



Daniel Cunningham  
06-8-3



September 27, 2006

Via Electronic Mail

Chairman Sawyer and Board Members  
California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812

**Re: Additional Information**

Dear Chairman Sawyer and Board Members:

In addition to the information submitted yesterday by the MFASC and STA, we ask that the two attached submissions be considered:

- Attachment 1 – describes an evaluation by the South Coast Air Quality Management District ("SCAQMD") of the source test report summarized in Attachment 5 of our September 26, 2006 letter and previously provided to CARB Staff. Note that the source test showing Cr6 emissions at 0.00013 mg/AH from in tank controls was approved by SCAQMD.
- Attachment 2 – describes source test data from the SCAQMD for chemical fume suppressants and should be considered along with Attachment 7 of our September 26, 2006 letter. These results demonstrate consistent Cr6 results below 0.01 mg/AH. Notably, the tests using a fume suppressant and foam blanket (Run #s 16-18) were performed at a high surface tension and still achieved compliance with 0.01 mg/AH.<sup>1</sup>

Thank you for your consideration.

Very truly yours,

A handwritten signature of Daniel A. Cunningham in dark ink.

Daniel A. Cunningham  
MFASC Executive Director  
STA Executive Director

Enclosures

<sup>1</sup> As demonstrated in the source test summary (Attachment 5 of our September 26, 2006 letter), a foam blanket with low surface tension achieves even greater control.

## **ATTACHMENT 1**

## SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

M E M O R A N D U M

DATE: 8/18/05

TO: Jay Chen

FROM: Rudy Eden *S.M. for R.E.*SUBJECT: Evaluation of Source Test Report:  
(Requested by Sean Cullins, 4/25/05)

SCAGMD ID: FACILITY ID NO. 9120 APPLICATION NO.: C40477  
COMPANY: California Electroplating Inc., Los Angeles  
EQUIPMENT: Decorative Chrome Plating Tank  
TEST LOCATION: 3510 East Pico Blvd., Los Angeles, CA 90023

TEST DATE: 10/23/04

REFERENCE: R05148 (STE Source Test File)

Source Test Engineering has completed the evaluation of the subject source test report and has concluded that it is:

**CONDITIONALLY ACCEPTABLE**

This test report has been classified as "Conditionally Acceptable" due to the failure to include the raw analytical laboratory data in the initial report submittal. Professional Environmental Services (PES) submitted an addendum on 8/17/05 which included an electronic copy of the required data. This analytical data package is not attached to this evaluation, it will be stored with the report folder in Source Test Engineering (STE) and is available upon request.

The attached evaluation has not been forwarded to the facility or the source testing firm. It is the responsibility of the requestor to review the attached evaluation and forward it to the parties involved, if you concur with our findings. If there are any questions, please contact Scott A. Wilson at Ext. 2257.

RE: SM:SAW

Attachment

cc: Steve Marinoff  
Sean Cullins

RCS:48 : RFW 9/15/06

09/26/2006 10:46 6269625905

09/26/2006 09:19

SCRGMD + 916269625905

NO. 339 0022

R05148; REV 9/15/04

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**  
**MONITORING & ANALYSIS DIVISION \* SOURCE TEST ENGINEERING BRANCH**  
**SOURCE TEST REPORT EVALUATION**

ST ID: **R05148**

AQMD ID: FACILITY ID NO. 9120 AON: C40477

COMPANY: California Electroplating Inc., Los Angeles

EQUIPMENT: Decorative Chrome Plating Tank

LOCATION: 3510 East Pico Blvd., Los Angeles, CA 90023

REQUESTED BY: Sean Cullins (Memo Dated 4/25/05)

TYPE OF TEST: COMPLIANCE REPORT DOCUMENT DATE: 11/24/04

REASON FOR TEST: TESTING SUBJECT TO THE FOLLOWING RULE, PERMIT, OR SPECIFIED CONDITIONS:

