

# **Comment 1 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: CARB Board Governance / PFAS / Falsehoods  
Comment:

To the CARB board members,  
CARB states in the Initial Statement of Reasons for the ATCM (ISOR, Page 8, second paragraph of 2. Environmental Impacts and Benefits), and I quote,  
&ldquo;An additional co-benefit of the proposed phase out is the elimination of perfluoroalkyl and polyfluoroalkyl substances (PFAS/PFOS) contained in the fume suppressants used in chrome plating operations.&rdquo;  
The quoted statement contains the following falsehoods.  
False Statement 1 - &ldquo;&hellip;contained in the fume suppressants used in chrome plating&rdquo;. The reason this is false is because according to the CARB website here <https://ww2.arb.ca.gov/resources/documents/fume-suppressant-information>, the use of PFAS/PFOS fume suppressants has been banned in California since 2016. CARB maintains a list of approved and unapproved fume suppressants here <https://ww2.arb.ca.gov/resources/documents/chrome-plating-approved-fume-suppressant-list>.  
You can verify that the footnotes show the PFAS/PFOS fume suppressants are not allowed.  
False Statement 2 - &ldquo;An additional co-benefit of the proposed phase out is the elimination of perfluoroalkyl and polyfluoroalkyl substances (PFAS)&rdquo;. The reason this is false is that a benefit can only exist when change occurs as a result. In this case, there is no change. Fume Suppressants are not being used by California chrome platers. So, no co-benefit is achieved by eliminating something already eliminated.  
I provided this comment to the staff previously in one of the recorded working meetings. I am disappointed that it remains in the documents that are now being presented to the Board for decision. The inclusion of PFAS/PFOS as a co-benefit is a dog whistle that un-necessarily attracts attention to this rule-making and increases pressure upon the board to make decisions which are not based on current facts and data. If the board truly believes that PFAS/PFOS are still being used by chrome platers in California then it is an enforcement failure which would shine the light directly upon the CARB.  
As an individual decision maker on the CARB board, you should ask yourself these questions.  
1) Why is staff adding this element to the decision I am being asked to make?  
2) Are the other benefits of the

proposed ATCM so weak that these falsehoods and this appeal to emotion were necessary?

3) Does CARB staff respect the independent decision-making authority of the board or is the board a rubber stamp?

Thank you for your service on the CARB board.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-02 09:47:30

No Duplicates.

**Comment 2 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Hunaid  
Last Name: Nulwala  
Email Address: Nulwala@lumishieldtech.com  
Affiliation: Lumishield technologies

Subject: Please ban Chrome and chromating  
Comment:

Unless regulations don't take a charge we will never be able to grow sustainable solutions.  
There are solutions which replace Hex chrome.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-02 17:14:49

No Duplicates.

**Comment 3 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: JIM

Last Name: MEYER

Email Address: jmeyer@aviation-repair.com

Affiliation:

Subject: CORRECTION and APOLOGY to the Board

Comment:

I have been informed by a knowledgeable party that the premise of my comment made on 12-2-2022 was incorrect. There are some hex chrome plating firms that do use PFAS fume suppressants. They do that because PFOS was banned but not PFAS. Some platers do use PFAS fume suppressants; purportedly because their air permits require it.

So, I apologize to the CARB board for my ignorant statement.

Our facility does not use PFAS or PFOS and never has. That would seem to make us a potential asset to the State of California - A hex chrome plater, with HEPA controls and no PFAS/PFOS dependency or liability and with a mission to support the national aviation infrastructure and the national defense. Yet, the ATCM bans us.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-05 13:42:28

No Duplicates.

## **Comment 4 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: AB 617 Community Emissions Reduction Plan  
Comment:

Attention CARB board members.  
South Coast AQMD and leaders in this community spent many months, days, and hours to create a Community Emissions Reduction Plan under AB 617. Please have your staff take a look at it. It is for the Wilmington, Carson, West Long Beach Community which CARB consistently uses as a poster child for disadvantage relative to the environment. The Cal Enviro Score in West Long Beach near Cabrillo High School is in the 96th percentile.  
Here is the final CERP published in 2019.  
<https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf?sfvrsn=8>  
On page 3a-9, the chart shows the total cancer risk in our area by cause. It shows that cancer risk from diesel is more than 1000 in a million but that cancer risk from ALL OTHER SOURCES COMBINED (INCLUDING HEX CHROME) is less than 240 per million. So, why does CARB, in the ISOR document take pains to point out that hex chrome is 500 times more cancer potent than diesel? That is a very misleading way to present potency information. The AQMD method of presentation is much more honest. CARB staff should be ashamed of that. Why bring up diesel in the hex chrome ISOR document at all? Your staff knows these numbers and this data but has consciously chosen to present it in the most fear provoking way possible. Is diesel so prevalent that we measure and express cancer risks relative to diesel in ATCMs so people can understand? Has diesel pollution become the standard to which other risks are compared? Pretty pathetic approach to science and to communication of real risk if you ask me. It is certainly not representative of an organization purporting to be the World Standard in air pollution control.  
An astute reader will go on to note that the same cancer risk chart on page 3a-9 shows the relationship between diesel and other air toxics IN THE ENTIRE SOUTH COAST BASIN which is home to 86 of the 113 hex chrome facilities in this ATCM. This isn't just an isolated area this is the vast majority of what your decision will impact with the ATCM. The data shows diesel FAR outweighs hex chrome in terms of cancer risk to the entire South Coast community.  
But let's talk about hex chrome a little bit more.  
Look at Page 3b-1 of the CERP. I am intrigued by the information in the box that states hexavalent chromium is a key air toxic in this

community and that the cause is MOSTLY FROM BRAKE  
WEAR... yet we should BAN chrome platers.  
If you ban chrome platers the employees who live here will become  
unemployed, how does that help them or the people in this  
community?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-06 16:20:07

No Duplicates.

**Comment 5 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Rich  
Last Name: Roberson  
Email Address: richroberson@outlook.com  
Affiliation:

Subject: A Process Comparison: Hexavalent vs. Trivalent Hard Chrome  
Comment:

Hexavalent Cr

Trivalent Cr

Excellent deposit properties

Struggles with many issues

Simple bath chemistry

Very complicated bath formulation

Very good corrosion resistance

Requires a nickel deposit first

Fewer tanks & less floorspace

Much larger plating lines

Reverse etch activation

Needs an alkaline cleaner and acid dip

Broad operating window

Sensitive to operating conditions

Easy to control & maintain

Daily analysis & additions needed

Tolerant to bath impurities

Very sensitive to many impurities

Uses standard lead anodes

Expensive MMO anodes required

Tolerates water additions

Sensitive to water concentration

Bath additions not a problem

Requires 'Bleed and Feed'

Indefinite bath life



Periodic bath dumps required

Easily Zero Discharged

Waste treatment always needed

Over 100 years of success

New and unproven

Much lower investment

Considerable higher entry cost

Inexpensive to operate

Significantly higher operating costs

Many possible vendors

Tied to a single supplier

Easily made Sustainable

Considerable waste generator

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-06 16:41:34

No Duplicates.

**Comment 6 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Art  
Last Name: Holman  
Email Address: art@sherm splating.com  
Affiliation: Sherm's Plating

Subject: Public Comment  
Comment:

"Please add the two attachments to the public comment section for Chrome ATCM."

Comment uploaded by CARB Staff on behalf of Art Holman

Attachment: 'www.arb.ca.gov/lists/com-attach/11-chromeatcm2023-VDUCdlMmAw8GaARr.pdf'

Original File Name: Art Holman.pdf

Date and Time Comment Was Submitted: 2022-12-12 18:08:50

No Duplicates.

**Comment 7 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Eric  
Last Name: Soiland  
Email Address: esoiland@sonic.net  
Affiliation:

Subject: Chrome Metal Finishing  
Comment:

CARB has targeted a small industry to move the pressure off the State. Business will be forced to close, thousands of jobs will be lost, supply chains and consumers will have to find sources outside of the State of California. Other States that do not have the regulations and controls that California shops have in place.

The three finishes of Decorative, Functional Chrome Metal Finishing and Chromic Acid Anodizing represent less than 1% of total ChromeVI Emissions for the entire State of California.

When an entire industry is gone and CARB still has 99% Hex Chrome in air emissions who will be targeted next? Banning Chrome in the State does not make the demand go away; it only creates more pollution from mobile emission sources such as trucks and cars. Why ban Hex Chrome in a State that has it under control?

Fun Fact: Based on the reported annual emissions CARB provided (2018-2019) all of the decorative chrome platers in the state emitted less hexavalent chromium at .00856 lbs per year less than the popular theme park resort in Anaheim at 0.106 lbs per year.

CARB should base the rule on real science and data, not emotions.

Please do NOT shut down our local chrome shops&hellip;there has to be a better way

Regards,

Eric Soiland  
2211 Spyglass Drive  
Brentwood, CA 94513

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-12 17:53:04

No Duplicates.

**Comment 8 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Scott  
Last Name: Babcock  
Email Address: sdwbabcock@gmail.com  
Affiliation:

Subject: plating  
Comment:

Hello,  
I work as  
an engraver with many California platers who are restoring  
brightwork on vintage cars, usually in preparation for major shows  
such as the Concours d'Elegance in Pebble Beach.  
It would  
sadden me greatly to know that all of the high-quality chrome work  
that currently goes on in our state would be prohibited, in an  
effort to mitigate a very small percentage (less than one percent I  
understand) of the Chrome VI emissions currently being emitted  
statewide.  
I am also  
an environmental advocate, and recognize the need to control  
pollution of all kinds. However, this proposal seems out of balance  
with regards to the benefit/cost ratio. So many businesses will  
have to close, and people like me will also be discouraged from  
doing business in California.  
I do  
believe there are less Draconian ways of controlling emissions that  
would benefit a majority of the state's residents and businesses,  
and not just be a bullet point on a political agenda. Let's not  
make the plating industry be the fall guy!  
Thanks  
for listening.  
Best,

Scott Babcock

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-12 22:03:06

No Duplicates.

**Comment 9 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Rodger  
Last Name: Lee  
Email Address: iskhotrods@yahoo.com  
Affiliation:

Subject: HEx Chrome  
Comment:

my name is Rodger Lee and I have used Sherm's Chrome plating for 20 Years and a hand full of other chrome shops in Ca. I have been in business here in CA for 20 years building these very high end custom cars and I currently employ 18 people. We build very high end automobiles for clients all over the country. The chrome work that Sherm's custom Chrome plating is my go to source for quality chrome work. From where I sit there are 2 other Chrome shops in the country that do the work these guys do. One is in Ohio and another in Tennessee. If you outlaw the hexavalent chrome I would be forced to send our work to another state or risk being not competitive with other builders who send their chrome work to other chrome shops outside of CA. Plus the lead time currently for this level of work is 12-16 weeks any where you go and the lead time would get even longer if there was only two vendors and not 3. If all my work is going to be shipped across the country what is the real gain in your proposed legislation. Does the pollution not travel across state lines? Plus the huge expense for something I usually hand deliver from Bakersfield to avoid UPS damaging priceless parts.

I have no idea the pollution issues with both Chromes, but what if it's all outlawed in the US it's just going to be done overseas or across the border. The need for top quality Chrome happens from the craftsmen level prep and the use of quality plating supplies.

Forcing us to go to another or across the border is not a big help for all parties involved.

I can tell the difference from HEx and TRI. It's not nearly as good and if I tried to pass off the lesser quality to my customers they would know. The depth, clarity and color are all different.

If you have anymore further questions or concerns please feel free to follow up. I'm sure there is some solution to allowing Sherms and other high end platers follow stricter guidelines without forcing more people to flee CA.

The transportation segment is nearly a 100 times bigger issue that the decorative chorme platers.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-13 05:56:07

No Duplicates.



**Comment 10 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Christopher  
Last Name: Moore  
Email Address: Chris@ironworksspeedandkustom.com  
Affiliation:

Subject: Chrome  
Comment:

My name is Christopher Moore. I am a manager at a high end custom car shop that has been using chrome plating for 20 years. We build very high-end automobiles for clients all over the United States. The hexavalent chrome work that Sherm's Custom Chrome Plating does is some of the best in the country. They are our "go to" source for quality chrome work. In our opinion there are 2 other Chrome shops in the country that put out the quality these guys put out. One is in Ohio and another in Tennessee. If you make it illegal to use hexavalent chrome in CA we will be forced to send our work to another state. If all of California's chrome plating is going to be shipped across the country what is the real gain in your proposed legislation? If this legislation is passed you are now causing more pollution. You are doing this because the chrome plating is not going to just stop. It will continue but it will have to be shipped out of CA and then back to CA. Do you think that pollution will not cross state lines? Forcing us to go across the border is not a big help for all parties involved. It will just continue to raise the prices in this time of inflation. We can tell the difference from hexavalent and TRI. TRI is not even close to the quality of hexavalent chrome. If we were to try to pass off the lesser quality to our clients they would see the difference and would leave our shop for shops in other states. Please do not force more people to flee CA. I believe California can be one of the best states in the union; we just need to stop hampering capitalism. Please shut down this proposed legislation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-13 05:59:35

No Duplicates.

## **Comment 11 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: William  
Last Name: Ganahl  
Email Address: southcityrodandcustom@gmail.com  
Affiliation: South City Rod and Custom

Subject: Chromium Plating Ban in California  
Comment:

To  
whom it may concern,

I own a small business here in California restoring classic cars. I restore and customize cars from the 1920's through the 1960's, all of which have many chrome pieces. We restore these cars to an extremely high level, and they have been shown around the country, and some around the world. We compete for awards, which is a big part of our business, and the finish and texture of the chrome on these cars is a detrimental component of our ability to compete at a high level. I know that there are many shops here in California (the epicenter of custom and classic car culture) that share the same experience and produce the same level of quality as we do. We absolutely cannot use any other method or quality of chrome plating than hexavalent chromium to complement the quality of our builds.

I understand that if Hex Chrome is banned in CA, we could potentially send our parts out of state to be chromed. First, we currently do not ship any parts to chrome; we personally deliver all parts so as not to damage or lose any of these valuable pieces. Many of the parts are hand-made from scratch and have countless hours into their fabrication and manufacture. And many of the parts are very rare, very valuable original pieces that cannot be duplicated or replaced. For this reason, we cannot take the risk of shipping parts and having them damaged or lost. And second, it is typically California's intention to set precedent by example; if other states follow suit and hex chrome is banned in America for good, it would seriously affect the entire industry of classic and custom car building and restoration. This could mean job losses in both the chrome industry AND the classic and custom car industry, which I think you will find is a very large industry (just look at the number of car events and TV shows currently).

