

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ATTACHMENT 1: MITIGATION MONITORING AND REPORTING PLAN TO THE
FINAL MITIGATED NEGATIVE DECLARATION FOR
HIXSON METAL FINISHING RISK REDUCTION PROJECT**

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1.0 PROJECT DESCRIPTION

1.1 INTRODUCTION

Hixson Metal Finishing (Hixson or Facility) is proposing a Risk Reduction Project (proposed project) at its Newport Beach Facility, which would consist of on-site tank, spray booth, and oven relocations; installation of additional air pollution control systems; construction of permanent total enclosures; installation of covers on wastewater treatment tanks, preparation and implementation of an improved housekeeping and dust minimization plan, and improvements to the Facility's electrical system. The Facility currently conducts anodizing, testing, plating, and coating for aerospace and defense industries. The overall focus of the proposed project is to reduce the Facility's emissions, primarily of hexavalent chromium (CrVI) in order to comply with an approved Risk Reduction Plan that was required under South Coast Air Quality Management District (SCAQMD) Rule 1402. Since the SCAQMD has primary approval authority over the proposed project, SCAQMD is the appropriate lead agency under CEQA.

1.2 BACKGROUND AND HISTORY OF HIXSON OPERATIONS

1.2.1 General Operations

Hixson has operated in Newport Beach, California since 1958 and is a metal finishing facility that conducts anodizing, testing, plating, coating, and painting operations on various parts for use in the aerospace and defense industries. The Facility is located at 817-861 Production Place, Newport Beach, CA 92663. Hixson operates various types of equipment that are subject to the SCAQMD rules and regulations and permit requirements.

Some of the potential on-site sources of emissions include the chrome anodizing line, chemfilm line, nickel and cadmium plating, curing and drying ovens, paint spray booths, abrasive blasting equipment, wastewater treatment, and miscellaneous natural gas combustion sources. In addition, equipment such as tanks, racks, and drums, and operations such as packaging, product handling and transfer, scuffing/sanding, demasking, and maintenance and cleaning activities contribute substantial fugitive emissions. The primary air quality concern associated with Hixson's operations is CrVI and cadmium emissions.

1.2.2 Air Quality Monitoring

As a result of a basin-wide air toxics monitoring program and study conducted by the SCAQMD (Multiple Air Toxics Exposure Study or MATES III), higher than average levels of CrVI were detected in the general area surrounding Hixson's facility. The SCAQMD installed an ambient monitoring station near Hixson and began monitoring for CrVI. In late 2010 and early 2011, SCAQMD staff noted an increase in CrVI levels so Proposition 65 notices were prepared to notify the public of high CrVI emissions and the health risks associated with those emissions. A second ambient monitoring station was installed to better assess CrVI emission levels and the SCAQMD requested that Hixson implement additional air pollution control strategies to better control emissions.

Despite implementation of control measures, the CrVI detected at the off-site ambient air quality monitors continued to stay at elevated levels and began increasing in late 2013 and early 2014. The SCAQMD staff performed extensive facility inspections, performed emission source tests, and installed additional ambient monitoring stations inside the Hixson facility to identify the sources of CrVI emissions. The SCAQMD required Hixson to prepare and submit a Health Risk Assessment (HRA) and Risk Reduction Plan (RRP) in April 2014. In addition, an Order of Abatement was issued in April 2014 that requires Hixson to implement additional air pollution control systems and requires Hixson to cease operating their tanks containing chromium solutions whenever the off-site seven day average CrVI concentration exceeded specified levels. The monitored levels of CrVI began dropping immediately with implementation of the measures agreed to in the Order of Abatement.