- R1469

REQUESTED EVAL: Chrome  $\text{Cr}^{+6}$  &  $\text{Cr}^{+3}$

TEST DATE: 10/23/04

TEST FIRM: PES Dennis Beyer (626-962-3278)

ST EVALUATOR: Scott A. Wilson EXT: 1257 REVIEW DATE: 8/18/05

**OVERVIEW OF EVALUATION:**

OVERALL  
CONFIDENCE IN  
REPORTED TEST  
RESULTS:

☐ ACCEPTABLE ☒ CONDITIONALLY ACCEPTABLE ☐ UNACCEPTABLE

RESTRICTIONS FOR  
USE OF REPORTED  
RESULTS:

- No Restrictions. Results for all reported emissions may be used for compliance determination and emission calculations.

COMPLIANCE  
DETERMINATION:

- Results for all emissions, as reported, are in compliance by an acceptable margin<sup>1</sup>, with the Rules/Permit Compliance Limits specified above.

(REFER TO NEXT SECTION FOR COMPLETE DISCUSSION OF TEST RESULTS AND CORRECTED EMISSION INFORMATION, IF APPLICABLE)

<sup>1</sup> NOTE: STE assigns a 10% "margin of error" to most compliance limits when evaluating emissions for compliance determination. This is due to uncertainties assigned to source testing, in general, and errors associated with individual analytical procedures. As a result, some reported emissions may be judged as being in compliance although they appear to be non-compliant or marginally non-compliant. Similarly, non-compliance is judged using the same margin-of-error.



REPORT REVIEW

PAGE 2

**GENERAL TEST GUIDELINES**

(FOR INDIVIDUAL REFERENCE ONLY - NOT INTENDED FOR GENERAL DISTRIBUTION)

**DETAILED REVIEW**

This source test report has been reviewed by the Evaluations Unit staff. The following specifically explains the restrictions concerning the treatment of the reported source test information:

- ☒ Equipment/Process/Test Overview
- ☐ Completeness of Application/Protocol/Report.
- ☐ Representativeness of Data & Process.
- ☐ Rule/Permit Fulfillment.
- ☐ Sampling & Analytical Methods.
- ☐ Quality Assurance
- ☐ Calculations.

**EQUIPMENT/PROCESS/TEST OVERVIEW**

- This test report has been classified as "Conditionally Acceptable" due to the failure to include the raw analytical laboratory data in the initial report submittal. Professional Environmental Services (PES) submitted an addendum on 8/17/05 which included an electronic copy of the required data. This analytical data package is not attached to this evaluation, it will be stored with the report folder in Source Test Engineering (STE) and is available upon request.

## **ATTACHMENT 2**



**South Coast  
Air Quality Management District**

21955 E. Copley Drive, Diamond Bar, CA 91765-6102 (909) 256-2000

Source Test No. 03-212 - 04-219

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Dates 12/12/03 through 2/5/04

**RESULTS for Hexavalent Chromium (Cr VI) and Total Chromium (Total Cr)**

**Enthone Zero Mist Liquid R - Low Surface Tension**

Run #	Total Cr mg/(A-hr)	Cr VI mg/(A-hr)	Cr VI mg/dscm	SCAQMD Stalagmometer dyne/cm	Comments
1	0.0041	0.0008	$4.56 \times 10^{-4}$	24.5	Addition (Zero Mist) just prior to testing
2	0.0065	0.0021	$1.18 \times 10^{-3}$	19.9	No addition needed
3	0.0077	0.0043	$2.58 \times 10^{-3}$	20.5	No addition needed
Average	0.0061	0.0024	$1.41 \times 10^{-3}$	21.6	-
Workplace Background	-	-	$2.35 \times 10^{-4}$	-	-

