



November 10, 2006

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 (10/22/2006) amendment 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 comments submitted in August 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. The revised proposed draft addressed our concerns by allowing one or two representatives from our operations to attend the required training courses. As we already maintain an extensive training program, which deals with the same compliance objectives related to recordkeeping 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 has now reverted back to the original training requirements, which can be interpreted that anyone tasked with maintaining compliance with the ATCM must attend a CARB Compliance Training Course. This places a burden to send well over 40 of our personnel offsite for training.

We respectfully ask CARB to re-consider their approach to compliance training by requiring a training program which has this type of effect on larger companies such as United Airlines. We recognize the responsibility of all affected entities to maintain compliance with the regulations, but find that while it is easier for a smaller operation to send one to two responsible members to a CARB Training Course, the wording as now stated in the most recent version of this ATCM has a substantial impact on larger entities such as ours.

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 "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 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 single 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.

We appreciate the opportunity to participate in the rulemaking process, and workshops such as those held in support of the development of this ATCM. Over the years, we find the input of the affected, and the willingness of the regulating agencies to work with those affected entities, can only produce an effective and productive regulation that offers the best compliance and protection for all involved.

Sincerely yours

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