

**Cc:** Janet Stromberg; Facca, Gina L. (Cupertino) NA; Glen Long

**Subject:** RE: Modeling Results

**Importance:** High

Thank you Eric. I have attached to this e-mail a recent laboratory analysis for Green Coke from Conoco Phillips Company in Arroyo Grande. This is one of the locations Hanson will get some of their Pet Coke from. One key element of this analysis is that the hexavalent Chromium content of the actual Pet Coke as compared to Total Chromium is less than 1%. According to Jeffrey Rolle, president of this Laboratory, when Pet Coke or Coal is combusted, Total Chromium will be oxidized to the predominate Trivalent state. His research also identified that up to 8% of Total Chromium content may be further oxidized to the hexavalent state. At 8% of the total chromium, the risk assessment Glen prepared, would yield a risk at the MEI of well less than 1 in a million.

By the way, the test method EPA 3060A is sample prep. Test Method 7199 is an acid digestion/ion chromatography.

We look forward in reviewing your draft permit. We are available this week to meet with you at your office should you have any further questions.

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**From:** Eric Chan [mailto:echan@baaqmd.gov]

**Sent:** Monday, April 23, 2007 11:05 AM

**To:** Wolf, Doug

**Cc:** Janet Stromberg; Gina.Facca@hanson.biz

**Subject:** RE: Modeling Results

Doug,

Glen was out last Thur & Fri. He will pass on the permit folder to me today or tomorrow with the written estimates. The risk is 1.3 in a million assuming all chromium is hex chromium. I'm sure we can work out some permit condition to limit the risk to 1 in a million, with a lower initial throughput of pet coke, and increasing the throughput limit upon further test samples from operating with the pet coke that shows more clearly the % hex chom in the coke.

Thanks for your patience

Eric

-----Original Message-----

**From:** Wolf, Doug [mailto:Doug.Wolf@lfr.com]

**Sent:** Wednesday, April 18, 2007 5:51 PM

**To:** Eric Chan; Wolf, Doug

**Cc:** Janet Stromberg; Glen Long

**Subject:** RE: Modeling Results

Thanks Eric for the update. Tomorrow we will work on the Appendix H information. I completed one for the last permit I worked on for Schnitzer Steel. I spoke with Gina Facca, Hanson, after we spoke and she said Hanson would be amendable to conduct a Source Test this fall while operating on PetCoke. They have NESHAPs testing to perform then and can add testing for Hexavalent Chromium as well. By testing in the fall, by the way, it would take them about that long to get to the point where they can run off of 100% PetCoke, you would have at least two data points from this facility with Hexavalent and Total Chromium data. The first point, is the 2002 Delta test we provided in the application. That test was done during their last