

Comments on the Alimam Memorandum

This memorandum is not quite what it appears to be. On its face it is a financial argument in favor of permanently closing the plating shop. But it is really an argument based upon the secret desire to keep the knowledge from the victims of the plating shop of how seriously they had been poisoned. This is demonstrated by the last page of the memorandum. It is a diagram of the plating shop and surrounding buildings contained within a circle with its center being the plating shop. It is not explained in the memorandum but it is the real content of the memorandum and it tells us the people who received the memorandum needed only to see that diagram to know it was a good idea to close the plating shop. The financial language used in the memorandum is just a cover to keep the real purpose secret.

The source of this circle is a set of EPA regulations about how to calculate the influence of pollutant emissions from a source, like the Mare Island plating shop, on the surrounding area. It defines the "Immediate Vicinity" around a pollution source such as the plating shop. The Immediate vicinity means the area in which emissions from that shop will have maximum health impact and where it can be assumed the emissions of poison from the shop will NOT be diluted by ambient air. These regulations contain a diagram showing that if a polluter does not want to carry out a scientific study to determine the effect of a polluting source in the immediate vicinity he can use a rule of thumb. The page from these EPA regulations that shows the "rule of thumb" circle one must draw around a polluting source to find the immediate vicinity around a pollution source is included here. As you can plainly see, the example for building 1 shown on that EPA Manual page, the radius is the same size as Mr. Alimam used in his drawing. From this we can understand the meaning of this drawing and what Mr. Alimam is really saying in his memorandum.

Mr. Alimam puts what should be first, last. The drawing says it all. All of the people working in all of the buildings contained within the circle of the drawing were severely poisoned by the tremendous amount of chromic acid belched from the plating shop. If they had the knowledge to file claims over this it would cost the U.S. Navy more than had been spent (millions) to keep the plating shop operating permits. The message of the memorandum really is "We have severely poisoned a lot of people, they have a right to be compensated if they find out what we have done to them and it's cheaper by far to just close the shop before we are forced by California State Law to conduct a health survey that is a public document that will inform them of what we have done to them".

The two EPA Regulation books are available on the Internet and they are:

1. EPA, Publication EPA 454/R-92-019, "Screening Procedures for Estimating the Air Quality Impact of Stationary Sources Revised".
2. EPA, Publication EPA-450 / 4-80 023R, "Guideline for Determination of Good Engineering Practice Stack Height (Technical Support Document for Stack Height Regulations)".

DETERMINATION OF THE IMMEDIATE VICINITY, R,
FOR THREE TYPES OF STRUCTURES

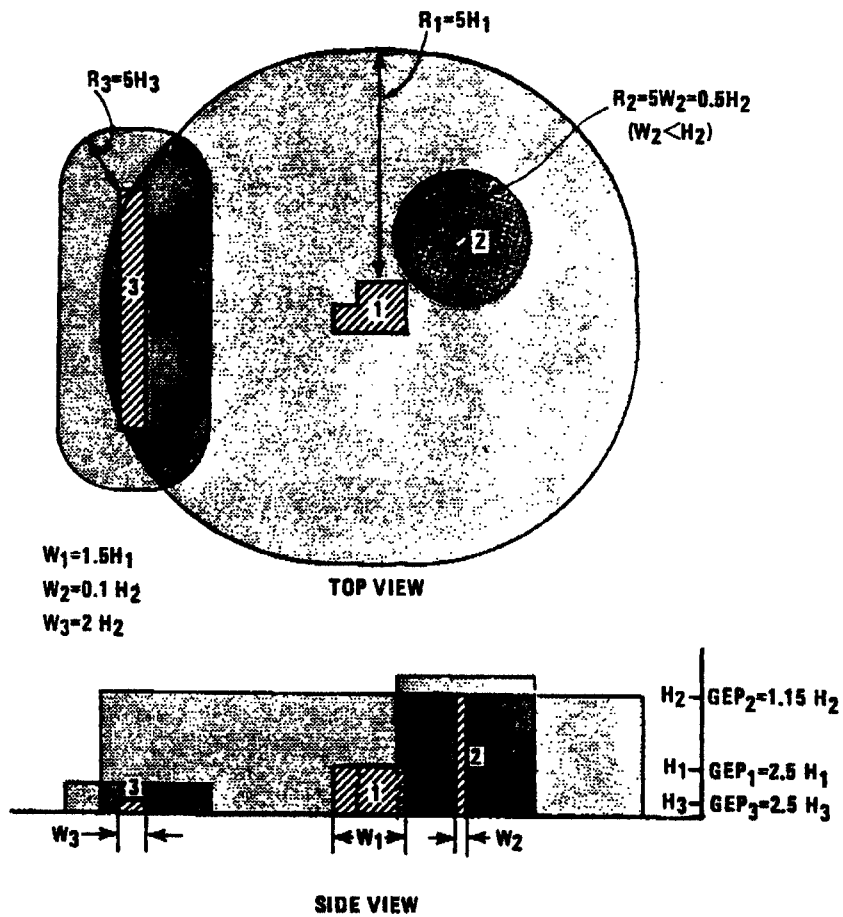


Figure 8. Determination of the GEP stack height near three types of structures.