Hixson submitted a HRA that was revised based on SCAQMD comments and that was subsequently approved by the SCAQMD on May 8, 2015. The Hixson HRA used 2013 emissions levels to estimate cancer risks and was adjusted to account for the new OEHHA risk factors adopted in March 2015. Assuming that emissions from Hixson in 2013 persisted for a lifetime, the maximum residential cancer risk was found to be up to 1,501 per million at the residences adjacent to Hixson and 88 per million at businesses adjacent to Hixson. The non-cancer risk levels were all below significance threshold levels. These health risks were calculated using computer models in addition to the data collected from the two ambient air quality monitors adjacent to Hixson. Since mid-2014, the monitors have shown a substantial decrease in detected levels of CrVI, translating to an approximate maximum residential risk of 350 per million if these levels persisted for a lifetime. Since the HRA results were above notification thresholds established in SCAQMD Rule 1402 (10 per million), Hixson was required to notify the surrounding community about the health risk caused by CrVI emissions. A community meeting was held at Hoag Hospital on June 17, 2015 to inform the community of the results of the HRA and of various actions taken by SCAQMD and Hixson to address these risks. SCAQMD Rule 1402 requires health risks to be reduced below 25 per million as soon as possible.

In addition to the HRA, Hixson prepared a RRP which was conditionally approved by the SCAQMD on July 24, 2015. The RRP requires that Hixson begin implementing control measures as soon as possible and have all control measures in place by the end of March 2016. Hixson submitted SCAQMD permit applications for the stationary source modifications to the Facility that are necessary to implement the RRP. This document analyzes the potential impacts of the modifications.

1.3 AGENCY AUTHORITY

Pursuant to CEQA Guidelines §15070, the SCAQMD prepared a Draft Mitigated Negative Declaration (MND) and distributed a Notice of Intent to adopt the Draft MND (CEQA Guidelines §15072) to responsible public agencies and interested parties for review and comment. The Draft MND was distributed for a 30-day public review and comment period beginning on November 4, 2015, and ending on December 4, 2015. Two comment letters and two comment emails were received from the public relative to the Draft MND. After the close of the public comment period, a Final MND was prepared for certification by the SCAQMD's Executive Officer.

Potentially significant adverse impacts to aesthetics, air quality, biological resources, and noise were identified as a result of the proposed project. All potentially significant adverse impacts, however, can be mitigated to less than significant levels.

Pursuant to CEQA Guidelines §15075(b) the Notice of Determination prepared for a MND project that has identified potentially significant effects that would be mitigated to a point where no significant effects would occur must include a statement indicating whether mitigation measures were made a condition of the approval of the project. Further, when changes or alterations have been required or incorporated into a project that mitigate or avoid the significant effects, the public agency is required to adopt a Mitigation Monitoring and Reporting Plan (CEQA Guidelines § 15097) for the changes made, in order to ensure compliance during project implementation.

1.4 MITIGATION MONITORING AND REPORTING PLAN

When a public agency adopts a mitigated negative declaration in conjunction with approving a project, the lead agency shall adopt a program for monitoring or reporting on the measures it has imposed to mitigate or avoid significant adverse environmental effects. PRC §21081.6 states in part:

When making the findings required by subdivision (a) of Section 21081 or when adopting a negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the public agency shall adopt a reporting or monitoring program for the changes to the project that it has adopted or made a condition of approval 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 an agency having jurisdiction by law over natural resources affected by this project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.

Pursuant to the requirement of PRC §21081.6, the SCAQMD must establish a plan to monitor project compliance with those mitigation measures adopted as conditions of approval for Hixson Metal Finishing Risk Reduction Project. The following subsections identify the specific mitigation measures identified in the MND and the public agency responsible for monitoring implementation of each mitigation measure.

Since all significant adverse effects can be mitigated to less than significant levels as identified in the Final MND and the Mitigation Monitoring and Reporting Plan, a Statement of Findings and a Statement of Overriding Considerations are not required for this project.