All of this said, the amount of pollution caused by the hex chrome process is miniscule compared to the large-scale production of mass-produced commodities. We are building one to three cars per year, which means our collective use of the chrome process is very small. It is an essential part of these builds, yet a

very small portion of the overall output of chrome shops in general. But there are chrome shops that specialize in our specific, very high standard requirements, and they would be devastated by this ban. They are all upstanding businesses (the ones we deal with) that already comply with state and federal laws, and some of which would already comply with proposed laws, as they want to stay ahead of the curve and curtail pollution and emissions.

Please consider amending your proposed legislation to allow for concessions for my industry. If this might mean allowing small production numbers, while banning production over a certain limit, I am positive that the businesses in my industry would fall well below any threshold of significant pollution. Car culture, while not appreciated by everyone, is an integral and important element of Californian and American popular culture. It is part of our history that we are trying to maintain and carry on, and it represents a huge industry that affects multitudes of businesses that contribute to the craft.

Thank you  
for your consideration,

Bill  
Ganahl

--

South City Rod & Custom  
22432  
Thunderbird Place  
Hayward, CA  
94545  
(510)  
783-6300

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-13 09:18:08

No Duplicates.

## **Comment 12 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: CARB and EJ - Where did Science go?  
Comment:

In the past, we have been able to depend on the California air regulators for taking science based, data driven approaches to solve problems. This ATCM proposal is evidence that science and data are trumped by politics.

According to the SCAQMD MATES V study, there are over 300 pounds of hex chrome emitted annually in the region. Note, that is only in the South Coast area, not the entire state. Let's call it 500 pounds in the state.

According to the CARB ISOR, SRIA, and Appendix B of this ATCM, the amount of PERMITTED Hex Chromium emissions by chrome platers in THE ENTIRE STATE is 10.19 pounds.

According to the CARB Appendix B of this ATCM, the ACTUAL Hex Chromium Emissions by chrome platers in the ENTIRE STATE are 0.901 pounds.

So, this proposed rule bans decorative platers in the short term, and functional platers in the long term to save less than 0.2% of the hexavalent chromium emissions in the state. That is one pound out of 500.

CARB presents the purpose for the rule change as being necessary to achieve environmental justice goals. (See the purpose section of the ISOR pages 1 to 5). But, based on data, this doesn't even seem to be valid. You can see for yourself if you take the time to read the AB 617 process Community Emissions Reduction Plans from the following environmental justice communities: 1) Wilmington, Carson, and West Long Beach; 2) San Bernardino / Muscoy; 3) East LA, Boyle Heights; 4) East Coachella; 5) South LA; and 6) Southeast LA. All of those community generated plans (with one

exception) appropriately recognize that chrome plating firms are not an area of concern. So, who is CARB listening to?

Why would CARB move to implement a STATEWIDE ban based on what might be an issue in one EJ community? Keeping in mind that metal working is a major job engine for California, is this how social justice is supposed to work. Do jobs count for anything?

It seems to me that the whole point of the EJ movement is to be responsive to people in their communities. So, to do that, the state (CARB) should not implement statewide edicts that impact communities other than the ones where problems may exist. Otherwise, they create more problems than they solve! Things just get worse in more communities.

It is a fact that stainless steel contains

chromium. According to CARB and AQMD and science, the heating, forging, grinding, milling, melting, welding, and cutting of stainless steel releases hexavalent chromium. It isn't just chrome plating. So, is this rule-making a shot across the bow to the entire metal working industry in California? Should we all just leave now? After all, the metal finishers were told repeatedly that since there is no "safe" level for hexavalent chromium it was necessary for CARB staff to propose this complete ban based on California health and safety laws. They say they have no choice. If that is the case, then machinists, welders, recyclers, fabricators, heat-treaters and all other metal workers will soon join the chrome platers in the unemployment line.

According to the American Cancer Society, hexavalent chrome causes cancer. Somehow, the California Health and Safety Code and therefore CARB bans it.

But, also according to the American Cancer Society, alcoholic beverages (wine) cause cancer. California markets it to the world and our governor owns a wine business. I call bullstuff on the lie that CARB is forced to impose a ban.

There are serious problems at CARB. They are being pulled away from data and science. It is hurting the state. High-paying, middle-class jobs are leaving. As CARB focuses on satisfying squeaky wheels it loses credibility on this and other important work. The job of a regulator is to adopt thoughtful rules, a ban is not thoughtful. CARB should adopt an emissions based approach.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-13 12:22:57

No Duplicates.

**Comment 13 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Bryan  
Last Name: Leiker  
Email Address: bleiker@klanodizing.com  
Affiliation: MFASC-MFANC-NASF

Subject: MFASC-MFANC-NASF Previous Comments Compilation 12-13-22  
Comment:

The Metal Finishing Association of Southern California, the Metal Finishing Association of Northern California, and the National Association for Surface Finishing submit the attached comments that the associations previously submitted on June 4, 2021, June 7, 2021, June 9, 2021, February 3, 2022, May 11, 2022, and July 19, 2022. We reaffirm and reiterate each of the comments in these communications.

Attachment: 'www.arb.ca.gov/lists/com-attach/19-chromeatcm2023-VThcPARaBzcAZwR2.pdf'

Original File Name: MF CARB CrVI ATCM Prior Comments Compilation 12-13-22.pdf

Date and Time Comment Was Submitted: 2022-12-13 13:03:15

No Duplicates.

## **Comment 14 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jason  
Last Name: Wenig  
Email Address: jpw@thecreativeworkshop.com  
Affiliation: Owner/President - The Creative Workshop

Subject: Comments regarding the Hexavalent Chromium Airborne Toxic Control Measure (ATCM)

Comment:

To whom it may concern:

My name is Jason Wenig and I am the owner of The Creative Workshop. The Creative Workshop is a nationally recognized, highly specialized car workshop business &ndash; noted for the forensic restoration of rare, exotic and unique, historically significant automobiles.

I am

writing this letter as a representative of a billion dollar industry that works hand and hand with the decorative chrome industry &ndash; an integral and critical part of the highly specialized work we conduct.

Specifically, it seems California is looking to ban all use of Hexavalent Chrome. The subject of this initiative through CARB is &ldquo;Hexavalent Chromium Airborne Toxic Control Measure (ATCM)

for Chrome Plating and Chromic Acid Anodizing Operations&rdquo;.

I have

been deeply involved in the automotive world for over two decades and have worked with countless suppliers, craftsmen and supporting industries. My company was named a &ldquo;Top 20 Restoration Company&rdquo; in the country in 2018 by one of the industry&rsquo;s leading publications and I was awarded &ldquo;Master Craftsmen of the year&rdquo; in 2019 by the America&rsquo;s Automotive Trust. My biography is attached for further reference.

The

vehicles entrusted to my company are some of the rarest and most valuable in the world, and require a diverse set of skills and supporting infrastructure to work on them. Akin to rare artwork or historic building restoration, the vehicles we work on are meticulously and authentically rebuilt &ndash; using historical archives, original factory drawings and documents and numerous other, sometimes rather arcane methods. In addition, the materials, supplies and technology utilized to restore and maintain these historic artifacts are equally obscure.

Vintage

cars touch all walks of life &ndash; and have become something much more than a niche hobby. To further reinforce this reality and the nature of these vehicles, we work with the Historic Vehicle Association, which is working in collaboration with the U.S.



Department of the Interior in developing a National Historic Vehicle Register to carefully and accurately document and recognize America's most historically significant automobiles, motorcycles, trucks and commercial vehicles. This project is the first of its type to create a permanent archive of significant historic automobiles within the Library of Congress.

As you

can imagine, working with historically significant vehicles &ndash; and in turn, our collective history &ndash; details matter. As historians entrusted with this responsibility, when considering these details, &ldquo;close enough&rdquo; is not good enough. There is &ldquo;correct&rdquo; and &ldquo;incorrect&rdquo;, &ldquo;right&rdquo; and &ldquo;wrong&rdquo;. We work incredibly hard to ensure that restorative work is done correctly and right. Along these lines, the coatings used throughout the history of the automobile is very much a part of our responsibility to get right, and quite simply put &ndash; there is no substitute for proper, Hexavalent Chrome. Historians, collectors, aficionados, curators &ndash; we all know the difference between &ldquo;proper decorative chrome&rdquo; vs alternatives. Alternatives cannot be used and should not be used on these incredibly valuable and coveted assets.

Said

another way, house paint would not be used to restore a Picasso just as plywood would not be used to restore a Tall Ship. To the untrained or uneducated eye, paint is paint and wood is wood &ndash; but for the integrity of our history, there is obviously a rather large difference when it comes to &ldquo;correct&rdquo; and &ldquo;right&rdquo;.

How we

protect our history comes down to the front lines of the craftsmen that are entrusted to restore and maintain it &ndash; and the &ldquo;tool kit&rdquo; we have available to us, simply cannot be diminished.

What

further complicates this situation is that the number of businesses dedicated to automotive decorative chrome continues to shrink &ndash; with a troubling few businesses left that are capable of doing this kind of work. The few that do remain, simply must be protected - we can't afford to lose any more plating companies &ndash; wherever they may be located. For instance, we work with Sherm's Custom Plating in Sacramento, California ([www.shermsplating.com](http://www.shermsplating.com)). It took us years to find them. We performed tests with numerous companies located around the country, and only Sherm's had the skills, capabilities and understanding of how to deliver correct, authentic chrome for historic cars.

An

outright ban on this industry in California will cause irreparable repercussions that will ripple throughout the industry &ndash; not just for the plating companies located in California, but to and through all of the companies that rely on their services to &ldquo;get the job done right&rdquo; across the Country.

Massive

events around the world celebrate the automobile &ndash; including the most prestigious car event in the world - the Pebble Beach Concours d'Elegance located in Monterrey, California. Cars invited to and displayed at Pebble, set the standard for the history books. The wealthiest individuals in the world attend, and the most valuable vehicles in the world are on display. Hundreds of millions of dollars of automotive history are on display every August &ndash; and simply put, chrome alternatives would never be

accepted during the judging process &ndash; whereby the best and correctly restored vehicles are awarded. This reality would repeat itself at events the world over.

What&rsquo;s interesting and salient is that the volume of materials and supplies used for this critical work is small compared to its importance, and pales in comparison to the volumes used in general industry, where chrome alternatives could readily be accepted. Penalizing small boutique businesses (and the low volume of supplies they use) to solve a problem that is fundamentally not caused by this group - that is already tightly regulated - is both near-sighted and counter-intuitive. The benefit to result ratio is completely off by targeting the decorative or even specifically, the automotive show chrome industry.

The

decorative chrome industry, as well as other supporting disciplines to the automotive world, are used to operating under regulations and controls &ndash; including proper hazardous waste disposal, limitations on volume, specialty filtration and particulate control, etc. We understand this is done so a partnership between business and protecting our environment can establish itself. This balance and partnership is in place and evolves as necessary. An all out ban, of the entire industry in California &ndash; combining low-volume automotive businesses along with larger commercial or industrial platers, again, seems counter-intuitive.

For the

record, I am particularly sensitive to this subject matter and debate. I am originally from New York, where my Father, the late Dr. Jeffrey Wenig, was director of Environmental Protection during the 1970&rsquo;s. I grew up with the environment and our care of it, as an integral part of our lives. I take these matters very seriously and I am not writing this letter and voicing my opinion arbitrarily. I am hoping that healthy debate and logical terms can be established for the benefit of all parties involved.

All

said, I implore you to understand the true nature of our industry and its reliance on a small portion of the Hexavalent Chrome that we use &ndash; and to engage with the vested community, so that we can continue forward in collaboration and partnership &ndash; considering all implications to our industry, our history, jobs and of course the environment.

I am

available to provide any additional information or discuss in any way to help further this process along.

Thank

you,

Jason Wenig

Owner and

President

The Creative

Workshop

118 Hill Street

Dania Beach, FL 33004

954-920-3303

jpw@TheCreativeWorkshop.com

Attachment: 'www.arb.ca.gov/lists/com-attach/20-chromeatcm2023-WzoHdVAyBDpRCFR5.docx'

Original File Name: ATCM - Concerns.docx

Date and Time Comment Was Submitted: 2022-12-13 16:41:17

No Duplicates.

## **Comment 15 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: SRIA analysis is flawed and does not agree with CARB data  
Comment:

I submitted the text below addressed to the CARB Board, CARB Staff, and the California Department of Finance on June 26, 2022. In the email, I refer to actual emissions of 2.2 pounds which is the amount of actual emissions referenced in the SRIA. However, the latest CARB document (Appendix B) on this website now shows that actual emissions are 0.9 pounds annually. CARB's numbers don't match. Hmmm. Actual emissions have dropped by more than half since June? I guess this just weakens CARB's case all the more. An analysis based on actual experience would show even less emission reduction. Is this SRIA even a viable document anymore? At what point in this regulatory process does the State stop the presses to validate the basic data from which economic assessments are made?

TEXT FROM EMAIL OF JUNE 26, 2022  
FOLLOWS....

The most important number in the Chrome ATCM SRIA is 2.2 pounds. You can find it in Table 2.1 on page 21 of the SRIA. Go look at it. It is important. The total pre-pandemic hexavalent chrome emissions from chrome platers in California is 2.2 pounds annually. A fact &ndash; 2.2 pounds annually.

The most revealing number in the Chrome ATCM SRIA is 132 pounds. You can find this number on the top of page 2. It is the purpose for the rule. According to the SRIA, rule adoption will eliminate 132 pounds over 20 years. That is an average of 6.6 pounds per year. From a starting point of 2.2 pounds. It bears repeating. The new rule will eliminate 6.6 pounds per year from the currently emitted total of 2.2 pounds per year.

There would be no chrome platers after 2039 so emissions will be 0.0 pounds. Sacramento math is exposed. Specifically  $(2.2 - 6.6 = 0.0)$ . Remember, the Chrome ATCM SRIA is a combined product of the California Air Resources Board and the California Department of Finance and yet it implicates the California Department of Education.

