory system
Cancer Hazard:	Not listed by IARC, NTP, OSHA, ACGIH
Routes of Exposure	Eyes, Skin, Inhalation, Ingestion

12 ECOLOGICAL INFORMATION

Fish, Lepomis macrochirus,	Caustic-99 mg/L, 48 hrs
Bioaccumulation potential:	Unlikely
Water result:	Disperses in water.
Soil/Sediment Result:	Pronounced solubility and mobility

13 DISPOSAL CONSIDERATION

Dispose of in accordance with local, state and federal regulations.

14 TRANSPORT INFORMATION

UN Number:	3262
UN Proper Shipping Name:	CORROSIVE SOLIDS, BASIC, INORGANIC, N.O.S.(SODIUM HYDROXIDE),
Transport Hazard Class (es):	8
Packing Group:	II
ERG:	154

15 REGULATORY INFORMATION

HMIS: Health: 3 Flammability: 0 Reactivity: 2

Cercla	2000 lb RQ (Caustic 50%)
Sara Hazard Classification	SARA 302 - Extremely Hazardous Substances; None present
Sara Hazard Classification	SARA Hazard Categories: Immediate Hazard:Yes Delayed Hazard:Yes Fire Hazard-No Pressure Hazard-No Reactivity Hazard-yes

16 OTHER INFORMATION

No **RoHS** or **REACH SVHC** are contained in this product.

Disclaimer: The information is based on our knowledge to date but does not constitute an assurance of product properties and does not imply a legal contractual relationship.