2.0 SIGNIFICANT ADVERSE IMPACTS WHICH CAN BE REDUCED BELOW A SIGNIFICANT LEVEL

The Final MND identified four potentially significant adverse impacts that can be reduced to a level of insignificance: 1) potentially significant aesthetic impacts on the existing visual character of the Hixson site due to installation of stacks/vents on the top of the building, 2) potentially

significant air quality impacts during construction from unmitigated fugitive CrVI, 3) potentially significant biological resources impacts on migratory birds due to the removal of ornamental trees, and 4) potentially significant noise impacts during both construction and operation on residents living adjacent to Hixson.

2.1 AESTHETIC IMPACTS AND MITIGATION MEASURES

The installation of air pollution control equipment would result in the installation of additional structures and stacks/vents on the top of the Hixson Facility. While this equipment is generally compatible with the industrial nature of the Facility, the equipment would be visible from the apartment buildings immediately south of the Hixson Facility. The proposed project will add additional industrial equipment to the roofs of Building 2, 3, and 4. Compliance with the Newport Beach Municipal Code Section 20.30.020, requires that all new roof-mounted equipment be screened from public view and adjacent residential districts. The existing wooden fence-like screen on the roof of Building 3 serves two functions – aesthetic screening and sound dampening (see discussion under environmental topic "Noise"). The maintenance of the wooden fence-like screen (i.e., painting and repair/replacement of wood fencing) is necessary to maintain the visual quality of the view from the adjacent apartment. Additionally, similar screens on Buildings 2 and 4 are warranted to provide comparable screening of the proposed equipment to be located on the roofs of Buildings 2 and 4. The City of Newport Beach has requested specific language for this mitigation measure, which is set forth below. Therefore, potentially significant visual impacts are expected from the proposed project and mitigation is necessary. The mitigation is described below.

AE-1 Buildings 2, 3, and 4 shall provide a solid, sound-attenuating screen wall at a minimum height necessary to obscure roof-mounted mechanical equipment from view of the adjacent second-story apartments, as well as provide appropriate noise attenuation. The screen wall shall be textured and painted to be compatible with the architectural style, materials, and color of the building upon which the equipment is located and will be subject to the review and approval of the City of Newport Beach Community Development Department. See also Mitigation Measure N-7.

Implementation of mitigation measure AE-1 is expected to reduce the potentially significant visual impacts to less than significant.

2.2 AESTHETICS MITIGATION MONITORING AND REPORTING

Implementing Party: The SCAQMD finds that aesthetics mitigation measure AE-1 will be implemented by Hixson.

Monitoring Agency: The SCAQMD has made these mitigation measures fully enforceable through a legally binding instrument, Attachment 2 for the Hixson Metal Finishing Risk Reduction Project – Declaration of Certification, signed by Hixson’s President and the SCAQMD’s Executive Officer. The City of Newport Beach also has review and approval authority of the screening walls. The SCAQMD through its discretionary authority to issue and enforce permits for the proposed project will ensure compliance with these mitigation measures. Mitigation monitoring and

reporting will be accomplished as follows:

MMAE-1: DOCUMENT SCREENING WALL INSTALLATION

Hixson Metal Finishing Facility shall document and photograph the construction and completion of the screening walls installed on the roofs where mechanical equipment is installed as part of the proposed project (i.e., Buildings 2, 3, and 4). The screening walls must follow specifications outlined in AE-1. The SCAQMD reserves the right to monitor the condition of the screening walls once completed. Documentation must be kept on file and available for SCAQMD review. During construction and operation of the proposed project, Hixson shall keep records that demonstrate the steps taken to assure compliance with this mitigation measure as specified in Table 1.

2.3 AIR QUALITY IMPACTS AND MITIGATION MEASURES

The Facility operations generate chromium emissions that may settle in construction areas. Exposure to chromium emissions has long-term health risk. During the diverse activities that will occur during construction, these areas may be disturbed and there may be fugitive dust emissions that contain CrVI. It is not technically possible to quantitatively determine the exact level of CrVI emissions from this activity due to an uncertain amount of CrVI present on work surfaces, uncertain amounts of disturbance during construction activities, and very low levels of exposure that can cause health impacts coupled with high levels of uncertainty in traditional construction fugitive dust calculations. Because of these uncertainties, and because fugitive CrVI emissions have long-term health risks, unmitigated fugitive CrVI emissions generated by construction activities have the potential to generate potentially significant adverse health risks and mitigation measures are required to reduce this potentially significant impact. The mitigation is described below.