It is not a co-incidence that CARB and the California Department of Finance separate these two numbers, the big flashy benefit savings on page 2 and the actual emissions on page 21. The key to big savings results are big baseline

assumptions. Section 1.6 and the footnotes in Table 2.1 describe the method and assumptions for establishing the baseline. The inflated baseline is justified in the following ways:

They create the concept of "potential" emissions. These are emissions that facilities could make, at the discretion of the facility, which are not currently prohibited by permit throughput limits. You are led to believe chrome emissions will, or could, go up to this level, but that is not a good assumption. Experience shows us that chrome plating emissions have done nothing but decline in California for decades. They assume that pollution control equipment operates at no better than the permit efficiency level or lacking pollution control equipment, that facilities are emitting the maximum.

They created a magnification factor to account for data they did not collect from all facilities, and they chose the highest "at limit" assumption about that data.

Finally, they added a disclaimer, "Using emission limits may overestimate actual emissions at some facilities." A more accurate statement could have been "Using emission limits does overestimate actual emissions at facilities in aggregate" and they did do exactly that.

The result of this creativity is a baseline of 10.19 pounds per year if you read page 15 and 10.15 pounds per year if you look at Table 21. We could question the discrepancy between 10.19 and 10.15 but we will move on because there is something more important that you should be aware of. At the beginning of this email, we talked about 6.6 pounds per year of savings. That number is derived because the rule doesn't eliminate hex chrome until 2039 so it is an average over 20 years. Beginning in 2039, at elimination, the benefit is 10.15/10.19 pounds per year. So, the Sacramento math is even worse ( $2.20 - 10.19 = 0.00$ ).

Let's get back to discussing the baseline assumptions - the "potential" emissions and "(in)efficiency" of pollution control devices. Chrome platers deserve some credit. They do currently operate within limits and are choosing to operate with a margin of safety below the limit. They do this to assure complete compliance. "Potential" emissions are foregone in order to assure compliance and are already achieved. Additionally, many chrome platers have invested in expensive pollution control equipment which operates at a higher efficiency than required by rule limits. Assuming inefficiency equal to the rule limit is not valid - especially in view of source test data in the possession of regulators that is referenced in the SRIA. So, the baseline is arbitrarily high. It assumes both these factors do not already exist. But they do. Emissions have already been reduced by the chrome plating industry. As a result of improvements in Rule 1469, there is not a need for additional regulation. This is plainly evident and explains the nearly 5 to 1 ratio between the baseline and actual experience. These concepts should not be used to inflate a baseline or to justify the costs proposed in this ATCM. The costs the rule would impose on plating firms and the California economy should not be justified by phantom elimination of emissions that have already been eliminated.

It is also important to understand that the

assumed baseline does not include fugitive emissions and that none of the quantified benefit is from fugitive emissions. Additionally, there is no quantified benefit from PFAS elimination. Despite the lack of data and specificity on either fugitives or PFAS, the benefits of eliminating them are discussed. This is unfortunate and misleading. The discussion attempts to provide a basis for the board to support (and perhaps vote for) this rule proposal in the absence of data. Do not be misled. Fugitives and PFAS evoke fear. Without quantification or estimation, they should not be discussed. If they can be quantified, CARB should present the data so that it can be discussed effectively. Note, there are already rules in place and in development against use of PFAS. Additionally, AQMD Rule 1469 already has significant controls against fugitive emissions.

Hexavalent chrome in ambient California air is at record low levels, see <https://www.arb.ca.gov/adam/toxics/statepages/cr6state.html>. The 2.2 pounds which would be eliminated by the proposed rule are a factor of 10X less than at least one other non-mobile hexavalent chromium source known to the CARB and to SC AQMD. Effective regulation of hexavalent chromium in California demands that regulatory resources are directed at the most fertile opportunities for improvement. The chrome plating industry has been highly regulated in California. Industry emissions improved before the adoption of SC AQMD rule 1469 and should be expected to continue to improve following its update in 2019. It should be noted that 2019 is the basis for many of the datapoints in the SRIA and 2.2 pounds is likely a high estimate of current emissions. There is not a need for a new CARB rule. Application of the current SC AQMD Rule 1469 to the entire State of California is a much more effective path.

Thanks for your time. The Hex Chrome ATCM referenced repeatedly in this email can be found here. <https://dof.ca.gov/wp-content/uploads/Forecasting/Economics/Documents/SRIA-Chrome.pdf>

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-14 08:54:26

No Duplicates.

**Comment 16 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Brett  
Last Name: Cowan  
Email Address: bmcowan@msn.com  
Affiliation:

Subject: Ban on Hex Chrome in California  
Comment:

My name is Brett Cowan and I've been an automotive mechanic and classic car enthusiast for over 30 years. I'm writing today to oppose the ban on Hex chrome in California. Not only will this do nothing to diminish any pollution in the state of California it will merely drive out more small businesses that barely got by during your Draconian measures put into place during the great Covid 19 debacle. This seems to be a witch hunt against the automotive industry that seems to be one of Gavin Newsome's favorite past times. It doesn't appear the science behind this decision really has any merit. Once again the State of California is attacking the freedoms and rights of working class citizens with false accusations and unproven science. Quit focusing on the small Mom and Pop shops that make this country and this State what it is and focus on the real issues (homelessness, crime, political insider trading, illegal immigration, fentanyl) just to name a few.  
Thank you....Brett Cowan

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-14 17:22:12

No Duplicates.

**Comment 17 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Eric  
Last Name: Svenson, Jr  
Email Address: ericjr@plating.com  
Affiliation: Plating Resources, Inc.

Subject: Hexavalent Chrome  
Comment:

Hexavalent chrome platers produce approximately 1% of the hexavalent chrome emissions in the State of California. How does the air quality improve by closing these facilities? CARB should be focusing on restricting the sources that make up the other 99% of hexavalent chrome emissions to improve California's air quality.

There is no suitable replacement for hexavalent chrome. The market rejects trivalent "decorative" chrome; and no process comes close to the functionality and benefits of hard chrome, which is a requirement for specifications such as Boeing BAC5709, MIL-STD-150F and many others. A ban on hexavalent chrome would negatively impact the defense and aerospace industry in California. Please submit the attachment to the Public Record.

Attachment: 'www.arb.ca.gov/lists/com-attach/23-chromeatcm2023-UDhXNFcuUmBVJVQ1.pdf'

Original File Name: Hexavalent Chrome.pdf

Date and Time Comment Was Submitted: 2022-12-19 07:38:08

No Duplicates.



**Comment 18 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Appendix B (The Emissions Inventory) is not correct  
Comment:

Appendix B contains data errors, spreadsheet errors, calculation errors, and assumption errors. To the extent it is the source of any allegations, conclusions, statements, or any logic basis in support of the ISOR, SRIA, or the rule formulation, it should be corrected.

The data shown for our facility shows incorrect emissions, incorrect emission permit limits, and incorrect source test emission rates. It is difficult to find any row of data in the appendix that correctly represents any facility. If CARB is able to identify the correct data and calculations to support the rule making, we request a new 45 day comment period following the release of a new appendix B. It is only fair. A rule making like this, in which there is an opportunity to decrease overall hexavalent chrome emissions in the state by 0.2% and will eliminate thousands of jobs, damage the state economy, and disrupt several industries deserves to be based on correct data.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-19 14:26:35

No Duplicates.

**Comment 19 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Toward Rule Improvement  
Comment:

As stated previously, the rule language itself could improve by...

- 1) Recognizing that some chrome platers who do not use PFAS/PFOS, are not located near schools, are not located near sensitive receptors, have fully compliant HEPA systems and 1469 compliance, are located in CalEnviroScore areas with no population and therefore no CalEnviroScore, but perform vital work that supports the national commercial aviation and DOD infrastructure (e.g...us) should have a right to exist until a substitute technology can be identified. Don't ban us before the replacing technology is identified, ban us after the replacing technology is identified. For us, the substitute technology won't be trivalent plating. Take out the ban language associated with hard chrome platers - no one can raise capital with that in there.
- 2) Implementing AQMD 1469 statewide. That's it. No need for anything else.
- 3) Reducing the source test requirement to a frequency of five years.
- 4) Allowing currently permitted facilities to add/change permits so long as compliant to emissions regulations (i.e..1469).
- 5) Allowing decorative platers a way to comply rather than a hard ban.

Thank you for your consideration.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-19 16:13:06

No Duplicates.

## **Comment 20 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Computing the Cancer Risk for my facility  
Comment:

Let's look at the risk from our facility using the data that CARB provides on pages 173 to 175 of the ISOR. CARB breaks the risk up into two pieces, the risk to residents, and the risk to off-site workers in the area.

We are located in an industrial zone in the 90813 zip code area. There are no residential buildings within 500 meters. According to figure V.1 that means that our cancer risk to residents is ZERO.

Yes, zero risk to residents. But, let's go on and look at offsite worker risks. At the bottom of page 175, CARB states, and I quote,

"For the 2019 baseline, the estimated potential cancer risks range approximately from less than one in a million to 17 chances per million, depending on the level of plating operations at the facility."

So, we can use this to compute the cancer risk. Even though 17 in a million is the worst case, and even though it would be better for my illustration to use one in a million, we will use the higher number; even though we are a smaller facility. How many offsite workers are there around us? We don't know for sure but we can make a useful estimate.

The 90813 zip code is one of the densest in the state (#31 as a matter of fact) and has a density of 18,175 people per square mile. If we draw a circle around our facility at a radius of 500 meters, the area is 0.3 square miles. Applying a little arithmetic, we can compute an estimate of 5,452 workers within that circle if the work force is dispersed at a similar density to residents. But maybe it is not, so let's make an extreme assumption about the number of workers within 500 meters of us and say it is 25,000. Our assumption is between 5,000 and 25,000 people work within 500 meters of us. Using the highest figure, we can compute that 0.425 offsite workers ( $25,000 \times 0.000017 = 0.425$ ) might get cancer. Let me repeat that number 0.425.

And looking at a previous sentence CARB states that, and I quote: "The guidelines assume that a worker at a nearby worksite is exposed to the emissions for 25 years, 250 days per year, and 8 hours per day."

So, in order to get 0.425 cases of cancer, we need 25,000 people to stay within 500 meters of this facility for 8 hours a day, 250 days per year, for 25 years!

There it is, for my facility, using CARB's numbers and conservative assumptions, we get less than 1/2 of one cancer case. I hope you get the point.

So why after more than three years of engagement in this ATCM process with CARB and the preceding rule 1469 process with AQMD and CARB is this small business dealing with the existential threat of a ban? Who is in charge? Is anyone at CARB capable of making a decision to stop this madness? Is this what AB 617 hath wrought? We are being damaged.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-21 15:23:31

No Duplicates.

## **Comment 21 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Enjoy your Holiday Air Travel  
Comment:

Metal finishing disciplines support commercial aircraft. Decorative chrome is mostly used on interiors. Functional anodize is used all over the aircraft to protect parts from corrosion. Hard Chrome is used to assure the correct function of thrust reversers, landing gear, rudder and aileron actuators, propulsion systems, and other flight and landing critical components.

If any members of the CARB board are traveling over the holidays, you are only able to do so because the aviation industry has used hexavalent chromium in California to keep you safe.

Hard chrome platers support manufacturing, processing, repair and maintenance of critical aircraft components. We follow the explicit direction of engineers within the OEMs and the airlines, and use federal and internationally recognized standards to perform the work. In the United States, the design, production, and maintenance of all aircraft are under the jurisdiction of the FAA who audit and enforce the strict adherence to the requirements. Those requirements dictate the use of hexavalent chrome. People go to jail and/or are fined if regulations are not followed.

The United States aviation infrastructure is interstate commerce. Aircraft repair and maintenance is a necessary part of that infrastructure. The CARB does not have authority to regulate interstate commerce.

Despite formal efforts by the US government and the aviation community to identify a hard chrome alternative in the late 90's, the industry has not yet found suitable alternatives. This ATCM is not going to change the realities of physics, materials, etc.. Your flight is only able to occur because hexavalent chromium makes it safe and possible.

Even the newest Boeing 787 aircraft which will be manufactured for the foreseeable future and will fly for decades are designed to be made and maintained with hexavalent chrome. Every aircraft in the world contains a part that was hexavalent chrome plated in California. Aircraft have usable lives spanning decades and will persist beyond 2039. The California economy depends on tourism. A hard chrome ban is misguided hypocrisy.

Enjoy your flight.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-22 08:56:05

No Duplicates.

**Comment 22 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jerry  
Last Name: Redding  
Email Address: jerryredding55@yahoo.com  
Affiliation: Sherman custom plating

Subject: Hexavalent chrome  
Comment:

Hexavalent chrome I work at Sherms custom plating in Sacramento California my dad started this company 50 years ago we have always abided by the rules and put in all of the safety equipment air scrubbers etc. by eliminating hexavalent chrome all of our or most of our client base will just simply go out of state to get their work done we are a small shop in Sacramento California I don't think it's fair that the hard chroming industry gets 10 years allowance to go about business in a normal manner whereas decorative chrome players only have four years before rulings are made I don't think that's fair our emissions are zero detectable because we use air scrubbers on the chromium bath please reconsider these unfair rulings on the Hexavalent chrome.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-22 19:40:32

No Duplicates.

**Comment 23 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Changes / Comment Period  
Comment:

I have provided input that there are discrepancies and errors in and between the ISOR, the SRIA, and the proposed rule. I request that those documents be updated to correct the discrepancies and logic failures (e.g... annual emission reduction being greater than annual emissions, rule motivation attributed to environmental justice concerns but unsupported by documented AB 617 CERPs in the EJ communities, and more...). To the extent the rule might be changed to address the comments of myself and others, I request that the public be given 45 days to analyze the changes and provide comment. This is reasonable considering that individual members of the public and owner/managers of small businesses do not have sufficient time and resources as do large corporations and the State of California to devote to analyzing the rule.

This rule making is an excellent example of the difficulty that small businesses have in working with California regulators.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-28 13:45:42

No Duplicates.



## **Comment 24 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Bobbi

Last Name: Burns

Email Address: bobbiburns@sbcglobal.net

Affiliation:

Subject: Amendment to Chrome ATCM

Comment:

For those reading public comments that may not be aware, Hexavalent Chromium can be found in many places in our everyday lives. Besides nature and plating shops, Hexavalent Chromium is found within industries of aerospace, ground transportation, concrete, welding, leather tanning, wood preserving, fireworks (there goes Disneyland), cosmetics, cleaning agents and tobacco. Some everyday items include products in our home like electronics, fixtures, hardware, furniture and keys. The Chromium finishes are essential to automobiles including electric cars, aerospace, industrial machinery, dies and molds; metal finishing adds a variety of protection, wear resistance, and in some cases restoration.