**Enthone Zero Mist Liquid R - High Surface Tension**

Run #	Total Cr mg/(A-hr)	Cr VI mg/(A-hr)	Cr VI mg/dscm	SCAQMD Stalagmometer dyne/cm	Comments
4	0.0093	0.0026	$1.41 \times 10^{-3}$	30.7	Mixed with fresh solution to raise ST
5	0.0078	0.0018	$9.95 \times 10^{-4}$	28.7	No addition needed
6	0.0043	0.0033	$1.84 \times 10^{-3}$	26.6	No addition needed
Average	0.0071	0.0026	$1.42 \times 10^{-3}$	28.7	-
Workplace Background	-	-	$1.25 \times 10^{-4}$	-	-



**South Coast  
Air Quality Management District**

21000 E. Copley Drive, Pomona, CA 91768-4107 (951) 269-2000

Source Test No. 03-212 - 04-212

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Dates 12/12/03 through 2/5/04

**RESULTS (continued)**

**MacDermid Cleco Chrome Mist Control 74095 - High Surface Tension**

Run #	Total Cr mg/(A-hr)	Cr VI mg/(A-hr)	Cr VI mg/dscm	SCAQMD Stalagmometer dyne/cm	Comments
7	0.0068	0.0044	$2.48 \times 10^{-3}$	45.3	1500 ml (0.06%) addition, >99% foam blanket
8	0.0105	0.0092	$4.72 \times 10^{-3}$	39.3	400 ml addition foam blanket diminishing
9	0.0146	0.0125	$6.42 \times 10^{-3}$	38.5	400 ml addition foam blanket almost gone
Average	0.0106	0.0087	$4.54 \times 10^{-3}$	41.0	-
Workplace Background	-	-	$3.44 \times 10^{-4}$	-	-

**MacDermid Cleco Chrome Mist Control 74095 - Low Surface Tension**

Run #	Total Cr mg/(A-hr)	Cr VI mg/(A-hr)	Cr VI mg/dscm	SCAQMD Stalagmometer dyne/cm	Comments
10	0.0089	0.0056	$3.24 \times 10^{-3}$	29.5	400 ml addition
11	0.0089	0.0056	$3.24 \times 10^{-3}$	29.5	400 ml addition
12	0.0137	0.0103	$5.80 \times 10^{-3}$	30.0	300 ml addition
Average	0.0104	0.0069	$3.94 \times 10^{-3}$	30.0	-
Workplace Background	-	-	$4.09 \times 10^{-4}$	-	-





South Coast  
Air Quality Management District

21500 E. Century Drive, Chula Vista, CA 91785-4100 (619) 594-2000

Source Test No. 03-212 - 04-219

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Dates 12/12/03 through 2/5/04

**RESULTS (continued)****Atotech Fumetrol 140 - Low Surface Tension**

Run #	Total Cr mg/(A-hr)	Cr VI mg/(A-hr)	Cr VI mg/dscm	SCAQMD Stalagmometer dyne/cm	Comments
13	0.0045	0.0021	$1.14 \times 10^{-3}$	23.1	No addition, used bath from Gene's/Noakes
14	0.0050	0.0031	$1.89 \times 10^{-3}$	22.8	No addition, used bath from Gene's/Noakes
15	0.0038	0.0023	$1.24 \times 10^{-3}$	24.9	No addition, used bath from Gene's/Noakes
Average	0.0044	0.0025	$1.42 \times 10^{-3}$	23.6	-
Workplace Background	-	-	$1.34 \times 10^{-4}$	-	-

**Atotech Fumetrol 140 + Dis-Mist NP - High Surface Tension**

Run #	Total Cr mg/(A-hr)	Cr VI mg/(A-hr)	Cr VI mg/dscm	SCAQMD Stalagmometer dyne/cm	Comments
16	0.0035	0.0017	$9.03 \times 10^{-4}$	46.3	500 ml (0.13%) Dis-Mist addition 1" foam blanket >99% coverage
17	0.0037	0.0023	$1.22 \times 10^{-3}$	45.6	No addition 1-2" foam blanket >99% coverage
18	0.0058	0.0032	$1.72 \times 10^{-3}$	51.9	500 ml Dis-Mist addition, 1-2" foam blanket >99% coverage
Average	0.0043	0.0024	$1.28 \times 10^{-3}$	47.9	-
Workplace Background	-	-	$9.50 \times 10^{-5}$	-	-