- AQ-1 All onsite personnel, including employees and any others working on-site during project construction, must adhere to all provisions within the attached Dust Minimization Plan (See Appendix A).

The Dust Minimization Plan requires temporary total enclosures, which are expected to be constructed of polyvinyl chloride (PVC) piping draped with covered sheeting. Construction of the temporary total enclosures is expected to be accomplished using hand tools and is not expected to require diesel-powered construction equipment. Therefore, no construction-related emissions are expected. Additional Dust Minimization Plan components involve the use of damp or wet wiping or mopping, which is not expected to generate emissions, and the use of a HEPA vacuum to remove dust from flat surfaces. The HEPA vacuum is expected to reduce the fugitive emissions from flat surfaces. Implementation of mitigation measure AQ-1 is expected to reduce fugitive TAC emissions during construction of the proposed project to less than significant. Furthermore, the Dust Minimization Plan includes measures which will reduce fugitive TAC emissions during Hixson's operation.

2.4 AIR QUALITY MITIGATION MONITORING AND REPORTING

Implementing Party: The SCAQMD finds that air quality mitigation measure AQ-1 will be

implemented by Hixson.

Monitoring Agency: The SCAQMD has made these mitigation measures fully enforceable through a legally binding instrument, Attachment 2 for the Hixson Metal Finishing Risk Reduction Project – Declaration of Certification, signed by Hixson’s President and the SCAQMD’s Executive Officer. The SCAQMD through its discretionary authority to issue and enforce permits for the proposed project will ensure compliance with these mitigation measures. Mitigation monitoring and reporting will be accomplished as follows:

MMAQ-1: IMPLEMENT DUST MINIMIZATION MONITORING PLAN

To ensure compliance with mitigation measure AQ-1, the SCAQMD reserves the right to monitor the construction of the proposed project. This may include both planned and unplanned inspections of the site during construction. The SCAQMD will also review data from the existing ambient air monitors. The Facility will follow guidelines established in the Dust Minimization Plan. During construction and operation of the proposed project, Hixson shall keep records that demonstrate the steps taken to assure compliance with this mitigation measure as specified in Table 1.

2.5 BIOLOGICAL RESOURCES IMPACTS AND MITIGATION MEASURES

The proposed project would be located in a fully developed area, and within the boundaries of an existing industrial facility. Hixson has been fully developed and is essentially void of vegetation with the exception of some landscape vegetation on the northern boundary of the property. All native habitats have long since been removed from the site. The proposed project does not include the acquisition of additional land for use by the Facility or expansion outside of the Facility’s current boundaries, which further eliminates the potential for biological resource impacts. The proposed project would result in the removal of approximately eight ornamental trees from the Hixson property to provide access for the new electrical system. The removal of the ornamental trees is not expected to result in significant biological impacts as the trees that will be removed are non-native (including queen palms) and will be replaced with drought tolerant landscaping. Further, removal of the ornamental trees would not conflict with the provision of a Habitat Conservation Plan or other similar plan.

However, the removal of the ornamental trees would have the potential to impact migratory bird species that could be nesting in trees at the time of tree removal. Therefore, compliance with the Migratory Bird Treaty Act (MBTA) is required and mitigation measure BIO-1 has been imposed.

BIO-1 Tree removal activities shall occur outside of the bird nesting season (February 1st to August 31st). If it is determined necessary for tree removal activities to occur between February 1st and August 31st, a preconstruction nesting bird survey shall be conducted by a qualified biologist within seven days prior to any tree removal activities. Any active nests identified shall have a buffer area established within a 100-foot radius (200-foot for birds of prey) of one active nest. Disturbance shall not occur within the buffer area until the qualified biologist determines that the young have fledged. Demolition and construction activity may only occur within the buffer area at the discretion of the qualified biologist.