Permits, inspections, testing and fees are the standard for any Chromium plating facility in California. Regulations here in California are the most stringent in the USA. California sets the standard and is the leader of environmental innovations in the Country. The proposed ban on Decorative Chrome in the upcoming amendment to the ATCM simply doesn't make sense. Banning the Decorative Chrome process here does not make the demand for the finish go away. There are countless manufacturing and restoration companies here in this State that will have to close or ship parts to other States, other States that have little to no control on the process, creating a new wave of problems. The technology used today to prevent pollution is superior to what was used decades ago.

"In 2007, to further protect the public, CARB adopted additional amendments to the Chrome Plating ATCM, resulting in the most stringent and health protective emission standards applicable to chrome plating operations in the nation." This sentence was plucked straight from CARB's website.

Since 2007 there has been a significant reduction in CrVI emissions from plating facilities. We account for less than 1% of the total CrVI emissions in the entire State. My point is that we are not a failed regulated industry. The proposed amendment should create an emission base rule for all covered process equally. The Decorative, Functional and Chromic Acid Anodize have the same chemistry so why ban just one? The amendment should be an emission based rule for any hexavalent chromium process. The Decorative Chrome process averages 10k to 40K amp-hrs annually but the Hard or Functional Chrome and Chromic Acid Anodize process can run-up to and over a million amp-hrs annually. It is discrimination.

Proposing alternatives such as Tri-Chrome for decorative finishes should be an alternative, not the only choice. If a Decorative Chrome facility is meeting the emission standard, under the threshold or non-detect for CrVI emissions then why shut it down? The ATCM Amendment should be based on science and data, not emotions. Imposing a discriminatory ban on this process sets a bad precedent for California.

I strongly urge CARB to stand by the side of California businesses that have maintained compliance and continue to invest in better technologies so that we can continue our craft and be of service to not only the large manufacturers but the hobbyist and enthusiasts that rely on our finishes. The stationary source of this hexavalent chromium is under control of not only the Operators, who are certified by CARB's program but also by the local Air Districts. I am a second generation metal finisher for over thirty years. I am in good health. My long-time employees are in good health. If I thought I was endangering my family or community we wouldn't be in business. Thank you for reading my comments.

Biological fun facts: Ingested Cr(VI) is efficiently reduced to the Cr(III) by the gastric juices [De Flora, Badolati et al. 1987]. Cr(VI) can also be reduced to the Cr(III) in the epithelial lining fluid of the lungs by ascorbate and glutathione (Petrilli, Rossi et al. 1986; Suzuki and Fukuda 1990). Once absorbed into the bloodstream, Cr(VI) is rapidly taken up by erythrocytes after absorption and reduced to Cr(III) inside the red blood cells. In contrast, Cr(III) does not readily cross red blood cell membranes, but binds directly to transferrin, an iron-transporting protein in the plasma (made by the liver) EPA 1998; ATSDR 2000; Dayan and Paine 2001].

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-29 13:13:44

No Duplicates.

**Comment 25 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Art  
Last Name: Holman  
Email Address: art@sherm splating.com  
Affiliation: Sherm's Custom Plating

Subject: 2022 Chrome emissions  
Comment:

I would like for the board to look at decorative platers emissions and clearly state why we are being targeted for elimination in California when we are already highly regulated and have zero threat to public safety when operating under current ATCM.

I will publicly post my emissions for the 2022 year with data to prove that shops like mine are not the problem and should not be required to transition to trivalent or close down operations.

2022 I used 31,322 amp/hrs at a source test rating of 0.00032  
The math is  $31,322 \times 0.00032 = 10.02304$  milligrams for all of 2022.

To put this in perspective a paperclip = 1 gram.

It would take my facility 100 years at these rates to produce 1 gram of chrome, a paperclip worth! Can you see how ridiculous this is? you have the ability to look at true data on emissions in the industry and the facts speak for themselves.

Before any decision on a new ATCM is reached the board really needs to look at facts, the overwhelming majority of platers all have amp/hr meters and source test documentation that proves the chrome plating industry as a whole is not the problem with hexavalent chrome emissions.

Ships, Rail, Concrete, and mobile sources are huge contributors, and this new rule will do nothing to change that it will only drive chrome platers out of state where they are not regulated as tightly as here in California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-30 07:03:25

No Duplicates.



**Comment 26 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Paramount (Dichromate Seal Tanks)  
Comment:

Air monitoring in Paramount revealed that dichromate seal tanks were a source of hex chrome and that CARB and AQMD had NO RULE to control dichromate seal tanks! The tanks were unregulated. An uproar ensued. CARB and AQMD came under fire. How could they let this happen? Blame had to be assessed. Round up the usual suspects...chrome platers! A new rule was made. Media headlines blamed platers but the firms with dichromate seal tanks were NOT decorative chrome platers and were NOT hard chrome platers. CARB's allegations about fugitive plating emissions from "uncontrolled tanks" are based on this situation in Paramount and on another in Newport Beach. But, again, the Newport Beach firm is NOT a decorative chrome and NOT a hard chrome plater either. So why does this rule target decorative and hard chrome plating? Why does it justify action based on "fugitive plating emissions from uncontrolled tanks" when hard and decorative platers don't have dichromate seal tanks? How did CARB draw a line from Dichromate seal tanks to hard chrome and decorative chrome platers?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-12-30 12:22:49

No Duplicates.

**Comment 27 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Rich  
Last Name: Roberson  
Email Address: richroberson@outlook.com  
Affiliation:

Subject: CARB Chrome Plating ATCM  
Comment:

Re: CARB Chrome Plating ATCM

Eugene,  
I would like to express concern of a complete ban of Hexavalent Hard Chrome plating on behalf of our Team members here at Roll Technology West (RTW).  
Our Team members invested time into their profession and have made it not just a job, but a career.  
Our team members are puzzled why the career they chose, is being targeted for a complete ban. They are bewildered why an industry that makes up less than 1% of hex chromium emissions nationally, is being targeted for elimination.  
RTW's Team members have always done the right thing and followed all the rules, procedures, and permits.  
"And we must recognize that communities of color have a range of views and concerns. "-CARB Chair Randolph  
RTW's team members have children and grandchildren who are all are part of a community of color. They work in this community. They have homes in this community.  
"We cannot fail in our efforts to listen, engage, and work towards equitable solutions as best we can. "-Chair Randolph  
The complete ban of Hexavalent chrome plating is the exact opposite of equitable solution. There is no alternative for the Hexavalent Hard chrome plating of Work rolls.  
Our team members would be laid off and because their career is banned, the skills, which they have worked so hard to hone, would be worthless.  
This would be traumatic for our Team members, families, and community.

I understand CARB's quest to look for an alternative to Hexavalent Hard chrome plating. However, there is no viable alternative for the Hexavalent Chrome plating of Work rolls.  
Therefore, I ask CARB not to institute a complete ban on Hexavalent Hard chrome but rather, consider a more equitable solution and adopt the European model and grant conditional exemptions until a viable and proven alternative is found.  
If granted, a conditional exemption would give RTW the ability to remain in operation until a viable and proven alternative is found.

Sincerely,

Richard Roberson

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-04 14:48:12

No Duplicates.

**Comment 28 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: JIM

Last Name: MEYER

Email Address: jmeyer@aviation-repair.com

Affiliation:

Subject: Atmospheric Rivers and Hex Chrome

Comment:

We are currently experiencing an "atmospheric river" event (as the press likes to call it) that is predicted to result in downed trees and power lines, flooding, and mudslides throughout the state. I don't know if that prediction will hold, as weather can be unpredictable, but I do know this...

The hydraulic actuation mechanisms on the bulldozers, earthmovers, and backhoes that will clear the roads, restore your power, repair the dams, and reinforce the hillsides are MANUFACTURED AND REPAIRED with HEXAVALENT CHROME by hard chrome platers. Your decision will have consequences. Please don't be naive about what protects you, your property, and the citizens of California and allows the taxpayers to pay your salaries.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-05 06:47:36

No Duplicates.



**Comment 29 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Kelly  
Last Name: Wiley  
Email Address: Kcwiley5@gmail.com  
Affiliation: Sherm's Custom Plating

Subject: Chrome Ban in California  
Comment:

My name is Kelly Wiley. I have worked for Sherm's Custom Plating in Sacramento, Ca for 16 years. That is a majority of my working life. I am a single women, who owns her own home (thanks in part to my employment at Sherm's), and is on track to be a part of the ownership group at Sherm's. I would be a female owner in a male driven industry. This has been the goal for the last 10 years. If Sherm's is forced to stop doing hex chrome plating we will loose our customer base, thereby shutting us down. I would be a middle aged women looking for employment whose skills and knowledge base lay mostly in the chrome plating industry. Sherm's has always maintained a clean facility and followed all of the guidelines set in place by different regulatory groups. Please give us the opportunity to adhere to guidelines rather than banning chrome all together. My future and that of the people I work with, are depending on you. Thank you for your time.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-05 09:00:59

No Duplicates.

## **Comment 30 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Technology Reviews are undefined and vaguely timed  
Comment:

The proposed rule establishes the timing of two "technology reviews" which will be used to determine when and whether functional and hard chrome platers should be eliminated earlier than 2039.

The rule includes no definition of "technology review". It should be obvious this is a problem.

The rule states only that the first technology review must be "complete...by January 1, 2032." Therefore, the first technology review could occur in 2023 and the rule would be met. Hard chrome platers and anodize facilities could be eliminated before decorative per this rule.

There is no basis for any business to invest capital (or stay) in California if CARB can eliminate them by performing an undefined process, maybe tomorrow, or maybe sometime in the next ten years. What is a reasonable person (and business, and concerned citizen, and etc.) to conclude? Is this how CARB writes rules now? After more than three years of effort?

The only thing we can know about CARB's intended "technology review" is what we see has occurred with respect to the decorative chrome platers and the review of trivalent chrome plating technology. What was the venue in which this occurred? Who organized and conducted the review? Who was asked to participate in the review? How much diversity of opinion was allowed in the process and how was it dealt with to reach conclusions? How did CARB assess the needs of customers in the marketplace? Were decorative platers involved in the review? Who advocated that trivalent chrome was an acceptable substitute? When, how, and who made the decision that "trivalent chrome" could substitute? Do CARB, CARB staff, CARB board members have any economic interest in research or firms associated with trivalent chrome technology? So many unanswered questions.

The proposed undefined and vaguely timed "technology reviews" are unacceptable.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-06 07:29:57

No Duplicates.

**Comment 31 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: John  
Last Name: Romero  
Email Address: chromer9@sbcglobal.net  
Affiliation: west coast chrome

Subject: the myth  
Comment:

There are over 500 substances that are probable carcinogens including auto exhaust, cigarettes, processed meats etc. basically what they are saying is that hex chrome causes cancer along with all those other items, this really is a myth, has it been proven to be a carcinogen, a carcinogen is a substance that causes cancer, I have been in business for 30 years. All those years I have never heard of anyone dying or even becoming ill from chrome. I have been doing all my chrome plating myself and yet I am still here and in good health. I am small 2 man shop not a threat to human health in any way and have proof of it. recently the epa conducted a site investigation on my shop. I spent an enormous amount of money on lawyer fees geologist fees etc. They took soil samples septic tank samples cameras through the plumbing. In the end the test results came back (nd) non detected for chrome, nickel, copper or any other hazardous material. Therefore my shop is not a threat to public health, furthermore I am one of the smallest shops in California, I am only allowed 66 amp hrs per day, but only do about 20 per day, mostly small parts. With that being said how can my shop be a threat to anyone. If they do pass this law, I can't see how these businesses will survive. The sad thing is probably about 90 percent workers and/or owners are hispanic such as myself. that have been doing this for a very long time. thank you for your time

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-07 21:12:46

No Duplicates.

**Comment 32 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Why has CARB stopped updating Hex Chrome Statistics?  
Comment:

Any discussion about hex chrome rules should be based on data and that data should be made available to the public in a transparent and accurate manner.

CARB has posted data about Hex Chrome at their own website here: (<https://www.arb.ca.gov/adam/toxics/statepages/cr6state.html>). Thank you CARB. The data include helpful computations for MEAN levels of hex chrome and ESTIMATED RISK of hex chrome statewide since 1991. Please note the improvements made over that time. For reasons which are not clear to this reader, CARB has stopped supplying the MEANS and the ESTIMATED RISKS since the beginning of this rulemaking. I could guess that this is because some months do not contain data but this is curious given the higher number of observations shown. Even more baffling is the lack of data observations shown in the second half of 2022. Why would CARB stop sharing data with the public concurrent with this rule making and leading up to a CARB board decision? Coincidence? It is hard to see this as coincidence and it is especially troubling when we have also learned from CARB that the data in appendix B is not correct. Why is data about hex chrome emissions less available and less reliable just as the CARB board and the public and the impacted parties are approaching decision?

Um... We deserve answers.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-09 15:13:52

No Duplicates.

## **Comment 33 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Less than 2 Hex Chrome Cancer Cases in California (Annually)  
Comment:

It would be nice if there were a reliable source of data from which to perform these calculations. See my previous comment(s).

But using the data we have...

The California population is around 40 million. So using the most recent CARB data that show a cancer case rate attributable to hex chrome of 16 per million, that computes to 640 cancer cases from hex chrome annually statewide. See my source here - <https://www.arb.ca.gov/adam/toxics/statepages/cr6state.html>

How many of those are from chrome platers?

CARB's Appendix B states chrome platers emit 0.90 pounds of hex chrome annually. SC AQMD states that there are 0.8 pounds per day of Hex chrome emissions in the South Coast basin (see data in SC AQMD MATES V Table 3-4) from all sources. That computes to 292 pounds annually ( $0.8 \times 365 = 292$ ). So in the South Coast area chrome platers make up 0.3% ( $0.9 / 292 = 0.0031$ ) of the hex chrome emissions in the area that everyone would agree contains the highest percentage of chrome platers in the state.

So, since chrome platers make up 0.3% of emissions we can compute the cancer cases attributable to chrome platers as 1.98 cases per year.