**South Coast  
Air Quality Management District**

21100 E. Copley Drive, Diamond Bar, CA 91765-4182 (909) 226-2000

Source Test No. 03-212 - 04-219

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Dates 12/12/03 through 2/5/04

**RESULTS (continued)**

**Benchmark Benchbrite CR-1800 - High Surface Tension**

Run #	Total Cr mg/(A-hr)	Cr VI mg/(A-hr)	Cr VI mg/dscm	SCAQMD Stalagmometer dyne/cm	Comments
19	0.0026	0.0016	$9.10 \times 10^{-4}$	41.8	1600 ml addition
20	0.0027	0.0022	$1.21 \times 10^{-3}$	40.4	No addition needed
21	0.0067	0.0062	$3.25 \times 10^{-3}$	39.7	No addition needed
Average	0.0040	0.0033	$1.79 \times 10^{-3}$	40.6	-
Workplace Background	-	-	$1.50 \times 10^{-4}$	-	-

**Benchmark Benchbrite CR-1800 - Low Surface Tension**

Run #	Total Cr mg/(A-hr)	Cr VI mg/(A-hr)	Cr VI mg/dscm	SCAQMD Stalagmometer dyne/cm	Comments
22	0.0044	0.0028	$1.45 \times 10^{-3}$	31.2	Large addition
23	0.0039	0.0022	$1.30 \times 10^{-3}$	31.5	No addition needed
24	0.0057	0.0042	$2.32 \times 10^{-3}$	29.4	No addition needed
Average	0.0047	0.0031	$1.69 \times 10^{-3}$	30.7	-
Workplace Background	-	-	$3.96 \times 10^{-4}$	-	-
Temporary Vent System	-	-	$5.85 \times 10^{-4}$	-	-

M. Dean High  
Environmental Consultant  
78624 Cimmaron Canyon  
Palm Desert, CA 92211  
Telephone: 760-200-1275  
Fax: 760-200-8835  
E-mail: dchigh@verizon.net

September 27, 2006

Via Electronic Mail

Chairman Sawyer and Board Members  
California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812

Re: Errata to 9/26/06 letter to Chairman Sawyer and Board Members From Daniel  
A. Cunningham, MFASC Executive Director, STA Executive Director

Dear Chairman Sawyer and Board Members:

As the Technical Consultant representing the MFASC and STA, I am writing this letter to correct typographical errors/omissions to the subject letter. I was involved and helped prepare the technical information provided therein.

P5, ¶2, line 3 – change 1402 to 212

P5, footnote 3 – add “and August 10, 2006 letter” after See July 26 letter.

P6 – Table 1 4th category 1,000,000-5,000,000 third column – change MICR from 0.5 to  
5

P7 – assumption 2. – change 1402 to 212

P12 – last line – delete the word “remaining”

P14 – last line – change 1.39 to 1.69

P16, Table 3, bottom line – change 59 to 220

P21, last ¶, line 2 – change 001 to 0.01

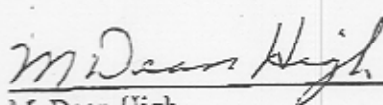
P22, Table 4, last column – change CB = 0.0000 to CB = 0.0066

P22, last ¶, first line – change below to above

P23, first ¶, 2nd sentence - delete sentence and add "The values were determined using SCAQMD's Risk Assessment Procedures for Rules 1401 and 212".

P23, Footnote 22 - delete "an additional magnitude level" (i.e., 0.9 becomes 0.09 per million, etc.) and add "by a factor of 2 (i.e., 0.9 becomes 0.45 per million, etc.).

Very truly yours,



M. Dean High  
Air Pollution Consultant