



BAY AREA AIR QUALITY MANAGEMENT DISTRICT

JAN 23 1988

FILE NO

ALAMEDA COUNTY
Edward R. Campbell
Shirley J. Campbell
Chuck Corica
Frank H. Ogawa

January 20, 1988

CONTRA COSTA COUNTY
Paul L. Cooper
Sunne Wright McPeak

MARIN COUNTY
Al Aramburu
(Chairperson)

NAPA COUNTY
Harold I. Moskowitz

Mare Island Naval Shipyard
Vallejo, CA 94592

April 20th

Attention: Les Berlot
Code 461, Stop 032

SAN FRANCISCO COUNTY
Harry G. Britt
Jim Gonzalez

SAN MATEO COUNTY
Gus J. Nicolopoulos
Anna Eshoo

Application Number: 465
Equipment Location:
Plating Shop, Bldg. 225
Vallejo, CA 93592

SANTA CLARA COUNTY
Rod Diridon
Ralph P. Doetsch, Sr.
(Vice-Chairperson)
Roberta H. Hughan
Susanne Wilson
(Secretary)

Gentlemen:

Your application for an Authority to Construct and/or Permit to Operate the following equipment:

SOLANO COUNTY
Osby Davis

SONOMA COUNTY
Helen B. Rudee

- S-436 Chrome Plating Tank, (T-4), 18.9ft², 820 gal, 5000 amperes, Bldg. 225;
- S-437 Chrome Plating Tank, (T-3), 18.9ft², 820 gal., 5000 amperes, Bldg. 225;
- S-438 Vapor Degreaser, Detrex VS 800 S, 155 gal., Bldg 225;
- S-439 Chrome Plating Tank, (T-6), 17.7ft², 410 gal, 3000 amperes, Bldg. 225;
- S-440 Chromic Acid Anodizing Tank, 7.3 ft², 70 gal, 500 amperes, Bldg. 225;
- S-441 Chrome Plating Tank, (T-5), 12.6 ft², 100 gal, 5000 amperes, Bldg. 225;
- S-443 Paint Stripping Tank, 70 gal, Bldg. 225;
- S-444 Vapor Degreaser, 30" x 66" QZA, Bldg. 225;
- S-445 Paint Stripping Tank, 440 gal, Bldg. 225;
- S-446 Vapor Degreaser, Detrex VS 800 S, 155 gal, Bldg. 225;
- ~~A~~X-436 Water Scrubber, Trane #U4F3419, 75 GPM, 25,000 CFM;
- ~~A~~X-439 Water Scrubber, Trane #U4F3419, 75 GPM, 25,000 CFM;
- ~~A~~X-442 Water Scrubber, Pace, 75 GPM, 18,000 CFM; and
- ~~A~~X-445 Water Scrubber, Joy Axivane, 75 GPM, 15,000 CFM.

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has been assigned the above application number and is currently incomplete.

In order to complete our evaluation, we need the following:

1. Please perform District approved source tests for sources S436, S437, S441, S439, S440, A436, and A439. Submit a complete emissions report that includes mass emissions of chromium from plating tanks to scrubbers, mass emissions of chromium from scrubbers, and abatement efficiencies of scrubbers. Please include detailed operating parameters such as concentrations of chrome plating solutions, current density (amperes), type of substrate, size of substrate, and air flow rates. Please contact the District Source Test Section for approval of procedures and scheduling. Please notify Source Test Section and me at least two weeks prior to any testing.
2. Perform a cancer risk screen for hexavalent chromium to determine individual cancer risk caused by these emissions. If individual risk is greater than one in a million, perform a detailed health risk assessment for emissions of hexavalent chromium. Preliminary risk calculations based on Districts source tests #88056 and #88076 indicate worst case risk of 3 in thousand.
3. Please submit air flow rates for each emission point.
4. Please submit all applicable forms for the other equipment located at this shop. I have enclosed extra G, P and A forms.

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- 5. The abatement devices that currently control chromium emissions may not be adequate. The Air Sources Board and the District are considering new control measures for emissions of hexavalent chromium from plating and anodizing operations. The ARB has proposed a level of control of 99.8% to achieve the lowest emission rate possible for large sources. This level of control is achievable by the use of wet electrostatic precipitators (ESP). The permitted level of control and emission rate will be based upon the source test data, cancer risk assessment, and proposed control measures.

Please submit the above items within 60 days. ^{or} Your fees will be cancelled. Your application will be acted upon within 60 days of receipt of the above items. Construction of operation or equipment without an Authority to Construct or Permit to Operate can result in appropriate enforcement action.

Please include your application number with any correspondence with the District. If you have any further questions, please call Permit Services at (415) 771-6000, extension 212.

Very truly yours,



Scott B. Lutz
Air Quality Engineer II
Permit Services Division

SBL:djw