Implementation of BIO-1 is expected to reduce the potential biological resources impacts of the proposed project to less than significant.

2.6 BIOLOGICAL RESOURCES MITIGATION MONITORING AND REPORTING

Implementing Party: The SCAQMD finds that biological resource mitigation measure BIO-1 will be implemented by Hixson.

Monitoring Agency: The SCAQMD has made these mitigation measures fully enforceable through a legally binding instrument, Attachment 2 for the Hixson Metal Finishing Risk Reduction Project – Declaration of Certification, signed by Hixson’s President and the SCAQMD’s Executive Officer. The SCAQMD through its discretionary authority to issue and enforce permits for the proposed project will ensure compliance with these mitigation measures. Mitigation monitoring and reporting will be accomplished as follows:

MMBIO-1: AVOIDING DISPLACEMENT OF MIGRATORY BIRDS

To ensure compliance with mitigation measure BIO-1, the SCAQMD reserves the right to monitor the construction of the proposed project. This may include both planned and unplanned inspections of the site during construction. The Facility will follow guidelines established in BIO-1. Documentation (e.g., result of preconstruction survey, if applicable) must be kept on file and available for SCAQMD review. During construction and for two years following construction completion of the proposed project, Hixson shall keep records that demonstrate the steps taken to assure compliance with this mitigation measure as specified in Table 1.

2.7 NOISE IMPACTS AND MITIGATION MEASURES

The construction noise levels are estimated are considered to be potentially significant during peak construction activities and mitigation is required.

Once construction of the proposed project is complete, operation of the new air pollution control equipment would commence including scrubbers and ULPA/HEPA filters. The air pollution control equipment will be located along the southern portion of the Hixson buildings and about 50 feet from the closest residential receptor. Equipment that would generate noise and that would be located on the roof at Hixson is described as follows. A HEPA Filtration System will be placed on the top of Building 1. ULPA Filtration/Dry Gas Scrubbers will be placed on Buildings 2 and 3. An ULPA Filtration System will be placed on Building 4. An acid scrubber would be placed on Building 1. The unmitigated noise increase would be considered potentially significant as it would raise existing noise levels by more than 1 dBA at the adjacent residential receptors.

Noise impacts associated with construction and operational activities are potentially significant for noise for residences located adjacent to Hixson. The following construction mitigation measures will be imposed.

- N-1 During construction, the contractor shall comply with Newport Beach Noise Ordinance (10.28.040) which prohibits construction activities that generate noise

on any weekday except between the hours of 7:00 a.m. and 6:30 p.m., and on any Saturday except between the hours of 8:00 a.m. and 6:00 p.m. Construction activities are prohibited on Sundays and federal holidays.

- N-2 During construction activities, all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained noise mufflers, consistent with manufacturer's standards.
- N-3 Equipment shall be staged in areas that will create the greatest distance between construction-related noise sources and the residential receptors closest to the construction activities during project construction.
- N-4 Construction-related trucks traveling to and from the proposed project sites shall be restricted to the same hours specified for the operation of construction equipment. To the extent feasible, haul routes shall be designed to avoid sensitive land uses and residential areas.
- N-5 Temporary sound blankets (fences typically composed of polyvinyl-chloride-coated outer shells with absorbent inner insulation) shall be placed along the boundary of the proposed project sites facing the nearest noise-sensitive receptors during construction activities.
- N-6 Prior to initiation of construction activities, the construction contractor shall notify residences within 500 feet of the construction areas of the construction schedule. A contact telephone number of the Owner's Authorized Representative shall be conspicuously posted along construction site fences and provided in the notification of the construction schedule to nearby residents.

