File: ① Air, Toxics 106.41 KML
② Pgms, Contracts, N62474-87-D-7073 for action
Bi 4/11
106.415 _____ (Action)

DEPARTMENT OF THE NAVY
NAVAL ENERGY AND ENVIRONMENTAL SUPPORT ACTIVITY
PORT HUENEME, CALIFORNIA 93043-5014

IN REPLY REFER TO:

5090
Ser 112F3/ 403
31 MAR 1989

From: Commanding Officer, Naval Energy and Environmental Support Activity
To: Commander, Mare Island Naval Shipyard (Code 106.4)

Subj: DRAFT REPORTS ON CHROME SCRUBBER PERFORMANCE EVALUATION AND HEALTH RISK ASSESSMENT

Ref: (a) COMNAVSHIPYD Mare Island ltr 5090 Ser 106.413/94 of 8 Mar 89

Encl: (1) NEESA Comments on Performance Evaluation for the Existing Chrome Plating and Emission Control System, Mare Island Naval Shipyard (Review Draft)
(2) NEESA Comments on Health Risk Assessment for the Chrome Plating Facility, Mare Island Naval Shipyard (Review Draft)

1. As requested by reference (a), we are submitting enclosures (1) and (2).

2. Our contact is Jonathan Rogalsky, Code 112F3, commercial (805) 982-3351 or AUTOVON 360-3351.

Robert Wood
ROBERT E. WOOD
By direction

Copy to:
COMNAVFACENGCOM (FAC-182C)
COMWESTNAVFACENGCOM (Code 1824RS)

NEESA COMMENTS ON
PERFORMANCE EVALUATION FOR THE EXISTING CHROME PLATING
AND EMISSION CONTROL SYSTEM,
MARE ISLAND NAVAL SHIPYARD (Review Draft)

1) Section VI. Recommended Operating Conditions

- Giving a minimum rate for blow down water removal of 8,640 gallons/day in your permit will interfere with the Hard Chrome Plating Retrofit at your activity. To perform the retrofit and obtain zero discharge of wastewater from the entire system, your permit would have to be modified and additional testing performed. If the requirement can be left as a maximum concentration of chromium in the scrubber water it will be easier to perform the retrofit without effecting your permit. An even better requirement, for the retrofit, would be a conductivity or pH limit for the scrubber water.

2) Source Tests

- The Bay Area Air Quality Management District (BAAQMD) did not receive a copy of the source test. The air district should review the testing procedures to ensure that they will accept the testing for your permit application.

- Would like to have seen the following in the report:
  a) Laboratory results
  b) Laboratory procedures
  c) Chain of custody
     o How was the sample transported to the laboratory?
     o Was it refridgerated?
     o Were the samples fixed in solution?
  d) Time frame for completion of analysis
     o Within 7 days?

  ** BAAQMD procedures call for fixing sample within 48 hours and completing analysis within 7 days. **

Enclosure (1)

NEESA COMMENTS ON
HEALTH RISK ASSESSMENT FOR THE CHROME PLATING FACILITY
MARE ISLAND NAVAL SHIPYARD (Review Draft)

1) Executive Summary

- Why are the hours of facility operation per year different for the source test and risk assessment data?

2) Section 3.3 GEP STACK HEIGHTS

- The American Conference of Governmental Industrial Hygienists (19th edition) gives a recommended stack height of 1.3 to 2.0 times the height of the building.

- If there are any ventilation intakes on the roof, or any windows near the roof, there would still be the possibility of recirculating stack emissions with a 65′ stack. Suggest increasing stack height to 75′.

Enclosure (2)