**1.98 CANCER CASES PER YEAR IN CALIFORNIA FROM HEX CHROME  
ATTRIBUTABLE TO THE ENTIRE CHROME PLATING INDUSTRY!!**

Who is in control of CARB? What is the agenda? Setting priorities is one of the most basic functions of management. CARB has spent three years on this rule making.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-09 16:04:38

No Duplicates.



**Comment 34 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Thomas  
Last Name: Mulhall  
Email Address: bayareashopsol@gmail.com  
Affiliation: Bay Area Shop Solutions

Subject: Killing Chrome=Killing Jobs  
Comment:

Another attack on the automotive restoration and repair industry is your latest brain child: Going after the hex chrome platers. That industry represents less than 1% of the total Chrome VI emissions for the entire State of Ca. This industry is absolutely vital to the automotive manufacturing, repair, and restoration industries. The last thing that Ca needs is more job killing bureaucrats who worship the almighty carbon lie. Attached is a chart that clearly shows the carbon levels being significantly higher throughout history, BEFORE the advent of the automobile! To kill off another industry like chrome plating is utter madness. There is no reason, other than self-perpetuating legislation, and the vindictive nature towards automobiles that CARB has demonstrated, to kill off the chrome plating industry. We haven't forgotten about the killing off of good paint and brake cleaner that you pencil pushers did to use! San Francisco used to have 3 marvelous platers. One in particular, B&M, was so good that chrome parts that were plated in 1965 are still on some show vehicles today! Now, everyone in the Bay Area has to travel to Sacramento to get good chrome plating. How many useless miles are traveled, and time, fuel, bridge tolls, etc expended all because CARB shut down the platers in SF? Not very environmentally conscious, is that? Cut it out and go after the real polluters, like the thousands of illegal aliens who litter our state with filth.  
Thank you

Attachment: 'www.arb.ca.gov/lists/com-attach/41-chromeatcm2023-VDcFYgBzBTRSO1A+.jpg'

Original File Name: carbon1jpg.jpg

Date and Time Comment Was Submitted: 2023-01-09 23:22:33

No Duplicates.



## **Comment 35 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Zain  
Last Name: Yahya  
Email Address: zainyahya@gmail.com  
Affiliation:

Subject: ATCM for hex chrome  
Comment:

I am still trying to understand the basis for this ruling. If the goal is protect the public health then why are we instituting a ban on this process as opposed to regulating it. The industry accounts for less than 1% of hex chrome emissions in the state. Why not target a larger chunk of the pie. Also, when the industry welcomes regulation and says we can get that number down even further. Why would CARB choose a ban rather than working with industry and helping to reduce those emissions.

Businesses will be forced to close, thousands of jobs will be lost, supply chains and consumers will have to find sources outside of the State of California(this impact cannot be overstated). Other States that do not have the regulations and controls that California shops have in place.

The three finishes of Decorative, Functional Chrome Metal Finishing and Chromic Acid Anodizing represent less than 1% of total ChromeVI Emissions for the entire State of California. Why does this warrant a ban?

Fun Fact: Based on the reported annual emissions CARB provided (2018-2019) all of the decorative chrome platers in the state emitted less hexavalent chromium at .00856 lbs per year than the popular theme park resort in Anaheim at 0.106 lbs per year.

Please reconsider this draconian rule that continues to be illogical given the stated goals of CARB.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-11 13:13:07

No Duplicates.

**Comment 36 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Aaron  
Last Name: Plechaty  
Email Address: aplechaty@electro-coatings.com  
Affiliation:

Subject: Banning is not the answer...

Comment:

I have worked at/around a chrome plating shop for 26 years, you are looking to take the quick and easy road and just kill off an industry. The industry has stated time, and time again that we are willing and able to discuss and work through tighter regulations and rules. This is the ideal way forward.

The complete ban on chrome plating in any time frame is not practical. We as an industry produce less than 1% of all hex chrome emissions, who/what/where are the 99%? What are you doing about limiting the excess emissions from all the bigger places and companies and names? By attacking the smallest group, you will be shutting down small businesses in the state, and forcing jobs out of state - because people will not suddenly stop wanting chrome, they will just have to get it from other places (who most likely have lesser emissions standards and thus affect even more people).

Please consider pushing back any rules or voting, unless all the research is complete, until the actual facts are verified and we can all move forward together and not leave thousands of people without jobs.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-12 08:05:48

No Duplicates.

**Comment 37 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: steve

Last Name: Weeks

Email Address: steveweeks900@gmail.com

Affiliation:

Subject: chromeatcm2023

Comment:

I have been made aware of this proposed ban. I am not in favor. California is recognized as almost the birthplace of auto customization. Chrome plating is an extremely minor part of our emissions. There must be other options other than a complete ban. This is one more reason to be ridiculed by other states and part of the bigger picture why so many people are leaving this once great state. The elitist attitude that as California goes so should the country is doing us harm in many ways. Please reconsider.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-12 10:00:26

No Duplicates.

**Comment 38 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Matthew

Last Name: Pankow

Email Address: mattp@platinginternational.com

Affiliation: Plating Internatioanl Inc.

Subject: Chromium

Comment:

The current standards in place have dramatically reduced emissions in regard to Chrome Plating and Anodizing and I don't see how an amendment in justified. An amendment would negatively impact the industry, local manufacturers and move more business to other countries around the world.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-13 10:38:08

No Duplicates.

**Comment 39 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: HEPA Filtration not BACT anymore?  
Comment:

This ATCM imposes a ban on hex chrome use for hard chrome plating even though there is not an alternative. Since the ban is imposed even though hard chrome platers do use state of the art HEPA filtration systems, CARB is establishing a precedent that HEPA filtration systems are inadequate for management of carcinogens. This has major implications for not only hex chrome, but for nearly all the other air toxics in California. CARB would be saying that HEPA filtration is no longer the Best Available Control Technology. A ban would now be the best available control technology.

But HEPA filters are effective for control of hex chrome as evidenced by all the other CARB and district rules which require use of HEPA enclosures and booths and which have not been proposed to be revised. There is a long list.

Is it CARB's strategy to start with platers to eliminate HEPA filtration as a control method? Are they using us as some sort of Machiavellian example to everyone else. Cull out all the small business platers, win a key case, and then move on to the bigger polluters that make up 99% of the hex chrome problem. Hmmm, very shrewd.

It would be false for CARB to state that the ban is necessary due to fugitive (non-HEPA) emissions since CARB has not measured fugitives (or admitted to doing so) at hard chrome platers. Fugitive emissions observed in Paramount and Newport Beach were not from hard chrome plating.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-13 10:36:22

No Duplicates.

**Comment 40 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: James  
Last Name: Goehring  
Email Address: jrgjrgus@outlook.com  
Affiliation: Manager

Subject: Proposed ATCM amendments  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/47-chromeatcm2023-AHNTAHNTNwB4VIAdqM0d.pdf'

Original File Name: ltr for public comment - CARB.pdf

Date and Time Comment Was Submitted: 2023-01-14 12:01:20

No Duplicates.

## **Comment 41 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Rule Purpose according to the SRIA  
Comment:

The opening paragraph of the SRIA sets forth the purpose for the rulemaking. It is artfully crafted, but misleads the CARB board and the people of California.

It states "The electrolytic processes associated with plating operations cause mists containing hexavalent chromium to be released from plating tanks, which are eventually emitted into outdoor air through building openings and vents. Despite control systems installed at chrome plating facilities, hexavalent chromium emissions continue to be released from facilities into the surrounding environment and communities. Fugitive emissions occur because the control systems do not capture 100 percent of the emissions from these facilities. Many of these facilities are located close to sensitive receptors (e.g., schools, residential care facilities, and homes where children and elderly reside), and are also located in disadvantaged communities."

Let's look at how misleading that paragraph is and how it is being misapplied by CARB.

"The electrolytic processes associated with plating operations cause mists containing hexavalent chromium to be released from plating tanks, which are eventually emitted into outdoor air through building openings and vents". This statement is NOT factually correct at hard chrome plating facilities with emission control systems. At hard chrome plating facilities, 100% of hard chrome plating tank mists are captured by the push pull headers of the emission control systems and directed into HEPA filters which at 99.97% efficiency reduce the pollutants to nearly nothing, This is confirmed by regulatorily required source testing. CARB knows this and SCAQMD knows this. But the writer needs to setup an argument about fugitive emissions and they need the reader to believe that mists are created and flying around in the air. They also want the reader to believe these emissions are coming from plating tanks and not from rinse or other associated tanks (for example, dichromate seal tanks) - which is a VERY important distinction. It takes a stretch of logic to call a dichromate seal tank a "plating tank" but that is what the writer does. Let's look at the next sentence.

"Despite control systems installed at chrome plating facilities, hexavalent chromium emissions continue to be released from facilities into the surrounding environment and communities." CARB

may have reasons for being vague with this statement but it is highly misleading. It is a diplomatic allusion to joint failures of the regulatory community) and the management practices at unnamed facilities in Southern California. CARB may not want to be specific about the facilities but a review of media reports lead to identification of Anaplex in Paramount and Hixson Metal Finishing in Newport Beach. If there are others, CARB has not identified them or the situations to which they allude. So there is no way to comment on them. For the record, it is very important to recognize that Anaplex is NOT a hard chrome plater and Hixson Metal Finishing is NOT a hard chrome plater. Neither of these firms had hard chrome plating tanks with HEPA emission control systems. The sentence is constructed artfully. It wants the reader to believe the facilities had emission controls. The truth? The facilities DID have emission controls, but certain tanks did not. As a result, there were releases into surrounding communities. CARB and SCAQMD should disclose to the public in a straight-forward way that the regulators did not require emission control systems on those dichromate seal tanks. CARB may have other data from which they can support their contention of fugitive emissions but the lack of specificity and quantification is notable.

"Fugitive emissions occur because the control systems do not capture 100 percent of the emissions from these facilities." This is an artfully worded, factually true statement that implies equality between hard chrome plating tanks with HEPA systems capturing 99.97% of hex chrome, and to un-controlled dichromate tanks which happen to be located in a facility with controls. There is no distinction made about the level of fugitive emissions from the two vastly different facilities. It is used in this purpose paragraph to justify a sledgehammer approach which will be used to eliminate all chrome plating.

"Many of these facilities are located close to sensitive receptors (e.g., schools, residential care facilities, and homes where children and elderly reside), and are also located in disadvantaged communities." This is a true statement. The sentence could have said "Many of these facilities are located close to sensitive receptors and many are NOT located close to sensitive receptors." That is also a true statement but it does not serve the writer's cause to say it that way. The writer continues, "Some...are also located in disadvantaged communities". True. But, unsaid, some are NOT located in disadvantaged communities. Our facility is located in a community that is not scored by CalEnviroScreen because there is no residential population. Hixson Metal Finishing is located in a community with a 65th percentile score on CalEnviroScreen. Most readers will not perceive Newport Beach as a disadvantaged community.

The misleading purpose statement contained in the SRIA creates a decision environment for the CARB board which, in my opinion, creates a potential legal liability for the CARB and the State of California. The purpose as stated in the ISOR does not match the purpose in the SRIA. Further, since the rule would eliminate infrastructure that supports the largest industries in the state (Tourism, Agriculture, Automotive, Aerospace) some serious restructuring of this ATCM must be done. It is obviously unfair to hard chrome platers who have invested in HEPA systems and are compliant with the SCAQMD rules. It is unfair to California workers at impacted facilities and at links in the supply chains which are supported by hexavalent hard chrome platers. Please reconsider your approach to this rule-making.



Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-15 07:25:31

No Duplicates.

## **Comment 42 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: ATCM & SRIA Technology Assumptions Invalid  
Comment:

The CARB ATCM SRIA estimates a benefit of 10 pounds of hex chrome per year. 86% of that benefit is derived from the impact of the ATCM on hard chrome platers. Yet, the ATCM does not identify any technology which is capable of replacing hard hex chrome plating. A technology is imagined for the purpose of cost and benefit estimation in the SRIA.

We are able to determine from the SRIA that the attributes of the imagined hard chrome plating technology are as follows:

Emissions - None  
Implementation Cost - \$4 Million per facility  
Method of applying the technology - undefined  
On-going operational cost - Same as current technology  
On-going operational process time - Same as current technology  
Effectiveness of technology attributes - Same as current technology (with no analysis of hardness, lubricity, coefficient of friction, wear resistance, corrosion, porosity, method of application, etc..)  
Technology adoption rate - immediate at implementation of the new technology  
Technology adoption scope - all applications simultaneously

Technology development as it relates to hard chrome alternatives has been ongoing for more than 25 years and is well understood. The assumptions above are NOT consistent with the most likely technological development path for a hard chrome alternative in the future. The most likely technology development path will not have a binary yes/no ability to change technological attributes (named above) all at once across all applications.

This SRIA completely fails to recognize how technology change occurs and is implemented, yet it allows CARB to take credit for 86% of a benefit without associated recognition of cost.

There is no analysis of the costs to other supply chain participants (manufacturers, maintainers, etc...) from changing to the imagined technology in the this SRIA.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-15 07:39:23

No Duplicates.

**Comment 43 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: US Federal Law is superior to California Law  
Comment:

Aviation Repair Solutions, Inc. repairs commercial aircraft parts as a participant in interstate commerce and under the purview of the Federal Department of Transportation Federal Aviation Administration. As such, we are legally required by federal law to perform our work in concert with FAA regulation. FAA regulation requires us to repair parts in compliance with FAA approved repairs. FAA approved repairs require us to use hexavalent chrome plating. If we do not use hexavalent chrome plating we are in conflict with federal law.

The proposed CARB ATCM violates the commerce clause and supremacy clauses of the United States Constitution.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-15 09:27:45

No Duplicates.

**Comment 44 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Kyle

Last Name: Cassano

Email Address: kylecassano@mac.com

Affiliation:

Subject: Do NOT ban hex chrome plating in CA

Comment:

California is the most regulated state in the country for chrome plating, which makes it the safest and most responsible state in the country to perform chrome plating.

This ban is not based on science... it will harm businesses and your constituents. Reconsider... do not ban.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-15 16:44:46

No Duplicates.