Mitigation measures N-1 through N-6 are expected to reduce construction noise impacts. Construction that generates noise would avoid the more sensitive evening and nighttime hours, are short-term, and will be eliminated following the completion of the construction phase. Therefore, construction noise impacts are considered to be less than significant after mitigation.

Operational noise levels were also determined to be potentially significant because additional noise generating equipment would be located within 50 feet of residential areas. A six-foot wooden fence-like screen is present along the southern boundary on the roof of the Hixson Building No. 3 and also functions as a noise barrier. The noise attenuation associated with the wooden screen-like fence is expected to be about 18 dBA (FHWA, 2011). Therefore, the following mitigation measure shall be implemented:

- N-7 Noise barriers shall be placed between the air pollution control equipment and the apartment buildings to the south of the Hixson Facility. The noise barrier shall be sufficient to reduce noise levels by a minimum of 18 dBA as identified by Table 3 of the Federal Highway Administration Noise Barrier Design Handbook (FHWA, 2011). The noise barriers shall be maintained to assure that their effectiveness does not decrease with time. The screen wall shall be textured and painted to be

compatible with the architectural style, materials, and color of the building upon which the equipment is located and will be subject to the review and approval of the City of Newport Beach Community Development Department.

With the installation of noise barriers, the noise impacts would be mitigated to less than 1 dBA increase with the installation of a noise barrier and would be considered less than significant.

2.8 NOISE MITIGATION MONITORING AND REPORTING

Implementing Party: The SCAQMD finds that noise mitigation measures N-1 through N-7 will be implemented by Hixson.

Monitoring Agency: The SCAQMD has made these mitigation measures fully enforceable through a legally binding instrument, Attachment 2 for the Hixson Metal Finishing Risk Reduction Project – Declaration of Certification, signed by Hixson’s President and the SCAQMD’s Executive Officer. The City of Newport Beach has review and approval authority over noise barriers. The SCAQMD through its discretionary authority to issue and enforce permits for the proposed project will ensure compliance with these mitigation measures. Mitigation monitoring and reporting will be accomplished as follows and as specified in Table 1:

MMN-1: ADHERE TO CONSTRUCTION OPERATING HOURS

Hixson Metal Facility and Contractors shall only engage in construction, maintenance or repair work on any weekday between the hours of 7:00 a.m. and 6:30 p.m., and on any Saturday between the hours of 8:00 a.m. and 6:00 p.m. Construction activities are prohibited on Sundays and federal holidays, unless a permit has been obtained beforehand. Documentation must be kept on file and available for SCAQMD review. During construction and for two years following construction completion of the proposed project, Hixson shall keep records that demonstrate the steps taken to assure compliance with this mitigation measure.

MMN-2 MAINTAIN EQUIPMENT AS SPECIFIED BY MANUFACTURER

For all construction equipment employed for the proposed project, Hixson shall maintain equipment including mufflers as specified by the equipment manufacturer. Documentation must be kept on file and available for SCAQMD review. During construction and for two years following construction completion of the proposed project, Hixson shall keep records that demonstrate the steps taken to assure compliance with this mitigation measure.

MMN-3 STAGE EQUIPMENT THE MAXIMUM DISTANCE FROM RESIDENTIAL AREAS AS POSSIBLE

During construction, all noise-generating equipment should be staged at the maximum distance from residential areas. Documentation must be kept on file and available for SCAQMD review. During construction and for two years following construction completion of the proposed project, Hixson shall keep records that demonstrate the steps taken to assure compliance with this mitigation measure.

MMN-4 USE SHORTEST HAUL ROUTES

Haul and delivery routes for the project sites are to be designed to provide the shortest distance through residential areas to reach major streets/freeways and only used during construction hours identified in MMN-1. Documentation must be kept on file and available for SCAQMD review. During construction and for two years following construction completion of the proposed project, Hixson shall keep records that demonstrate the steps taken to assure compliance with this mitigation measure.

