

**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:** Nazemi, Mohsen

**Sent:** Thursday, June 29, 2023 9:46 AM

**To:** Brandon Burns <[bburns@pacship.com](mailto:bburns@pacship.com)>; David Bain <[dbain@pacship.com](mailto:dbain@pacship.com)>

**Cc:** James Westbrook | BlueScape <[jwestbrook@bluescapeinc.com](mailto:jwestbrook@bluescapeinc.com)>; Brent Moore <[bmoore@pacship.com](mailto:bmoore@pacship.com)>; Horres, Nicholas <[Nicholas.Horres@sdapcd.org](mailto:Nicholas.Horres@sdapcd.org)>; Weller, Allison <[Allison.Weller@sdapcd.org](mailto:Allison.Weller@sdapcd.org)>

**Subject:** APCD2022-RRP-990008 - Pacific Ship Repair & Fabrication Risk Reduction Plan

Hi Brandon and David,

Thank you for providing comments on the proposed draft permit and conditions implementing Pacific Ship's Risk Reduction Audit & Plan (RRAP). In response to your comments, we have updated the attached draft permit, which considers your comments and ensures compliance with all applicable air quality regulations. Additionally, please find below specific responses to your comments and/or questions.

"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?"

*District Rule 10 states "Any person building, erecting, altering or replacing any article, machine, equipment or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminant, shall first obtain written authorization for such construction from the Air Pollution Control Officer." Prior to issuing an Authority to Construct the District must evaluate the proposed equipment to ensure compliance will all applicable regulations. The Authority to Construct might not specify the make and model of the proposed equipment **as long as all parameters for the proposed equipment are clearly specified in the Authority to Construct such that the equipment installed meets the same parameters/ requirements of the equipment evaluated by the District.***

"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)."

*Please note that the requirements of Rule 1210 apply to all emissions from a stationary source. However, the District has considered your comment and revised the condition to better align with the*

*measures proposed in the RRAP. Therefore, the permit condition will require capture of welding fumes associated with ship building and repair work conducted in Buildings 15, 16 & 24, as well as capture of welding fumes from other welding operations that contain Chrome or Nickel at levels which contribute to the exceedance of the Rule 1210 standards.*

“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).”

*Any device meeting the specifications approved by the District would be allowed.*

“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.”

*The intent of that condition is to require that when welding containing the targeted metals (Nickel and Hexavalent Chromium) is conducted, the appropriate capture system is in use from the start of welding to the end of welding, while not requiring that the capture systems operate when welding is not conducted. The condition has been revised to better clarify and reflect this.*

“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.”

*This condition was intended to implement the measure proposed in Pacific Ship's May 8th email in which it is stated that, "If the test does not demonstrate the capture required, Pacific Ship Repair will update the design and retest until the capture efficiency is met." However the District would like to clarify that the intent is not to completely abandon the original plan, but require that it be amended to address the deficiency and allow the District to review and approve the new method(s) to ensure the measures will meet Rule 1210 requirements. The 60 day deadline is based on requirements in Rule 1210, that requires submittal of a revised plan which can include a timeline to conduct activities such as experimental testing. The District has revised this condition to make this point more clear but notes that the requirement to submit a plan amendment cannot be avoided.*

“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.”

*This condition requires the calculation of hourly nickel and annual chrome VI emissions since these emissions are not being measured and therefore, calculating them is a critical aspect of enforceability. The District also notes that it is likely beneficial for Pacific Ship to maintain as accurate*

*records as possible of welding emissions since less accurate records can lead to higher estimated pollutant impacts and the District is open to working with Pacific Ship if there are specific difficulties related to emission calculations. Regarding alternative methods for reducing emissions, as stated in response to above comment, the District will need to review and approve any proposed alternative measures but calculating emissions will still be required if the reduction measures were to change.*

*“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.”*

*The District Rule 1210 allows for a maximum of five year period to implement reductions and is generally intended for projects where construction of control equipment is a multi-year project as incorporated as part of a schedule in the RRAP. The District encourages and recommends that Pacific Shop come into compliance with Rule 1210 requirements as soon as possible according to a schedule in order to reduce its emissions and health risk and avoid having annual notifications and public meetings. However, the District agrees that if initial testing does not show compliance with the 90% capture requirement, additional time is required to investigate and propose alternatives for review. For this reason, a new permit condition was added (Permit Condition No. 15) to specify that the maximum amount of time for implementation of the risk reduction measures is five years from the date of RRAP Authority to Construct approval, but a revised plan is required within 60 days if the initial proposal is not successful.*

Mohsen Nazemi, M.S., P.E.  
Chief, Engineering Division  
San Diego County Air Pollution Control District  
[mohsen.nazemi@sdapcd.org](mailto:mohsen.nazemi@sdapcd.org)  
Cell: (858)922-1182



San Diego County  
Air Pollution  
Control District

[www.sdapcd.org](http://www.sdapcd.org)