**Comment 45 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Luke

Last Name: Kidd

Email Address: motorsatan@gmail.com

Affiliation:

Subject: ban the mouse

Comment:

According to your own CARB reporting for 2018/2019 a single Anaheim theme park produced more hexavalent chromium than all California chrome shops combined. Why are you not passing laws to shut down the monster which is Disney Land? Going after small business all across the state only hurts our citizens, the ones you are elected to serve. Please rethink what you are proposing and do the right thing.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-16 11:59:26

No Duplicates.

**Comment 46 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Cathy  
Last Name: Ream  
Email Address: cream@teikuro.com  
Affiliation: Teikuro Corporation

Subject: Chrome Ban  
Comment:

It is not possible to put a timeline on banning hexavalent chromium because there is not a "one size fits all" solution to replacing hexavalent chromium coatings as the function and properties needed can be different for different products. Sometimes, it can even be impossible.

I have not worked with trivalent chromium but I understand that the color is different than hexavalent chrome, usually a whitish color. Do you think consumers want "white" bumpers and chrome trim on their automobiles and restored automobiles? Do they want a white kitchen faucet?

Chromium electroplaters and anodizers in California have spent hundreds of thousands of dollars, if not millions of dollars, to meet the current low emissions regulations for hex chrome. Of these companies, some are large and some are small. Some would survive a hex chrome ban, but many, especially the smaller ones that only work with chromium, would not. What happens to the owners when they have to walk away from the money that they already have invested?

I have worked in the metal finishing business for over 40 years, chromic anodizing in the past and the majority of my career and most recently with hexavalent chrome industrial electroplating, so I am speaking about electroplating in that it is a unique process and the operators have a unique and special skill. Many have spent the majority of their careers in this business and are facing the possibility of losing their jobs if the ban is enacted. I understand that the industrial chrome ban won't be effective for 17 years, but the decorative chrome ban is much sooner. With these special skills, what kind of employment will they be able to obtain at the ages a lot of them are? Even in 17 years, most probably won't be retirement age yet, so I don't think that you are considering the effect it will have on the workers and their subsequent employment....and the supply chain workers and customers.

The PFOS/PFAS issue is a whole, separate and different issue. PFOS was and PFAS is being used legally. Getting rid of hex chrome should not have as it's goal to get rid of PFAS.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-16 11:41:56

No Duplicates.



**Comment 47 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: matt  
Last Name: theobald  
Email Address: matt.theobald@gmail.com  
Affiliation:

Subject: Chrome and Safe Operation  
Comment:

Please consider the facts regarding going after the decorative chrome plating industry, the impact of moving the business out of the state is just moving the problem.

I work in industries where challenging chemistry is often a problem, I would rather see the business and processes stay in a state where people are motivated to operate and control them safely, rather than have the shipped outside where others may not operate so safely.

The need for decorative chrome will remain, please keep it in a state where there is motivation to operate it safely.

-Matt Theobald

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-16 12:40:34

No Duplicates.

**Comment 48 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Albert  
Last Name: Ybarra Jr.  
Email Address: 805dicos@gmail.com  
Affiliation: Sherms Custom Plating

Subject: Chrome Ban in California  
Comment:

My name is Albert Ybarra Jr. I am a second generation polisher at Sherm's Custom Plating in Sacramento. I starting working at Sherm's right out of high school. I am now 38 years old. I was able to purchase my home when I was 25 years old due to the steady employment and how hard I have worked in my career. I am now the shops foreman and on track to be apart of the ownership group. By taking away chrome not only will you be taking away my job, but my fathers job as well. I pride myself in what I do for the automotive industry and it shows in the quality product our facility puts out. We also take pride in the cleanliness of our facility. Please give us an emissions standard that we can meet and don't ban chrome all together.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-16 13:25:29

No Duplicates.

**Comment 49 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jerry  
Last Name: Desmond  
Email Address: jerry@desmondlobbyfirm.com  
Affiliation: Desmond & Desmond LLC

Subject: CARB CrVI ATCM Update  
Comment:

Comments of the Metal Finishing Association of Northern California, Metal Finishing Association of Southern California, and National Association for Surface Finishing.

Attachment: 'www.arb.ca.gov/lists/com-attach/56-chromeatcm2023-VjUGYQNwBDVXDglq.pdf'

Original File Name: CARB CrVI ATCM Letter 1-16-23.pdf

Date and Time Comment Was Submitted: 2023-01-16 14:56:06

No Duplicates.

**Comment 50 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: CARLO

Last Name: SPARTANO

Email Address: CSPARTANO@COMPLETECOACH.COM

Affiliation: complete coach works

Subject: WE NEED CHROME PLATING

Comment:

THE AMOUNT OF ACTUAL HEX CHROME USED ON OUR PRODUCT LINE IS MINIMAL BUT NECARRY .THE SMALL AMOUNT OF CHROME IS NOT CAUSING HARM TO OUR ENVIRRONMENT LIKE DIESEL FUEL AIRCRAFT FUEL CONCRETE GRINDING AND CUTTING --WE NNEED CHROME PLATING

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-16 15:28:21

No Duplicates.

**Comment 51 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Cathy  
Last Name: Atterman  
Email Address: la\_design@sbcglobal.net  
Affiliation:

Subject: CARB  
Comment:

We have been in the promotional marketing industry as a supplier and manufacturer for more than 25 yrs. We have made plenty of jewelry and other small promotional items doing business with General/Brite Plating in LA County. The amount of Chrome/Hexavalent Chrome use on these products does not represent enough of a percentage to cause any harm airborne or in contact to skin to warrant a ban. There have been enough props and other guidelines placed in this industry that are being followed to protect the people. I have never had a complaint from a client regarding this type of plating. There are very few plating companies left for manufacturers to source out for plating processes, please don't take away more jobs and more small business. There are other more important airborne causing illness like aircraft fuel, diesel fuel to name a couple.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-16 15:29:35

No Duplicates.

**Comment 52 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Janice

Last Name: Stewart

Email Address: janice@henrispecialties.com

Affiliation:

Subject: ALLOW Chromium Electroplating and Acid Anodizing Operations

Comment:

This will kill a lot of our business as many hotels want special finishes and this is the only way to give them what they designed and want. We will have to go to China to get this done so there goes more work overseas instead of our own state! SMALL BUSINESS WILL LOSE OUT!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-16 15:47:52

No Duplicates.

**Comment 53 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Angelica  
Last Name: Vargas  
Email Address: Angelicavrda@gmail.com  
Affiliation:

Subject: Keep Chrome in California  
Comment:

Hello my name is Angelica Vargas,  
I'm writing this petition to aid in the support to keep the chrome industry. My husband has been an employee of Sherms Custom Plating for 20 plus years along with 12 others who are Fathers, Husbands, Grandfathers and the main household providers for their families. My husband has been able to give it his all, working long hours in something that not only makes a living doing but also is his passion. This career has given us a future to continue to own our own home, send our children to college and continue to live in the state of California. Thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-16 17:22:07

No Duplicates.

**Comment 54 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: David

Last Name: Martinez

Email Address: Davidamartinez77@gmail.com

Affiliation:

Subject: Chrome plating

Comment:

I have never seen a more regulated industry than that of the plating industry. And it's not just for the automotive industry. It's also for the art industry and home decor industry. Banning this type of industry is just going to drive out more of the fleeing citizens out of California. And another historical industry gone.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-16 18:03:26

No Duplicates.



**Comment 55 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Randall  
Last Name: Eldridge  
Email Address: randy@ldlgc.com  
Affiliation: General Contracting

Subject: User of Chrome Plated Products- Do Not Ban  
Comment:

Please sirs, I urge you to consider how much actual base materials are used for this type of plating--not much. I would ask that you turn to look and spend more time and resources on larger use products/particulates that are harmful but in large scale such are diesel fuel waste, spills and mishandling and also dust particulate in out air from concrete cutting etc.

Thank you in advance,  
Randall Eldridge

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-16 18:17:02

No Duplicates.

**Comment 56 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Chris  
Last Name: Scarano  
Email Address: chris@leferforge.com  
Affiliation:

Subject: Please  
Comment:

Please consider that the amount of actual Hex chrome used on our product line is minimal but necessary. The small amount of chrome is not causing harm to our environment like diesel fuel, aircraft fuel and Concrete cutting and grinding. Thank you!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-16 19:32:01

No Duplicates.

**Comment 57 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Source Test Frequency  
Comment:

The requirement to source test pollution control systems every two years is unnecessary and extremely costly. It is unnecessary because ongoing compliance with Rule 1469 requires ongoing monitoring of control system parameters such as pressure drops and slot velocities and documented maintenance practices. District enforcement of these rule elements assures there is not a need for source testing frequency greater than every ten years. CARB's requirement to test every two years is unreasonable.

If there is data that supports the need for testing frequency less than 10 years, CARB should present it. Even the current SC AQMD requirement is too frequent.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 07:52:12

No Duplicates.

**Comment 58 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Rebecca

Last Name: Overmyer-Velazquez

Email Address: rebecca@cleanaircoalition.org

Affiliation: Clean Air Coalition of North Whittier an

Subject: Switch to trivalent chromium!

Comment:

I ask that you finally take action to end the practice of boiling highly toxic metals near the places our children attend school, near our churches, near our local business, and next to the neighborhoods where we live, work, play, and pray. Over half the chrome platers in California are near a school, church, or neighborhood.

Switching to trivalent chromium has the benefit of not only significantly reducing the toxic emissions of one of the most dangerous chemicals known into our communities, but facilities using trivalent chromium avoid having to use toxic PFAS-based fume suppressants as well.

Please take this important action in the Chrome Plating ATCM now, to gain early reductions in the many communities affected by the decorative chrome platers, and to commit to early action to switch both the anodizer and hard chrome platers away from hexavalent chromium as soon as feasible alternatives can be identified.

Thank you for your commitment to protecting the health and well-being of our most impacted communities and your continued public service.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 08:32:29

No Duplicates.

**Comment 59 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: James  
Last Name: Simonelli  
Email Address: james@metalscoalition.com  
Affiliation: California Metals Coalition

Subject: Comments on ATCM (California Metals Coalition)  
Comment:

Thank you for allowing us to provide comments. James

Attachment: 'www.arb.ca.gov/lists/com-attach/66-chromeatcm2023-R3VdKwNwBDhWMm0D.pdf'

Original File Name: CMC\_Comments\_Jan2023\_CARB\_ATCM\_Cr6.pdf

Date and Time Comment Was Submitted: 2023-01-17 11:36:14

No Duplicates.

**Comment 60 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Evette  
Last Name: Holman  
Email Address: evettebeckwith@yahoo.com  
Affiliation:

Subject: Chrome  
Comment:

I am married to a decorative chrome plater here in California and I don't understand why CARB is unwilling to work with this industry. The regulations are stricter here than any other state. My husband runs a very clean operation in Sacramento, and it is monitored from multiple agencies to protect workers and public health. How are we going to support ourselves not to mention his employees? You can't just move a Chrome plating shop, it takes lots of assets which quite frankly are not available. I would also question if what you are proposing is even legal? how you can ban the smallest users of chrome while allowing larger companies to operate seems unfair. Please reevaluate this rule before it does more damage to jobs in California.  
Thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-16 14:01:45

No Duplicates.

**Comment 61 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: James  
Last Name: Pessy  
Email Address: artdecod@aol.com  
Affiliation: Art Deco Decor inc

Subject: Chrome Plating  
Comment:

Please Note ; We need Chrome plating for a lot of the Lighting Fixtures that we manufacture now and in the future . I understand that there is very little of Chrome actually used . There are lots of other chemicals other companies that are much worse for the environment .  
By James Pessy

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 11:59:56

No Duplicates.

**Comment 62 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Carl  
Last Name: Troncale  
Email Address: carl@caltronplating.com  
Affiliation:

Subject: hex chrome  
Comment:

To: CARB

I'm writing to share my opinion regarding the hexavalent chrome ban. Trivalent chrome does not have all the same properties as hex chrome. Color is one. The sulfate process has a better color, but you don't get the corrosion protection. the chloride process can resemble stainless steel in color. It is very important to our customer base that the color is right. We will lose customers. They will go to Az, Texas and Mexico first. I've already had the conversation with several of them.

I too wanting to protect the environment like everyone else, but this doesn't make sense to me. It seems to me that all were doing is exporting the process to another state or country. We have spent over \$100,00 dollars to control our emissions here and were a small company. I did not mind doing that and it really made a difference. Our Chrome emissions with the use of a Hepa filter are extremely low. I truly believe we will lose half if not more of our customers if this happens. We have been in business 62 years with many employees that have been here 35 to 50 years. Everyone has been health too.

Thank you for your consideration.

Carl Troncale, President

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 12:29:44

No Duplicates.



**Comment 63 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Ray  
Last Name: Lucas  
Email Address: ray@valleychrome.com  
Affiliation: MFANC

Subject: Hex Chrome Ban  
Comment:

Ladies and gentlemen,

There is no good reason to destroy an industry when you have the alternative in rule 1469. I have already switched to Trivalent Chromium for my processes but it took years and hundreds of thousands of dollars. It does work in my case but anyone doing custom restoration work cannot use it. Since our industry contributes far less than 1 % of the emissions in California this rule makes no sense. I think you are kowtowing to the environmental coalitions for no good reason other than it is politically correct. Please do the right thing and change this from a ban to a rule that mirrors Southern Cal rule 1469. Don't kill off this vital industry for no good reason.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 13:11:36

No Duplicates.

**Comment 64 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Albert  
Last Name: Ybarra Sr.  
Email Address: aychrome66@yahoo.com  
Affiliation: Sherms Custom Plating

Subject: Ban on Hex Chrome  
Comment:

My name is Albert Ybarra. I work for Sherm's Custom Plating in Sacramento. I have been in the chrome plating field for 38 years. I love my job. I have a family and grand kids who depending on me. If you decided to close the plating industry down you will be taking a lot of peoples jobs. Please do a little bit more study and research before you try to close down the industry.  
Sincerely,  
Albert Ybarra Sr.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 13:24:49

No Duplicates.

**Comment 65 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Dustin  
Last Name: Berry  
Email Address: dberry@teikuro.com  
Affiliation: Teikuro Corp.

Subject: Chrome plating  
Comment:

Chrome plating is an essential part of manufacturing. Without the benefits of chrome plating and many other "toxic" surface coatings there are a multitude of products whose life would be significantly reduced. The impact of which would have an unmeasurable effect on the environment. The production of raw materials used in the manufacturing of everyday items and the tooling used to make these items would increase dramatically. The idea of banning chrome plating to improve on air quality or for other environmental reasons is completely backwards. Before making such drastic decisions we should look at the direct and indirect consequences they will have. There are far too many industries that rely on surface coatings like chrome plating.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 12:53:36

No Duplicates.