MMN-5 INSTALL TEMPORARY SOUND BLANKETS AT BOUNDARIES NEAR NOISE-SENSITIVE RECEPTORS

Temporary sound blankets (fences typically composed of polyvinyl-chloride-coated outer shells with absorbent inner insulation) shall be placed along the boundary of the proposed project sites facing the nearest noise-sensitive receptors during construction activities. Documentation must be kept on file and available for SCAQMD review. During construction and for two years following construction completion of the proposed project, Hixson shall keep records that demonstrate the steps taken to assure compliance with this mitigation measure.

MMN-6 PROVIDE PRIOR NOTIFICATION

The construction contractor shall notify residences within 500 feet of the construction areas of the construction schedule prior to commencing construction. A contact telephone number of the Owner's Authorized Representative shall be conspicuously posted along construction site fences and provided in the notification of the construction schedule to nearby residents. Documentation must be kept on file and available for SCAQMD review. During construction and for two years following construction completion of the proposed project, Hixson shall keep records that demonstrate the steps taken to assure compliance with this mitigation measure.

MMN-7 NOISE BARRIERS FOR OPERATIONAL NOISE MITIGATION

The Facility is expected to construct and maintain noise barriers between the air pollution control equipment and the apartment buildings to the south of the Facility. The noise attenuating noise barriers shall be compatible with the architectural style, materials, and color of the building upon which it is located. Review and approval by the City of Newport must be obtained. Noise reading shall be taken after completion of the proposed project and installation of the barriers to assure the noise barriers meet the specified noise reduction criteria. Documentation must be kept on file and available for SCAQMD review. During construction and operation of the proposed project, Hixson shall keep records that demonstrate the steps taken to assure compliance with this mitigation measure.

3.0 SIGNIFICANT ADVERSE IMPACTS WHICH CANNOT BE REDUCED BELOW A SIGNIFICANT LEVEL

There are no potentially significant adverse environmental impacts that cannot be reduced to a level of insignificance for the proposed project.

4.0 CONCLUSION

During the construction and operation of the proposed project, Hixson Metal Finishing will maintain records onsite of applicable compliance activities to demonstrate the steps taken to assure compliance with imposed Mitigation Measures as specified above and in Table 1. All construction logs and other records shall be made available to SCAQMD inspectors upon request. Hixson will maintain records that summarize the construction progress; include all required logs, inspection reports, and monitoring reports; identify any problems; and, provide solutions to problems, as necessary. SCAQMD will evaluate the effectiveness of this monitoring program during the construction and operation period. If either the monitoring program or the mitigation measures set forth above are deemed inadequate, SCAQMD or another responsible agency may require additional or modified monitoring measures and/or measures to effectively mitigate identified significant adverse impacts to the levels identified in the Final MND.

Table 1 – Mitigation Monitoring and Reporting Plan for Hixson Metal Finishing Risk Reduction Project

| Mitigation Measure/Implementation Requirement | Party Responsible for Implementing Mitigation | Monitoring Action | 1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase |
|--|--|--|--|
| <p>AE-1/ Buildings 2, 3, and 4 shall provide a solid, sound-attenuating screen wall at a minimum height necessary to obscure roof-mounted mechanical equipment from view of the adjacent second-story apartments, as well as provide appropriate noise attenuation. The screen wall shall be textured and painted to be compatible with the architectural style, materials, and color of the building upon which the equipment is located and will be subject to the review and approval of the City of Newport Beach Community Development Department. See also Mitigation Measure N-7.</p> | <p>Hixson</p> | <p>Maintain records documenting the adequacy of the screening wall and maintenance. Maintain records of permits obtained.</p> | <p>1. SCAQMD/City of Newport Beach 2. SCAQMD 3. During construction and Hixson operation</p> |
| <p>AQ-1/ All onsite personnel, including employees and any others working on-site during project construction, must adhere to all provisions within the attached Dust Minimization Plan (See Appendix A of the Final MND).</p> | <p>Hixson</p> | <p>Maintain training records, maintenance records, inspection records, and follow all provisions established in the Dust Minimization Plan for construction activities that involve dust that may be contaminated with CrVI.</p> | <p>1. SCAQMD 2. SCAQMD 3. During construction and Hixson operation</p> |

