



April 13, 2007

Ms. Carla Takemoto
Manager, Technical Evaluation Section
California Air Resource Board
Stationary Source Division,
1001 I Street, P.O. Box 2815
Sacramento, CA 95812

**RE: United Airlines' Comments on ARB's Proposed Amendment to Section 93102:
Hexavalent Chromium Airborne Toxic Control Measure for Chrome Plating and
Chromic Acid Anodizing Operations.**

Dear Ms. Takemoto,

Thank you for allowing United Airlines (United) to participate and submit comments to the Air Resource Board (ARB) on the recent preliminary draft amendment, posted April 13, 2007 to Section 93102.

United has reviewed the proposed draft regulation entitled:

Airborne Toxic Control Measure (ATCM) for Chromium Plating and Chromic Acid Anodizing Facilities.

BACKGROUND

The main intent of the proposed regulation is to limit the emissions of hexavalent chromium resulting from operating chrome plating and chromic anodizing operations. United performs a wide variety of aircraft repair and maintenance at the San Francisco Maintenance Center that would be affected by such regulation. These operations include our hard chromium electroplating line and chromic acid anodizing tank:

Currently, United operates eight hard chromium electroplating tanks and one chromic acid anodize tank. All emissions generated from these process tanks are vented and exhausted through newly installed three-stage composite mesh pad scrubbers. We have also elected to use a new eductor system for our plating process, which effectively replaces the standard practice of air sparging. These are individual at-tank scrubbers designed to control particulate (acid mist) matter. These "dry scrubbers" replace the two large centralized counter current wet scrubber – single composite mesh pad and fiberbed mist eliminator combination. The old system was aging and level and costs of ongoing maintenance were just too high.

Training

Our last comments, submitted in November 2006, addressed concerns related to the training requirements in the proposed ATCM. As a large company, with many people tasked with Environmental Compliance, the scope of the original ATCM could have required a large number of personnel to have to attend the CARB Compliance School, of which most courses are not local. As we already maintain an extensive training program, which deals with the same compliance objectives related to record keeping and compliance, as the CARB Training Courses, we are assured that our personnel are all aware of their responsibility and accountability to meet or exceed the CARB Regulatory requirements. The most recent version of the Chrome Plating ATCM still does not provide the flexibility needed for a large operation such as ours, and in fact, proposes changes that will require that we now send almost all of our plating operation personnel to a CARB Compliance Course, some 50 employees. Our operation is a 24/7 shop, and one off-shift (afternoon and midnight shifts), is sometimes supervised by other departmental supervisors. While not specifically trained on plating, they do manage the employees who are specifically trained on all operational requirements. It also now specifies that CARB trained personnel be onsite at all times, during all operations, which will require that we send more personnel to CARB Training, which is not local, and for some, not necessary. Our shop personnel undergo very specific training for their assigned tasks, and are more than aware of their compliance requirements and objectives.

We also have concern that, in our case, there will be interpretational differences between the promulgating agency original intent, and our enforcing agency. We believe that this rule must be clear and concise as it pertains to training requirements. Again, we are not a small operation with a small number of personnel who can easily go outside for training. Our in-house training will meet and exceed the training requirements needed to meet your regulations, and we ask that you seriously consider our request

The United Airlines Maintenance Center is a Title V Facility, and as such, is subject to a variety of regulations and oversight due to its environmental impacts. As a large industrial facility, we are also under the scrutiny of the State of California Occupational and Health Administration (Cal-OSHA) for maintaining compliant protective measures for our employees. No where else are there as many safety requirements as our Plating Operations. The specific training that is given to Plate Shop personnel is very task detailed, and addresses issues such as limiting drag-out from tanks, clean up of spills, and maintaining and inspecting equipment for proper operations i.e. hoists, tanks, fixtures, and Personal Protective Equipment. As a Permit By Rule Authorized facility, we must also meet many daily, weekly, and annual training and inspection requirements. Also, we provide training to our operators and document this training to meet FAA regulations, as well as those found to support our ISO 9001 Certification. Finally, all UA personnel undergo annual environmental compliance training, also documented, to ensure our personnel understand their own responsibilities for handling of hazardous wastes, water discharges, and handling of hazardous materials.

We feel that the requirement to send "all responsible personnel" to an Air Resources Board Training Course would be an overburden. In an operation such as our Plating Shop, there is no one person who is solely responsible or accountable for environmental compliance. We feel that the impact of any individual, especially in an operation like this one, could have serious consequences, and thusly, we hold each employee responsible for his or her actions. We do acknowledge that our Management Team holds ultimate accountability for the operations at our facility, but this could also be construed that they, too, would all have to attend a training course.

We know that this regulation will affect many smaller operations throughout the State, and that their size and scope would require that only one person from a given company attend a CARB Compliance Course. In this case, we would ask that the regulation allow for a small number of key personnel i.e. supervisor, lead plating mechanic, or environmental compliance representative to attend a CARB Compliance Course, to assure that our training programs meet or exceed the requirements established by your agency. We would also submit that our training program and records be reviewed during regular enforcement inspections to ensure that we continue to meet the ATCM requirements.

To summarize our comments, we provide extensive training to our Plate Shop personnel and operators that, we feel, meets and/or exceeds those training requirements found in the Chrome ATCM. To require those personnel, deemed responsible for compliance, would require almost all Plate Shop personnel to attend a CARB mandated training course. We would ask that the ATCM allow for "in-house" training programs such as ours, subject to verification by CARB or that local agency that may be tasked with enforcing compliance of this ATCM.

Sincerely yours



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