Date Prepared: 8/8/14

Cadmium Plate Line (F32230) Tank Schedule

Tank Number	Tank	Main Process	Sub - Process	Quantity	Constituents	Max Amount	Measurment	Current Permit	New Permit	Size (W)	Size (L)	Size (D)	FreeBoard	Volume (Gal)	Surface Area (sq ft)	Heating Requirements	Max Temp	Incoming Water	Discharge Plumbing	Tank Covering	% Time Covered	Scrubber	Scrubber CFM	Tank pH (approximate)	Agitation Requirements	Agitation (CFM)	Agitation (GPM)	Rectifier
23	Hot DI Water	Rinse		1	DI Water	100.00	%/w	Not Required	Not Required	21.75	34	30	5	80.03	5.14	12KW	212	DI Water						5.5 - 8.0	AIR	20		
42	Rodine	Preprocess	Activation	1	Muriatic Acid	81.65	%/w	Cad Plate	Cadmium Plating (F32230)	23	23	30	3	61.83	3.67		Ambient							N/A				
					Rodine 213	0.18	%/w																					
43	Passivate Type II	process	Passivation	1	Nitric Acid Concentrate	35.44	%/w	Cad Plate	Cadmium Plating (F32230)	48	24	36	3	258.36	12.56	8KW	155					Chromic	1300	N/A	PUMP		20	
					Sodium Dichromate	3.75	%/w																					
					Sodium Dichromate	3.94	%/w																					
44	Passivate Type VII	process	Passivate	1	Nitric acid	43.01	%/w		Cadmium Plating (F32230)	24	30	30	3	84.15	5.00	8KW	140								PUMP		11	
47B	Cadmium Strip	preprocess	strip	1	Ammonium nitrate	16.88	%/w	Cad Plate	Cadmium Plating (F32230)	24	30	28	3	77.92	5.00		Ambient								PUMP		11	
					Cadmium metal	3.75	%/w																					
48	Nitric Acid 50%	process	Passivate	1	Nitric acid	85.44	%/w	New	Cadmium Plating (F32230)	24	36	30	3	52.85	3.14	4KW	90								PUMP		11	
52	Cadmium Plate	Process	Cad Plate	1	Cadmium Oxide	4.69	%/w	Cad Plate	Cadmium Plating (F32230)	60	24	36	4	199.47	10.00		Ambient					Cyanide	1000	12.0 Min	PUMP		11	15V/200A
					Sodium Cyanide	20.63	%/w																					
					Caustic Soda	3.75	%/w																					
					Sodium Carbonate	9.38	%/w																					
54	Douglas LHE Cadmium	Process	Cad Plate	1	Cadmium Oxide	4.50	%/w	Cad Plate	Cadmium Plating (F32230)	60	24	36	4	199.47	10.00	4KW	90					Cyanide	1000	12.0 Min	PUMP		11	15V/200A
					Sodium Cyanide	15.00	%/w																					
					Caustic Soda	3.00	%/w																					
					Sodium Carbonate	7.50	%/w																					
55	Manganese Phosphate	Process	phosphate	1	Gardobond G 4040	23.38	%/w	Cad Plate	Cadmium Plating (F32230)	24	24	30	3	52.85	3.14	8KW	200							N/A				
					Iron (II)	1.13	%/w																					
56	Cadmium Plate	Process	Cad Plate	1	Cadmium Oxide	4.23	%/w	Cad Plate	Cadmium Plating (F32230)	60	24	36	4	199.47	10.00		Ambient					Cyanide	1000	12.0 Min	PUMP		11	15V/200A
					Sodium Cyanide	20.63	%/w																					
					Caustic Soda	3.75	%/w																					
					Sodium Carbonate	9.38	%/w																					
					Isobrite 541	1.47	%/w																					
57	Cad Chromate - Gold	postprocess	Chromic Conversion	1	Iridate 80	3.79	%/w	Cad Plate	Cadmium Plating (F32230)	48	24	36	3	164.56	8.00	8KW	90					Chromic	800	1.0 - 1.5	PUMP		11	
58	Cad Chromate - Clear	postprocess	Chromic Conversion	1	Macro Brite C9	15.00	%/w	Cad Plate	Cadmium Plating (F32230)	24	24	36	3	82.28	4.00	8WK	90					Chromic	400	0.4 - 0.8	PUMP		11	
79	Dull Cadmium Plate	Process	Cad Plate	1	Cadmium Oxide	4.69	%/w	Cad Plate	Cadmium Plating (F32230)	60	24	36	4	199.47	10.00	8KW	90					Cyanide	1000	12.0 Min	PUMP		11	15V/200A
					Sodium Cyanide	20.63	%/w																					
					Caustic Soda	3.75	%/w																					
					Sodium Carbonate	9.38	%/w																					
82	Cadmium Plate	Process	Cad Plate	1	Cadmium Oxide	4.69	%/w	Cad Plate	Cadmium Plating (F32230)	106	36	60	4	925.03	26.50	16KW	90					Cyanide	2700	12.0 Min	PUMP		50	15V/500A
					Sodium Cyanide	20.63	%/w																					
					Caustic Soda	3.75	%/w																					
					Sodium Carbonate	9.38	%/w																					
					Isobrite 541	1.50	%/w																					