Table 1 – Mitigation, Monitoring and Reporting Plan for Hixson Metal Finishing Risk Reduction Project (Continued)

| Mitigation Measure/Implementation Requirement | Party Responsible for Implementing Mitigation | Monitoring Action | 1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase |
|--|--|--|--|
| BIO-1/Tree removal activities shall occur outside of the bird nesting season. If construction during nesting season is necessary, a qualified biologist is required to perform a nesting bird survey and sensitive nests must be accounted for with a 100 foot buffer zone (200 feet for birds of prey). | Hixson | Maintain records that document the timing of tree removal activities and nesting bird surveys, as appropriated. | 1. SCAQMD 2. SCAQMD 3. Prior to construction |
| N-1/Prohibit construction activities on weekdays between the hours of 6:30 p.m. of one day and 7:00 a.m. the next day and Saturdays between 6:00 p.m. and 8:00 a.m., or at any time on Sunday or any public holiday, unless a permit has been obtained beforehand. | Hixson | Maintain records documenting construction activity hours. Maintain records any special construction permits received that allow for work outside normal hours. | 1. SCAQMD/City of Newport Beach 2. SCAQMD 3. During construction |
| N-2/ Equip construction equipment with properly operating and maintained noise mufflers, consistent with manufacturer's standards. | Hixson | Maintain records documenting muffler installation and condition for all construction equipment. | 1. SCAQMD/City of Newport Beach 2. SCAQMD 3. Prior to use, during construction |

Table 1 – Mitigation, Monitoring and Reporting Plan for Hixson Metal Finishing Risk Reduction Project (Concluded)

| Mitigation Measure/Implementation Requirement | Party Responsible for Implementing Mitigation | Monitoring Action | 1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase |
|---|--|---|---|
| N-3/Stage equipment to create the greatest distance between construction-related noise sources and the closest residential receptors | Hixson | Maintain documentation of construction activity locations and nearest residential receptors. | 1. SCAQMD/City of Newport Beach 2. SCAQMD 3. Prior to start of construction and during construction |
| N-4/ Construction-related trucks traveling to and from the proposed project sites shall be restricted to the same hours specified for the operation of construction equipment. To the extent feasible, haul routes shall be the shortest route through residential areas. | Hixson | Maintain log of truck activities to and from the sites, including times and routes used. | 1. SCAQMD/City of Newport Beach 2. SCAQMD 3. During construction |
| N-5/ Place temporary sound blankets along boundary of the project sites facing the nearest noise-sensitive receptors during construction activities. | Hixson | Maintain records documenting location and type of sound blankets used. | 1. SCAQMD/City of Newport Beach 2. SCAQMD 3. During construction |
| N-6/Notify residences within 500 feet prior to construction. | Hixson | Maintain documentation of the notice given includes contact phone numbers and to whom notice has been provided. | 1. SCAQMD/City of Newport Beach 2. SCAQMD 3. Prior to construction |

Table 1 – Mitigation, Monitoring and Reporting Plan for Hixson Metal Finishing Risk Reduction Project (Concluded)

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|---|---------------|---|--|
| <p>N-7/ Noise barriers shall be placed between the air pollution control equipment and the apartment buildings to the south of the Hixson Facility.</p> | <p>Hixson</p> | <p>Maintain documentation to demonstrate compliance with the noise reduction requirements for the sound barriers. Maintain records of maintenance activities.</p> | <ol style="list-style-type: none"> 1. SCAQMD/City of Newport Beach 2. SCAQMD 3. During Hixson operation |
|---|---------------|---|--|