**Comment 66 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Cynthia

Last Name: Babich

Email Address: delamoactioncommittee@gmail.com

Affiliation: Del Amo Action Committee

Subject: Hex Chrome Rule

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/73-chromeatcm2023-WzhWMVUmADELZVcy.pdf'

Original File Name: CARBHexChromeRule12023.pdf

Date and Time Comment Was Submitted: 2023-01-17 14:03:52

No Duplicates.

**Comment 67 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Unemployment is unhealthy and is a Social Justice issue  
Comment:

Closing chrome facilities to move them out of state will cause worse health outcomes due to unemployment than chrome plating causes.

See:

Centers for Disease Control. NIOSH Study Examines Relationship between Employment Status, Healthcare Access, and Health Outcomes  
<https://www.cdc.gov/niosh/updates/upd-11-18-21.html#:~:text=%E2%80%9CEmployment%20is%20a%20social%20determinant,health%20outcomes%2C%E2%80%9D%20said%20Silver.>

National Institute of Health. Job Loss and Health in the U.S. Labor Market  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2831278/>

There is a link between job loss, alcoholism, drug abuse, and homelessness. It impacts people in every community but particularly social justice communities. This CARB rulemaking will worsen conditions in the communities CARB is trying to help.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 14:03:19

No Duplicates.

**Comment 68 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Melissa  
Last Name: Lopez  
Email Address: melissal@royalcustomdesigns.com  
Affiliation: ROYAL CUSTOM DESIGNS

Subject: Chrome Plating  
Comment:

CARB please consider that the amount of actual Hex chrome used on your product line is minimal but necessary. Mention that the small amount of chrome is not causing harm to our environment like diesel fuel, aircraft fuel and Concrete cutting and grinding.  
We need Chrome Plating

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 14:22:45

No Duplicates.

**Comment 69 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Restriction of Permits  
Comment:

My public comments about "ban"s should also be read in the context that any restriction of new and/or changes to permits is equivalent to a "ban".

Changes to hex chrome plating processes made by authorities in the context of FAA approved repairs (e.g...DER, CMM, OHM, AMS, SOPM, etc..) which require the establishment of new tanks, or changes to existing tank chemistries, temperatures, and methods should not be dis-allowed by CARB when the facility has the appropriate controls in place or agrees to put them in place concurrent with the new or changed process. This is an Air Safety issue under the purview of the US Department of Transportation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 15:24:08

No Duplicates.

**Comment 70 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jimena

Last Name: Diaz Leiva

Email Address: jimena@ceh.org

Affiliation: Center for Environmental Health

Subject: re. Proposed Amendments to ATCM for Chromium Plating  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/77-chromeatcm2023-BWZcO1UmBzYGXwZl.pdf'

Original File Name: CARB Comment Letter Hex Chrome 01\_17.pdf

Date and Time Comment Was Submitted: 2023-01-17 16:22:40

No Duplicates.



## **Comment 71 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Anna  
Last Name: Byrd  
Email Address: anna.osr@gmail.com  
Affiliation:

Subject: Support chrome plating  
Comment:

All,  
Recently, the California Air Resources Board proposed new regulations regarding the use of chromium plating in the metal finishing industry. In addition to their already strict environmental ordinances, these new guidelines will phase out hard chrome and chromic acid anodizing in the state of California.

According to the President of the Metal Finishing Associations of Southern California, these regulations will likely cause a severe decline in the California metal finishing industry. They will also require industrial producers to seek chrome plating services out of state. Aerospace and defense, the industrial, medical, automotive, and many other essential industries rely on the chromium plating process. We can't afford to lose industry in California and necessary chrome plating processes can't be replaced. I ask CARB to find the middle ground with the industry

In late April, the California Air Resources Board (CARB) proposed the following deadlines for the implementation of new regulations regarding hexavalent chromium plating:

Dec. 21, 2021 - A halt on the development of any new chromic acid anodizing or hexavalent hard or decorative chromium electroplating facilities  
Jan. 1, 2023 - Final date for all existing decorative hexavalent chromium electroplating to transition to trivalent chromium  
Jan. 1, 2027 - Final date for all existing hard hexavalent chromium to transition to trivalent chromium plating  
Jan. 1, 2032 - Effective date for the ban of all existing chromic acid anodizing

In order to better understand hexavalent chromium emission sources, the CARB will be conducting site visits, facility-specific surveys, emissions source testing, and ambient monitoring in and around existing plating facilities. This data collection will then serve to prioritize emissions reduction strategies.

While decorative applications will be the first affected by the new regulations, functional applications are next. Many customers will not be open to the use of alternative methods. As of now, there is no indication that hard chrome and chromic acid anodizing are replaceable processes.

Chrome plating is a process used in aerospace, defense, and many

other industries to improve metal parts. It offers many beneficial properties that are valuable to these industries. For example, aviation manufacturers use chrome plating to improve the atmospheric corrosion resistance of metal parts and prevent dangerous, mid-op failures of critical equipment. Chrome plating also:

Reduces friction, Improves durability, Reduces seizing & Resists oxidation and corrosion. In addition, chrome plating can be used as bulking material to restore the original dimensions of metal components without compromising their integrity. Please consider this in your decisions. Thanks

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 16:45:36

No Duplicates.

**Comment 72 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Wesley  
Last Name: Turnbow  
Email Address: wturnbow@emeplating.com  
Affiliation: EME, Inc.

Subject: Pollution Controls Work! They stop hexavalent chrome in its tracks.  
Comment:

Hello CARB Members:

I wanted to send you proof of the effectiveness of source controls when it comes to hexavalent chromium emissions. I have attached the Excel version to make it easy for your team to check formulas.

The South Coast AQMD monitored our facility fence line to fence line for 9 months. The attached data was pulled from their website. The fence line monitors were within 20 feet of our buildings, and our chromic acid anodize tank and spray booths were directly in between, as the prevailing winds blow. And the winds off of the ocean are fairly predictable. EME, Inc. was one of the first, if not the first, to place pollution controls on our chromic acid tank. That tank and the paint booths are fitted with HEPA filtration.

Note that the difference between the monitors is 0.00 nanograms when the one significantly test result is thrown out (it is less than a quarter of a nanogram even with that anomaly). The fact that there are low amounts of hexavalent chromium in the monitors at most times is because the Alameda Train Corridor and Alameda Ave (a large thoroughfare) are just downwind from our facility.

Bans are not the way to go! When it comes to hexavalent chromium, source controls have done the job effectively for years.

Best regards,

Wesley Turnbow  
E. M. E., Inc.  
431 E. Oaks Street  
Compton, CA 90221  
(323) 717-7871 mobile

Attachment: 'www.arb.ca.gov/lists/com-attach/79-chromeatcm2023-AGVROgdjWVUFalcy.pdf'

Original File Name: EME Hexavalent Chromium Monitoring 2017-2018.pdf

Date and Time Comment Was Submitted: 2023-01-17 16:57:35

No Duplicates.

**Comment 73 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: A question for the CARB Board  
Comment:

Considering that CARB is expert in pollution control methods and chrome platers are experts in chrome plating, how is it possible for CARB to imagine that a replacement technology for hard hexavalent chrome plating will emerge by 2039 , but CARB is not able to imagine an improvement in hex chrome pollution control methods over the same period? Only a ban will suffice.

By virtue of this non-emission based proposal, CARB has explicitly assumed that they will make no improvements in pollution control methods for the next 16 years. If I was a member of CARB staff focused on improving pollution control methods, I would find this very de-motivating. If I was granting budget to CARB to make improvements in pollution control methods, I would slash the budget. But, what will the CARB Board do?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 19:16:17

No Duplicates.

## **Comment 74 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Next Up? The 99%  
Comment:

Imagine that the CARB Board approves this non-emission based ATCM. The EJ's can run a victory lap and 1% of the hex chrome problem will be solved in 2039. But what about the 99% of hex chrome emitters still out there. CARB will now be in a position wherein they have discredited the best available control technologies for dealing with Hex Chrome. HEPA filtration isn't adequate anymore and since 99% of the problem is still there, the EJ's won't be satisfied (unless this was just an isolated witch hunt). The EJ's will demand action and eventually, CARB will need to acknowledge that hex chrome emission do come from the manufacture, use of, and destruction of cement and concrete; that the working of stainless steels including welding and machining cause hex chrome emissions; that even electric vehicles need brakes. What then CARB? You will need a list of imagined replacement technologies to use as excuses for banning cement, stainless steel, and coatings. Is that even achievable? There are practical people and independent thinkers in your organization, they know the reality of the world we live in and while we would all like things to be better, we must focus on the things that are achievable if we are to make progress. We are not going to stop construction of buildings, roads, and vehicles and CARB will not have the political power to ban them. The only alternative is to eventually be honest with the EJ's and show them that the numbers and science don't support the fear that has been created. That the politicians who benefit from the fears are manipulators. That other risks are far more powerful in our lives. If CARB can't be honest, you will no longer be a science focused organization. Perceptions of CARB will continue the shift from being science based to being politics based. Is that what CARB wants?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 19:22:25

No Duplicates.

**Comment 75 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Local vs Statewide

Comment:

According to the health risk data published with this rule proposal, proximity is a major factor in risk. The EJ's say there are local problems in some Southern California communities. They are asking for solutions. CARB's proposal completely misses the local nature of the stated problems and imposes a non-local statewide rule and a statewide ban. Make the whole class stay in for recess when Jeff doesn't get his homework done. This is completely opposite the intent of AB 617 which asks CARB to place emphasis on the needs of local communities. I don't get it.

There is no relief from the ban granted to platers in communities with no residents. There is no relief granted to platers who are not near schools. It is especially curious that there is no provision to allow new permits in areas away from EJ communities and residents so that the platers the EJ community wants out, would have an in-state alternative place to go. A win-win. CARB is not providing a reasonable method for well-intentioned, law-abiding businesses to exist. Why?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 19:35:24

No Duplicates.

## **Comment 76 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Mark

Last Name: Hyman

Email Address: mark.hyman@alliance-finishing.com

Affiliation: Alliance Finishing & Mfg

Subject: Public Comment

Comment:

Dear Board Members,

Your proposed banning of Hex Chrome by 2025 is ill founded based upon complete ignorance of the sources and the quantities of chrome associated with those sources. Platers have complied many times over with proper science of filtration, wastewater treatment, worker training and PPE to make sure that both the employees and the public are properly protected. The amount of chrome emissions is minor ( less than 3 Lbs) compared to volumes of pollutants emitted by diesel combustion, the cutting of concrete, or chrome emissions associated with aviation fuels. The services that the chrome platers provided, be it decorative or functional coatings allow a multitude of industries to meet their engineering and/or aesthetic requirements at a cost that allow jobs to be maintained in California and provides a standard of living to for those respective industries and their employees. I realize that business do not vote, people do and a political body MUST apply and listen to science rather than hysteria, rhetoric, and biases. If not, we the people would still think that the Earth is flat and the planets revolve around the Earth instead of the sun as the Catholic church promulgated in the face of Copernicus's theories. Please do not make the same mistake in legislating out the minor chrome emissions of plating industry and at the same time by turning a blind political eye away from the larger chrome emitting sources because the political and economic fallout from those sources will be a much longer and arduous legal fight by well funded, politically connected industries. It's much easier to attack the smaller industry because political bodies need a scapegoat to continue to prove to its constituents that they are doing right for them. However, when politics negates the science that shows which industries are the larger polluters in favor of going after the low hanging fruit ( e.g. Platers) to "show progress." Let's all be thankful that we all know that the Earth is NOT flat, and that the truth of science continues to prove time and time again that political agenda quite often wants us think otherwise. This is exactly what's going on by NOT legislating significant reductions in the chrome emissions of the larger sources, that would much better protect the health of us all, Going after the plating industry will have no appreciable benefit of improvement in our health and the science continues to prove it over and over. Thank you, Mark Hyman, PhD

Attachment: "



Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 18:59:24

No Duplicates.

**Comment 77 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Is this really about PFAS/PFOS?  
Comment:

There are California chrome platers who have never used PFAS/PFOS fume suppressants.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 19:40:58

No Duplicates.

**Comment 78 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Michael

Last Name: Lanes

Email Address: stayinlanes@gmail.com

Affiliation:

Subject: Necessity for Chromium Plating

Comment:

Chromium plating is necessary for the defence of the United States of America. There are currently no substitutes for this technology. The best and most responsible place on the planet earth is to plate Chromium in the state of California where the regulations are the most strict. Preventing Chromium plating in California will lead to greater pollution and impact on the environment by moving the process to countries and locations that will be subject to less regulation and responsible service providers.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 20:05:48

No Duplicates.

## **Comment 79 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Brad  
Last Name: Kerr  
Email Address: brad@mileschemical.com  
Affiliation:

Subject: Demise of Chromium Electroplating  
Comment:

To whom it concerns....There is no good reason to destroy an industry when you have an alternative in rule 1469. If CARBS alternative is implemented the repercussion can affect many jobs in California and the beginning of the end to the aerospace industry in Southern California.

Having been in this industry for nearly forty years I have seen the worst and best of chrome electroplating. Honestly I can say the worst is behind us with restrictions and controls that were warranted, but that change began many years ago. Today our industry is tightly regulated, to the point chromic acid omissions have a negligible impact on our air quality or our environment in general. Lack of documentation of detrimental affects of hexavalent chromium with the restrictions in place today is really alarming. It is to the point of overkill and the impact can be substantial.

The demise of decorative hexavalent chrome plating will impact our manufacturing industry and actually create other forms of pollution. Just consider the cost of companies to send parts across our border to other States and Mexico. The pollution created to transport the parts is likely worse. Consider the cost to companies that will have to relocate for surely they won't be able to compete with sending parts out of our state.

Then you attach the Aerospace industry which is the heart of SoCal manufacturing. Chromic anodize, hard chrome plating are critical to this industry. It will drive these companies out of our state to areas that would welcome our jobs. Even if the technology existed the aerospace industry literally takes decades to approve and change process. But again why put our industry through so much anxiety when there isn't documentation that todays standards actually are detrimental to our environment. Save jobs and truly understand that ruling against hexavalent chromium electroplating is the beginning of over regulation that will force so many types of manufacturing out of our state or country.