110	Descale	cleaner		1	Cee Bee J88A	37.50	%/w	Cad Plate	Cadmium Plating (F32230)	24	24	28	3	62.33	4.00	12KW	220								PUMP		11	
					Potassium Permanganate	7.50	%/w																					
111	CRES Black Oxide	process	black oxide	1	Black magic SS	82.50	%/w	Cad Plate	Cadmium Plating (F32230)	24	24	18	3	37.40	4.00	12KW	260											
113	Alkaline Nickel Strip	preprocess	strip	1	Niposit 428 D	9.38	%/w	Nickel		24	36	36	3	123.42	6.00	12KW	180								PUMP		11	
					Niposit 428 L	15.75	%/w																					
116	Zinc Phosphate	Process	phosphate	1	Cryscoat MP	6.39	%/w	Cad Plate	Cadmium Plating (F32230)	24	24	30	3	67.32	4.00	6KW	190							2.4 - 2.8				
118	Chromic Rinse	postprocess	Chromic Conversion	1	Chromic Acid	0.75	%/w	Cad Plate	Cadmium Plating (F32230)	24	30	36	3	102.85	5.00	6KW	190					Chromic	500	2.0 - 3.0	PUMP		11	
119A	Cadmium Chromate -OD	postprocess	Chromic Conversion	1	Kenvert 11	10.44	%/w	Cad Plate	Cadmium Plating (F32230)	24	24	36	3	82.28	4.00	4KW	90					Chromic	400	0.7 - 1.8	AIR	20		
121	Steel Black Oxide	process	black oxide	1	Oxi Black	95.00	%/w	Cad Plate	Cadmium Plating (F32230)	22		16	3	21.38	2.64	12KW	300											
129	Muriatic Acid	Preprocess	Activation	1	Muriatic Acid	82.25	%/w	Cad Plate, Tin Plate	Cadmium Plating (F32230)	48	24	30	3	134.64	8.00		Ambient							N/A	PUMP		11	
160	Sodium Dichromate	postprocess	Chromic Conversion	1	Sodium Dichromate	7.50	%/w	Cad Plate	Cadmium Plating (F32230)	24	30	36	3	64.59	3.14	4KW	160					Chromic	350	4.0 - 6.0	PUMP		11	
210	Cadmium Strip	preprocess	strip	1	Hydrochloric acid	48.31	%/w	Cad Plate	Cadmium Plating (F32230)	21	33	28	3	74.99	4.81		Ambient								PUMP		11	
Aux 7*	Passivation for Stelco	Process	Passivation	1	Nitric acid	76.88	%/w	New	Cadmium Plating (F32230)	12	24	12	3			4KW	140								PUMP		11	
					Sodium Dichromate	2.81	%/w																					
Aux 9*	Passivation for Aviation	Process	Passivation	1	Nitric acid	30.94	%/w	New	Cadmium Plating (F32230)	12	24	12	3			4KW	140								PUMP		11	
					Sodium Dichromate	3.75	%/w																					
A14	Acid Rinse	Rinse		1	Tap Water	100.00	%/w	Not Required	Not Required	48	24	30	3	134.64	8.00		Ambient	Tap Water	Feed to Waste Treatment - Acid						AIR	30		
A16	Acid Rinse	Rinse		1	Tap Water	100.00	%/w	Not Required	Not Required	23	23	30	3	61.83	3.67		Ambient	Tap Water	Feed to Waste Treatment - Acid						AIR	20		
A18	Acid Rinse	Rinse		1	Tap Water	100.00	%/w	Not Required	Not Required	22.75	36	30	3	95.72	5.69		Ambient	Tap Water	Feed to Waste Treatment - Acid						AIR	20		
A19	Acid Rinse	Rinse		1	Tap Water	100.00	%/w	Not Required	Not Required	60	24	30	3	168.30	10.00		Ambient	Tap Water	Feed to Waste Treatment - Acid						AIR	30		
A20	Acid Rinse	Rinse		1	Tap Water	100.00	%/w	Not Required	Not Required	33	21.75	30	3	83.89	4.98		Ambient	Tap Water	Feed to Waste Treatment - Acid						AIR	20		
A21	Acid Rinse	Rinse		1	Tap Water	100.00	%/w	Not Required	Not Required	33	21.75	30	3	83.89	4.98		Ambient	Tap Water	Feed to Waste Treatment - Acid						AIR	20		
A22	Acid Rinse	Rinse		1	Tap Water	100.00	%/w	Not Required	Not Required	24	24	30	3	67.32	4.00		Ambient	Tap Water	Feed to Waste Treatment - Acid						AIR	20		
A23	Acid Rinse	Rinse		1	Tap Water	100.00	%/w	Not Required	Not Required	24	24	30	3	67.32	4.00		Ambient	Tap Water	Feed to Waste Treatment - Acid						AIR	20		

A100	Tap Water Rinse	rinse		1	Tap Water	100.00	%/w	Not Required	Not Required	24	36	36	3	123.42	6.00		Ambient	Tap Water	Feed to Waste Treatment - Acid						AIR	30		
A101	Tap Water Rinse	rinse		1	Tap Water	100.00	%/w	Not Required	Not Required	24	36	36	3	123.42	6.00		Ambient	Tap Water	Feed to Waste Treatment - Acid						AIR	30		
WT3	Cadmium Treat	W/T	Cad Treat	1				New	Cadmium Plating (F32230)	36	36	30	3	151.47	9.00	Chilled	N/A								Mechanical Mixer			