



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

May 29, 2003

Mr. Steve Hill
Permit Evaluation Manager
Bay Area AQMD
939 Ellis Street
San Francisco, CA 94109

re: Significant Revision to Major Facility Review Permit -- United Airlines San Francisco Maintenance Center, Facility #A0051

Dear Mr. Hill:

EPA appreciates the opportunity to review and comment on the April 16, 2003, proposed Significant Revision to the United Airlines ("UAL") Title V permit for the San Francisco Maintenance Facility. We have the following comments concerning the proposed significant revisions:

1. Aerospace NESHAP for Miscellaneous Coating Paint Booths (S137, S149)

EPA concurs with the District assessment in the permit evaluation that the Aerospace Manufacturing and Rework Facilities NESHAP does not apply to the Miscellaneous Coating Paint Booths since UAL does not use these booths to coat parts and assemblies critical to aircraft structural integrity or flight performance. See 40 C.F.R. § 63.741(f). However, EPA recommends that the District add a condition to the Title V permit specifically prohibiting the coating of critical parts and assemblies in these Miscellaneous Coating Paint Booths.

2. Pressure Drop Across Control Devices for Chrome Plating Operations (A-48, A-49)

EPA notes from the permit evaluation that the District based original permitted control device pressure drop requirements upon the results of performance tests conducted by UAL on the A-48 and A-49 Composite Mesh Pad/Mist Eliminators. However, the actual basis of UAL's current request to change the pressure drop range for A-48 and A-49 to 2-18 inches water is not clear. The Permit evaluation states in application #006913, page 2, that "United has surveyed all other affected components of the scrubber system and has determined that the proposed pressure drop range is acceptable."

Letter to Mr. Steve Hill

Page 2

In addition, although the permit evaluation states that Koch-Otto York (the equipment manufacturer) has documented to UAL that the control devices have a suggested operating range of 2-20 inches water, the permit evaluation does not state whether this manufacturer supplied documentation is based upon actual emissions testing data. UAL should justify the pressure drop range with actual emissions testing data.

EPA therefore concurs with the District adding a permit condition requiring UAL to conduct bi-annual source testing to demonstrate compliance with the hexavalent chrome emission limit of 0.006 mg/amp-hr after abatement. In addition, EPA recommends that the permit contain a condition requiring UAL to conduct compliance testing of the control devices during representative operations, and to retest sooner than once every two years should the control devices begin to operate outside the previously tested pressure drop ranges.

Please feel free to call me at (415) 972-3974, or have your staff call Mark Sims of my staff at (415) 972-3965 if you have any questions regarding our comments.

Sincerely,



Gerardo C. Rios, Chief
Air Permits Office