File: Air, Toxics

MARE ISLAND NAVAL SHIPYARD
YARD ROUTE SLIP

Ser 106.413/191

Env., Plating Shop Status

CODE 106.413	STOP T-56	NAME B. Alimam <i>BA</i>	EXTENSION 3375	DATE 04-05-90
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| <input type="checkbox"/> ACTION | <input type="checkbox"/> COORDINATE | <input type="checkbox"/> PREPARE DRAFT | <input type="checkbox"/> RETENTION |
| <input type="checkbox"/> AS DISCUSSED | <input type="checkbox"/> FILE | <input type="checkbox"/> PREPARE FOR SIGNATURE | <input type="checkbox"/> RETURN |
| <input checked="" type="checkbox"/> COMMENT/CONCUR | <input type="checkbox"/> INFORMATION | <input type="checkbox"/> REPORT BACK | <input type="checkbox"/> |

TO CODE	INITIALED		SUBJECT
	BY	DATE	
			AIRBORNE TOXICS PROGRAM, CHROME- SHOP SOURCE PERMITS

106.41	<i>copy</i>		COMMENTS
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HIGH PRIORITY ≠ HIGH RISK

106.4A	<i>Hand copy</i>	<i>4/5/90</i>	TOTAL SCORE (TS) ≥ 10 = HIGH PRIORITY
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106.4	<i>copy</i>		
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1. HIGH PRIORITY RATED FACILITIES WILL BE REQUIRED TO CONDUCT A HEALTH RISK ASSESSMENT STUDY FOR EITHER: THE ENTIRE FACILITY OR - ONLY A NUMBER OF TOXIC SOURCES, DEPENDING ON THEIR RANKING. UPON COMPLETION OF THE STUDY (DUE DATE 1 JAN 91), HIGH PRIORITY FACILITIES WILL THEN BE CATEGORIZED AS HIGH OR LOW RISK.

2. AT MARE ISLAND, THE CHROME PLATING SHOP 1988 EMISSIONS OF HEXAVALENT CHROMIUM HAVE DRIVEN OUR TS TO ABOUT 700; THIS WILL TRIGGER A FACILITY - WIDE* HEALTH RISK ASSESSMENT STUDY, LIKELY TO COST THE NAVY HUNDREDS OF THOUSANDS OF DOLLARS IF WE MAINTAIN THE SHOP SOURCES "PERMITS TO OPERATE". ALTERNATELY, IF WE CANCEL THE ^{PLATING SHOP} "PERMITS", THE BAY AREA AIR MANAGEMENT

*"FACILITY" MEANS MARE ISLAND NAVAL COMPLEX.

Copy to:
106
385

DISTRICT (BAAQMD) WILL NOT COUNT THE PLATING SHOP SOURCES DURING THE RANKING FOR THE PURPOSES OF RISK ASSESSMENT; IN THIS EVENT OUR TS WILL DROP TO ABOUT

MARE ISLAND NAVAL SHIPYARD
YARD ROUTE SLIP

Ser 106.413/191

CODE 106.413	STOP	NAME ALIMAM	EXTENSION	DATE 04-05-90
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TO CODE	INITIALED		SUBJECT
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CHROME PLATING SHOP SOURCE PERMIT - cont'd -

