

From: [Nazemi, Mohsen](#)
To: [Luther, Mahiany](#); [Swaney, Jim](#)
Subject: FW: APCD2022-RRP-990008 - Pacific Ship Repair & Fabrication Risk Reduction Plan
Date: Thursday, June 29, 2023 9:46:16 AM
Attachments: [Pacific Ship Draft Permit \(06-16-2023\)-final \(004\).docx](#)

From: Brandon Burns <bburns@pacship.com>

Sent: Friday, June 9, 2023 2:32 PM

To: Nazemi, Mohsen <Mohsen.Nazemi@sdapcd.org>

Cc: David Bain <dbain@pacship.com>; Horres, Nicholas <Nicholas.Horres@sdapcd.org>; James Westbrook | BlueScape <jwestbrook@bluescapeinc.com>; Weller, Allison <Allison.Weller@sdapcd.org>; Brent Moore <bmoore@pacship.com>

Subject: Re: [External] Re: APCD2022-RRP-990008 - Pacific Ship Repair & Fabrication Risk Reduction Plan

Hello Mosen,

After careful review and consultation regarding the Draft Permit submitted to Pacific Ship Repair on May 25, 2023, we submit the following response. Unfortunately, Pacific Ship Repair does not accept the Draft Permit as written due to lingering concerns over the effect on the viability of business operations. The concerns and comments are as follows:

- Under Equipment Description, if the company would like to implement alternative control technologies or equipment by different manufacturers. What is the process for doing so and is there a further cost to the District for doing so? Or, is the company restricted to the specific manufacturers of fume extraction devices and filters identified in the permit?
- Under conditions, paragraph two (2): The phrase "All welding at this facility shall be captured and controlled using one of the portable fume extractors in accordance with applicable permit requirements" appears that it would require all welding operations with any rod/wire be captured with fume extractors, not just those identified in the Toxic Hot Spots report to be exceeding the levels in Rule 1210. This requirement would add an undue financial burden to the company as all welding operations would be restricted to areas with fume extraction and would require the purchase and maintenance of several additional extraction units. We request that this paragraph be changed to reflect that capture of welding fumes by mechanical fume extraction be limited to those rods/operations containing Chrome VI and/or Nickel at the levels indicated in the Toxic Hot Spots inventory and the submitted Risk Reduction Plan to exceed the levels in Rule 1210 (300 and RN series rod and wire).
- Also under conditions, in paragraph two (2), the condition requiring the use of a "portable fume extractor", should be changed to reflect any approved fume extraction device or unit (i.e. the fume hood in the Sheetmetal Shop).
- Paragraph nine (9), 2nd line down states "associated welding operations". For clarification, does "associated welding operations" mean welding operations indicated to contain high chrome VI and or nickel content as identified in the Risk Reduction Plan? Or does "associated welding operations" mean all welding at this facility? If it means the latter, then our concerns are the same as raised in the first bullet of this email.
- Paragraph thirteen (13) restricts our ability to attempt to modify or test different types of

enclosures to reach 90% capture if the initial test fails. If the initial test fails to capture 90% of the welding fumes, then we must revise the risk reduction plan with "sufficient measures to ensure that the applicable significant risk thresholds, as defined by rule 1210, are not exceeded." As worded, this requirement basically eliminates the company's ability to test different capture and containment methods available in the time allotted. We are allowed one (1) test that must be successful, or the District is requiring a complete abandonment of that process and a revision of the Risk Reduction Plan with controls guaranteed to reduce emissions below 1210 within sixty (60) days, regardless of cost, investigation, or research of "possible" alternatives.

- Paragraph fourteen (14), as submitted, still requires us to calculate actual hourly emissions of nickel and annual emissions of chrome VI to ensure that emission levels are below a specified amount per hour or year respectively. It does not make clear if this requirement is effective only if we cannot demonstrate the 90% capture or if it is in addition to that requirement. It also essentially eliminates any possibility to consider alternate methods to showcase reduced emissions in the event the 90% capture is unobtainable tying the company to a time consuming that will almost certainly increase cost and reduce production resulting in a marked financial impact on the company.
- We would also like the permit to specifically state that PACSHIP has a maximum of five (5) years to come into compliance with the approved permit conditions and risk reductions as all options proposed will be both costly and require increased consultation, construction, and testing.

We thank you for taking the time to consider our comments and concerns listed above. Please feel free to contact David or myself with any comments, concerns or clarifications.

R/

Brandon L. Burns, Safety/Environmental Administrator

Environmental, Health & Safety Department

Office: (619) 232-3200 ext. 184

Facsimile: (619) 232-2070

Mobile: (619) 507-6311

Email: bburns@pacship.com



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