

NORMAN L. GRIB, INC.

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APR 05 RECD

March 28, 1990

Mr. Bill Alimam
Mare Island Naval Shipyard
Stop T-56
Code 106.41
Vallejo, CA 94592

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4.5.90

Dear Mr. Alimam:

As you requested, today I met with Mr. Scott Lutz of the Bay Area Air Quality Management District to discuss the results of the source test performed on the chrome plating facility at Mare Island in August of 1988.

According to Mr. Lutz, it is the Bay Area AQMD's procedure to use equipment operating time to calculate emission limits, and not actual operating time.

Since the one-hour tests of the hard chrome plating operations were done while the plating operation was running continually there is no problem with the results of 0.041 mg/amp-hr.

However, the testing of the decorative chrome plating and chromic acid anodizing system was conducted at normal maximum operating rate. This meant that during a 1-hour test run, four 3-minute decorative chrome cycles and a 40 minute acid anodizing operation was conducted. It is the Bay Area AQMD's contention that our measured emission rate of 0.0750 mg/amp-hr should be multiplied by five, since our test was conducted while the equipment was operating only one-fifth of an hour (12 minutes). If this is done, our measured emission rate is 0.375 mg/amp-hr. Since this is greater than the districts limit of 0.15 mg/amp-hr, it is the districts contention that the decorative chrome/acid anodizing operation would be out of compliance, if operated.

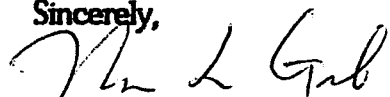
With the above in mind, please note the following:

1. MINSY is not in violation, unless they start up the decorative chrome plating/acid anodizing tanks.
2. If MINSY keeps their permits for the chrome plating operations active, they will be counted in determining whether a risk-assessment is required, or not.
3. If MINSY wishes to use their chrome plating facility, they should propose modifications to the emission control system, which would bring them into compliance. They will then have to show by source test that the new system meets all requirements.
4. If MINSY wishes to completely rebuild their facilities, or move the facilities, they would be considered a new source. As a new source they would have to meet not

only the chrome plating standards, but would also have to perform risk assessments to show de minimus risk.

If you have any further questions, please call me at the above number.

Sincerely,


Norman L. Grib, Ph.D., P.E.