



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT  
SINCE 1955

December 05, 2006

Ms. Catherine Witherspoon  
Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

Re: Proposed Amendments to Airborne Toxic Control Measure for  
Chrome Plating and Chromic Acid Anodizing Operations

Dear Ms. Witherspoon:

I am writing as a follow-up to my letter to you dated September 27, 2006, regarding the Bay Area Air Quality Management District's (BAAQMD) comments on your staff's proposed amendments to the Airborne Toxic Control Measure (ATCM) for Chrome Plating and Chromic Acid Anodizing Operations. The proposed amendments would strengthen this ATCM, and thereby provide a further measure of public health protection.

The primary concern expressed in my September 27, 2006 letter, and in testimony provided by BAAQMD staff at the September 28, 2006 Public Hearing on this matter, was that the proposed amendments would require add-on controls for most decorative plating facilities within our jurisdiction without the option for more cost-effective alternative methods that could achieve stated emission limits.

Based on comments received, your staff modified the original proposal considered by the Board on September 28, 2006, and issued draft rule amendments dated November 30, 2006. We have reviewed this modified proposal, and find that it adequately addresses our earlier concerns. Nearly all of our decorative platers fall within the new category created for facilities with a sensitive receptor distance more than 330 feet, and with annual throughput less than or equal to 500,000 amp-hours. Under the new proposal, these facilities will have to meet the very stringent 0.0015 mg/amp-hr emission limit, but not be required to use an add-on control device if compliance can be demonstrated using multiple plating bath additives or other alternative control methods.

Thank you for considering our comments, and modifying the proposed ATCM in a way that provides public health protection while allowing flexibility in terms of more cost-effective control options. If you have any questions or

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Tom Bates  
Scott Haggerty  
Janet Lockhart  
Nate Miley

CONTRA COSTA COUNTY  
John Gioia  
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(Vice-Chair)  
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Tim Smith  
Pamela Torliatt

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

*Spare the Air*

Ms. Catherine Witherspoon  
December 05, 2006  
Page 2 of 2

would like to discuss this matter further, please call me at (415) 749-5052 or  
Brian Bateman, Engineering Division Director, at (415) 749-4653.

Sincerely,



Jack P. Broadbent  
Executive Officer/APCO

JB:BFB

cc: Clerk of the Board, Air Resources Board