



South Coast Air Quality Management District

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Hand Delivered

June 26, 2015

Mr. Douglas Greene
Hixson Metal Finishing
829 Production Place
Newport Beach, CA 92663-2809

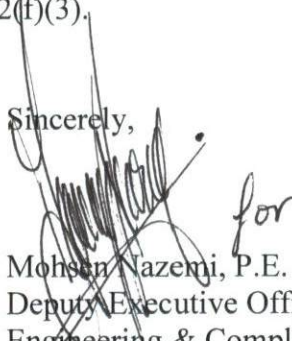
SCAQMD Staff Rejection of Hixson Metal Finishing's (Facility ID 11818) Second Draft Rule 1402 Risk Reduction Plan

Dear Mr. Greene:

On April 3, 2014, SCAQMD staff required Hixson Metal Finishing (Hixson) to prepare a Risk Reduction Plan (RRP) within 180 days. Hixson requested and was granted an extension to submit the RRP by December 16, 2014. Hixson missed this deadline and was issued a Notice of Violation (P 53088) for failing to submit the RRP on time. Subsequently, Hixson submitted its first draft RRP on March 2, 2015. On May 8, 2015 SCAQMD staff rejected Hixson Metal Finishing's (Hixson) first Risk Reduction Plan (RRP) and required a second revision by June 8, 2015. Hixson subsequently provided a second RRP on June 5, 2015. **This second draft RRP is rejected due to its failure to demonstrate that the proposed controls will reduce risks below Rule 1402 thresholds.** Additional clarifying information regarding the reasons for this rejection are attached to this letter.

Pursuant to SCAQMD Rules 1402(g)(1) and 216, you have 30 days to appeal this rejection of your Risk Reduction Plan to the District's Hearing Board. Please be advised that continued operation of your facility without an approved Risk Reduction Plan will be considered an on-going, daily violation of SCAQMD Rule 1402(f)(2) and 1402(f)(3).

Sincerely,


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

cc: Barry Wallerstein, SCAQMD
Kurt Wiese, SCAQMD
Phillip Fine, SCAQMD

ATTACHMENT

Deficiencies in Hixson's RRP

- Hixson's proposed RRP fails to identify an appropriate particulate control technology (i.e. HEPA or ULPA filtration system) for control of tanks containing Cr VI in Building 3 and the Waste Water Treatment area located between Buildings No. 2 and 3.
- Hixson's proposed RRP fails to identify appropriate particulate control technology (i.e. down draft tables connected to a HEPA filtration system) for control of Cr VI emissions from the de-masking operations located in Building No. 4.
- Hixson's proposed RRP fails to identify alternative scenarios for location and control of fugitive emissions from the handling, storage and disposal of "supersacks" in the event the "supersacks" are stored outside Building No. 4.
- Hixson's proposed RRP fails to address fugitive emissions from transferring and depositing filter cake generated from the waste water treatment process in the large storage bin, located between Buildings No. 2 and 3, that is used to collect and store the dried filter cake.

Incorrect Baseline Emission Inventory in RRP

The second draft RRP uses an incorrect baseline emissions inventory when calculating the potential effectiveness of the proposed risk reduction measures. The RRP uses monitoring data from 2014 to determine that the baseline emissions from Hixson have dropped approximately 86% since the 2013 baseline used for the approved Health Risk Assessment. This is an incorrect assumption because it takes credit for long periods of curtailment required in the May 14, 2014 Hearing Board Order for Abatement. As this activity should not be considered a normal, enforceable part of Hixson's operations in the future, it should not be considered in the baseline emissions. If there are enforceable measures that are part of Hixson's routine operations, they can be considered when calculating reductions from the 2013 baseline year for purposes of the RRP.