COMMENTS

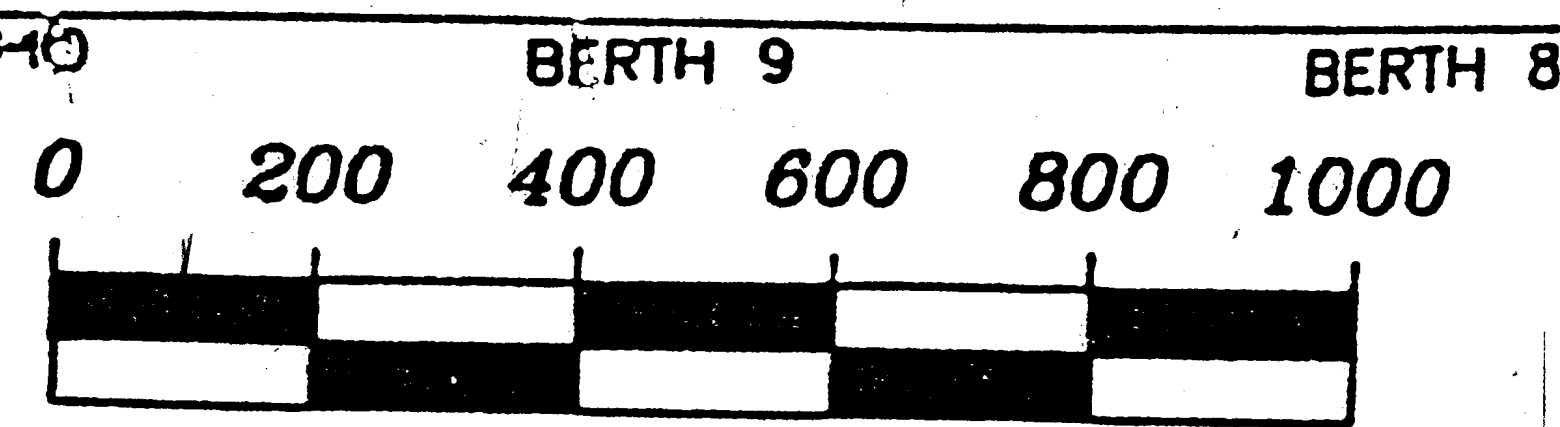
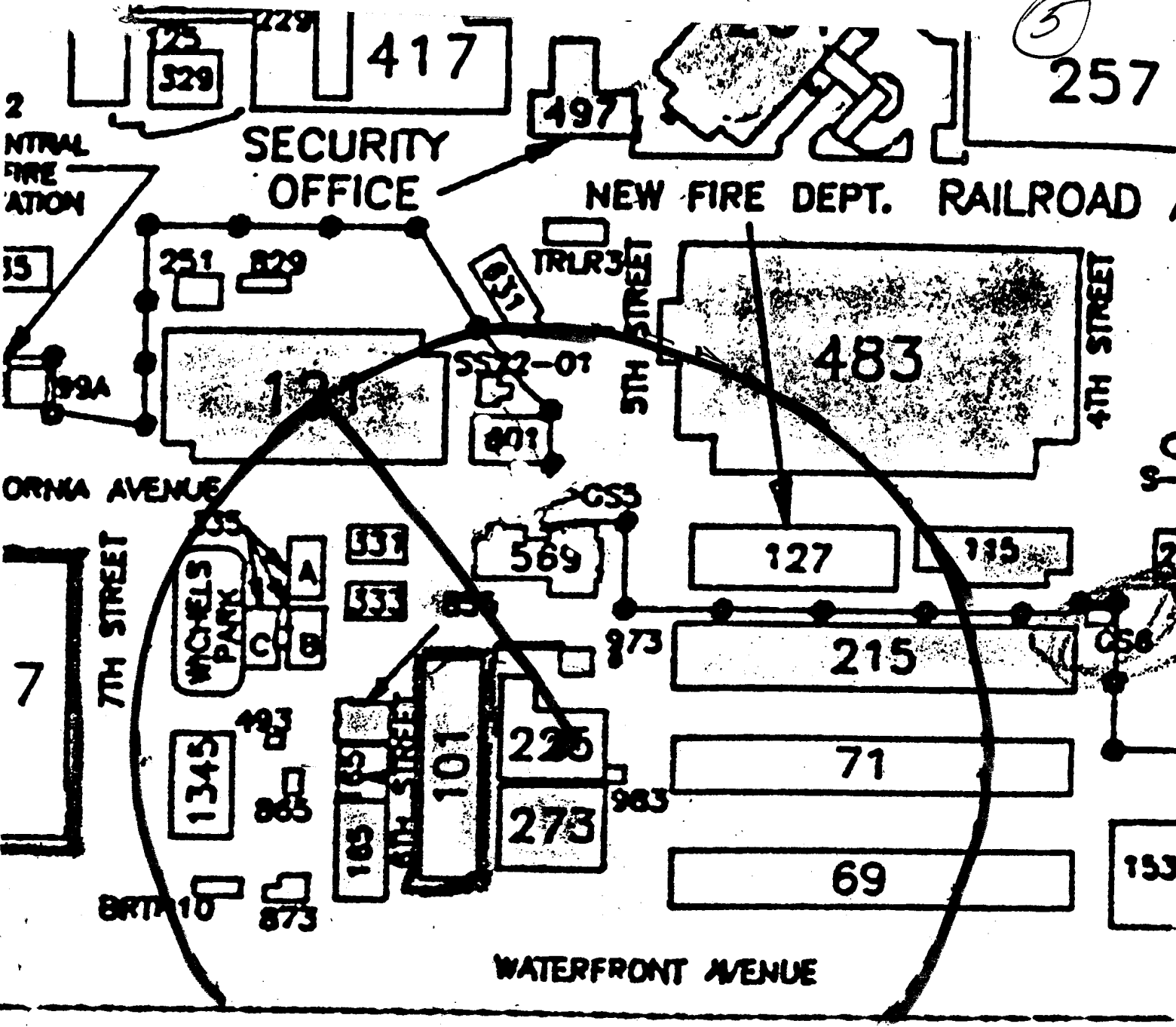
3. IN VIEW OF THE FACT THAT THE SHIPYARD IS
CONTEMPLATING EITHER RELOCATING OR UPDATING THE CHROME
PLATING SHOP, WHICH IN EITHER CASE REQUIRES A NEW
PERMIT APPLICATION, IT IS STRONGLY RECOMMENDED THAT WE
CANCEL OUR "PERMITS TO OPERATE" THE EXISTING PLATING
SHOP.

4. CANCELLING THE EXISTING CHROME PLATING SHOP PERMITS
PRIOR TO THEIR EXPIRATION, 1 OCT 90, WILL:

A. IMPROVE THE SHIPYARD PRIORITIZATION RANKING.

B. SAVE THE NAVY THOUSANDS OF DOLLARS

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1000 FEET