Brad Kerr

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 22:33:13

No Duplicates.

**Comment 80 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Ed  
Last Name: Appleton  
Email Address: edd@thechromeplace.com  
Affiliation:

Subject: TRIVALENT CHROME IS NOT AN ALTERNATIVE – YET  
Comment:

Granted, decorative trivalent chrome has improved over the years and may be suitable for some applications.

HOWEVER...

The motorcycle and automotive industry, in which we serve, is not only decorative but needs to be functional as well. The chrome plated finish needs to have both that beautiful appearance and also be able to withstand the effects of the environment.

The two types of trivalent chrome that are available do not provide the characteristics required for both the aesthetic and anti-corrosive properties in comparison to hexavalent chrome.

The trivalent chrome that looks closer to the hexavalent chrome does not have the anti-corrosive properties and durability while the other one that has better anti-corrosive properties but does not have the aesthetic appearance.

Neither one of these "alternatives" will serve our customer's needs...

Banning hexavalent chrome is not the answer !!!

- Customers and revenue will be driven to other states.
- Businesses, such as ours that strictly serves this clientele, will close and jobs will be lost.
- Banning hexavalent chrome in California will not protect the environment, it will actually increase the overall environmental damage due to looser environmental standards in other states.

There needs to be a balance...

The implementation of proven measures throughout California that have been established in cooperation between the agencies and industry, such as SCAQMD Rule 1469, would provide responsible stewardship of the environment, health standards and businesses.

Therefore, we do not need to eliminate an entire industry that provides beneficial products and services to many companies and consumers in addition to providing thousands of jobs within the State of California.

Thank you for your consideration in this matter.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-01-17 22:44:22

No Duplicates.

**Comment 81 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023) - 45 Day.**

First Name: Jane  
Last Name: Williams  
Email Address: Dcapjane@aol.com  
Affiliation: California Communities Against Toxics

Subject: Chrome Platers  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/13-areades22-WmgGMFJhUzNWfQIy.docx'

Original File Name: 2023-01 CARB Hex Chrome ATCM Letter copy.docx

Date and Time Comment Was Submitted: 2023-01-17 16:39:39

No Duplicates.



**Comment 1 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Florence  
Last Name: Gharibian  
Email Address: florencegharibian@yahoo.com  
Affiliation: Del Amo Action Committee

Subject: Comments on Hexavalent Chrome Rule  
Comment:

Comment uploaded by CARB Staff on behalf of Florence Gharibian.

Attachment: [www.arb.ca.gov/lists/com-attach/91-chromeatcm2023-UzBVMIwvBTQAbgls.pdf](http://www.arb.ca.gov/lists/com-attach/91-chromeatcm2023-UzBVMIwvBTQAbgls.pdf)

Original File Name: CARBHexChromeRule12023.pdf

Date and Time Comment Was Submitted: 2023-01-26 08:52:03

No Duplicates.

**Comment 2 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Charles

Last Name: Lozier

Email Address: cclklozier1@att.net

Affiliation:

Subject: Hex chrome

Comment:

Comment uploaded by CARB Staff on behalf of Charles Lozier.

Attachment: [www.arb.ca.gov/lists/com-attach/93-chromeatcm2023-Vj4HZFUsBAgLbglh.pdf](http://www.arb.ca.gov/lists/com-attach/93-chromeatcm2023-Vj4HZFUsBAgLbglh.pdf)

Original File Name: Hex chrome.pdf

Date and Time Comment Was Submitted: 2023-01-26 09:53:58

No Duplicates.

**Comment 3 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Scott  
Last Name: Henningsen  
Email Address: hms.scotth@gmail.com  
Affiliation: Henningsen Machine Shop

Subject: Hexavalent Chromium Airborne Toxic Control Measure (ATCM)  
Comment:

Comment uploaded by CARB Staff on behalf of Scott Henningsen.

Attachment: [www.arb.ca.gov/lists/com-attach/94-chromeatcm2023-Vj5QM1cuAzFVJQFg.pdf](http://www.arb.ca.gov/lists/com-attach/94-chromeatcm2023-Vj5QM1cuAzFVJQFg.pdf)

Original File Name: HexavalentChromiumATCM.pdf

Date and Time Comment Was Submitted: 2023-01-26 11:48:51

No Duplicates.

**Comment 4 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Jeff

Last Name: Hannapel

Email Address: [jhannapel@thepolicygroup.com](mailto:jhannapel@thepolicygroup.com)

Affiliation:

Subject: NASF Comments on Proposed Amendments to ATCM for Chromium Plating and Anodizing

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/95-chromeatcm2023-AmxTNFYkU2YKU1U2.pdf](http://www.arb.ca.gov/lists/com-attach/95-chromeatcm2023-AmxTNFYkU2YKU1U2.pdf)

Original File Name: NASF Comments on CARB Hex Chrome Rule January 2023.pdf

Date and Time Comment Was Submitted: 2023-01-27 08:22:16

No Duplicates.

**Comment 5 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Art  
Last Name: Holman  
Email Address: art@sherm splating.com  
Affiliation:

Subject: Comment  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/98-chromeatcm2023-VTRUIAB1BD8BaANv.pdf](http://www.arb.ca.gov/lists/com-attach/98-chromeatcm2023-VTRUIAB1BD8BaANv.pdf)

Original File Name: artholman.pdf

Date and Time Comment Was Submitted: 2023-01-27 08:33:32

No Duplicates.

**Comment 6 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Bryan  
Last Name: Leiker  
Email Address: bleiker@klanodizing.com  
Affiliation:

Subject: Comment  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/99-chromeatcm2023-WzcGZVE5WWFSMQR2.pdf](http://www.arb.ca.gov/lists/com-attach/99-chromeatcm2023-WzcGZVE5WWFSMQR2.pdf)

Original File Name: leiker.pdf

Date and Time Comment Was Submitted: 2023-01-27 09:13:35

No Duplicates.

**Comment 7 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Jim  
Last Name: Meyer  
Email Address: jmeyer@aviation-repair.com  
Affiliation:

Subject: Cal EnviroScore areas  
Comment:

If an area is recognized in the CalEnviroScore database as not having residents and therefore has no score then hex chrome plating should not be banned or phased out in that area. Hex chrome plating is necessary and these types of areas are ideal for locating hex chrome businesses. Why send work out of state and to Mexico when there is an in-state alternative? Amend the proposed ATCM to carve out areas with no residential populations and allow hex chrome plating in those areas. It is necessary.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-01-27 09:52:21

No Duplicates.

**Comment 8 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Keaton

Last Name: Curran

Email Address: Keaton.Curran@MacDermidEnthone.com

Affiliation: MacDermid Enthone - Global Chemical Supp

Subject: From a Global Supplier of Plating Solutions

Comment:

Hello to all it may address,

My name is Keaton Curran. I am a product management specialist for decorative finishes and plating on plastic at MacDermid Enthone, a global chemical supplier of plating solutions.

As a global supplier we share in the many woes and goals of regulators, OEMs, and our customers -the chrome applicators - that impact and guide this great industry. The goals and woes that we are here discussing today, the elimination of hexavalent chrome, is one we have listened to and made strides with at all levels of impact on this industry. Our teams around the globe have called upon and listened to applicators, OEMs, and regulating bodies to guide our product offerings and market direction well into the future. Today, we recognize and share with many across the industry the goal to offer sustainable solutions and meet our customer needs.

These sustainable alternatives technologies are growing and improved upon each and everyday as we commit to these goals but also these alternatives have carried many hurdles for the industry to adopt.

In the Decorative segment, a sustainable alternative solution we offer is Trivalent Chrome. Today, Trivalent Chrome with the newest generations can offer matching colors, new colors, leading corrosion resistance, and exceptional uniformity of deposits. But it's not as simple as pumping out hexavalent chrome tank, scrubbing down the line, and pumping in Trivalent Chrome. Applicators must adopt new equipment, train on new analyses, implement new maintenance techniques, finalize local and regional permits, test and market to current or new customers, and of course have the space available, time, and financial capital to complete the transition.

New technologies in Plating on Plastics eliminating Hexavalent Etchants from the Plating on Plastics segments are also growing acceptance into the industry. The fully Chrome-Free alternatives have taken foot largely due to Automotive OEM commitments to sustainability and expansion into new end use industries such as aerospace and electronics but these technologies too have high hurdles and high financial costs to implement. Many applicators in Plating on Plastics will be required to construct or rebuild up to



half of their existing manufacturing line to implement these alternatives technologies. This will incur vast costs, well above the presented estimates by CARB, for line construction, testing, implementation, permitting, and lost production time during installation.

OEMs and their Tier level customers share in these many hurdles as the risk to ensure retesting, re-PPAPing, and approvals are met without interrupting the delicate supply chain this Industry operates on.

Functional Hard Chrome applications eliminating hexavalent chrome are not in our opinion industrially available today and any viable technology are still years away. The development and adoption of such technology will require extensive time and resources to achieve a hexavalent chrome free industry.

As we step forward towards these goals and through the many hurdles our teams at MacDermid Enthone ask with great magnitude to ensure fully adequate funding and reasonable timeliness for applicators and their customers to step firmly into these alternative technologies.

Thank you for your time, and please accept our open hand of support, to everyone here today, to discuss any and all alternative technologies we offer.

Keaton Curran  
Keaton.curran@macdermidenthone.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-01-27 09:46:44

No Duplicates.

**Comment 9 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Brett  
Last Name: Troncale  
Email Address: brett@caltronplating.com  
Affiliation: Cal-Tron Plating Inc.

Subject: Metal finishing  
Comment:

I'm third generation in the plating business following my father and grandfather. This is what we know, this is what we have dedicated our life to. We follow all rules and regulations and will continue to. We would much rather be regulated then shut down. Please allow my son to be able to be 4th generation in this industry in beautiful California. Our family business supports over 160 employee family members that will be hurt by this. A Quote from one of our state inspectors "at least here I can walk in at any time and test admission and ensure regulations are followed, if banned in CA most companies will go to Mexico where it will not be regulated like it is here. It most likely will get much worst". We want to stay in business, we want to offer our services to all industries, we want to follow regulations, we want a safe California. We can work together and solve this without bans. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-01-27 09:55:01

No Duplicates.

**Comment 10 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Clayton  
Last Name: James  
Email Address: cfjames@rmking.com  
Affiliation: King Industrial Hard Chrome

Subject: Hex Chrome Ban  
Comment:

Hello my name is Clayton James and I am the facility manager of King Industrial Hard Chrome located in Fresno, CA. We are a small company with only 2 employees, but the work that these two employees process affects the whole world including you if you own anything made with cotton. That's what we do is manufacture and Chrome plate cotton picker spindles. We sell and ship these parts all over the world to be used in cotton pickers. We utilize closed tanks with merlin covers and edd filters and our emissions are far lower than the current regulations require. The current regulations limit our emissions to be lower .015mg per amp hour. Our tanks actual emissions are 0.0000058 m/g per amp hour. Our facility total emissions for last year were 12.46mg our total limit allowed is 18,000mg. We choose to to keep our emissions low we take great pride in running a clean shop and keeping our employees safe. The only other companies that manufacture and hard Chrome plate cotton picker spindles are located in China.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-01-27 10:35:56

No Duplicates.

**Comment 11 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Caroline

Last Name: O

Email Address: caroline.oriya@gmail.com

Affiliation:

Subject: Proposed Amendments to the Airborne Toxic Control Measure for Chromium  
Comment:

Many communities around California are overburdened by hexavalent chromium, as the slides shown today have demonstrated. The use of these toxic chemicals can cause serious health problems for workers and local residents alike.

Switching to trivalent chromium has the benefit of not only significantly reducing the toxic emissions of one of the most dangerous chemicals known in our communities but facilities using trivalent chromium avoid having to use other toxic fume suppressants as well.

Respectfully I, urge the board to take this important action in the Chrome Plating ATCM now, to gain early reductions in the many communities affected by the decorative chrome platers.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-01-27 10:59:25

No Duplicates.

**Comment 12 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Wesley  
Last Name: Turnbow  
Email Address: wturnbow@emeplating.com  
Affiliation:

Subject: Comment  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/106-chromeatcm2023-AnYFdIEiUWwHY1U6.pdf](http://www.arb.ca.gov/lists/com-attach/106-chromeatcm2023-AnYFdIEiUWwHY1U6.pdf)

Original File Name: turnbow.pdf

Date and Time Comment Was Submitted: 2023-01-27 11:04:16

No Duplicates.

**Comment 13 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Jaime  
Last Name: Lopez  
Email Address: jaimeilo@usc.edu  
Affiliation: University of Southern California

Subject: Ban Hex Chrome  
Comment:

I am a resident in Paramount, CA and a doctoral candidate at the University of California focusing on environmental justice issues in Southeast Los Angeles. I hope everyone can acknowledge that there is gross imbalance between those in attendance being paid to advocate for industry and virtually all of the disadvantage residents who live in the more than 100 environmental justice communities in CA who can't be here today. Many vulnerable community members do not have the capacity or awareness to yet fully understand the environmental harms that CARB is trying to protect them from, and they also may not have the luxury of an employer to pay for their attendance today.

Many statements made in support of industry fail to present arguments that indicate they've thought about environmental justice beyond their own self-serving perspectives and individual identifications such as, "I've been working at this company for X number of years", "I like my job" "I'm good at my job", "I'm x years old and still healthy and alive", etc. etc. It is clear from many of the statements today that environmental justice not understood within a larger societal context.

It is also tragic that employees are being paraded today on behalf of industry to downplay the harmful environmental conditions that environmental justice scholars and scientists have identified for decades.

Frontline communities are at the real victims here, and thank you CARB for standing up for those who can't speak for themselves today.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-01-27 11:49:54

No Duplicates.

**Comment 14 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Amy  
Last Name: Kyle  
Email Address: amydkyle@berkeley.edu  
Affiliation:

Subject: Comment  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/108-chromeatcm2023-AGECaVEpUmoGeQNv.pdf](http://www.arb.ca.gov/lists/com-attach/108-chromeatcm2023-AGECaVEpUmoGeQNv.pdf)

Original File Name: amykyle.pdf

Date and Time Comment Was Submitted: 2023-01-27 12:35:17

No Duplicates.

**Comment 15 for Proposed Amendments to the ATCM for Chromium Electroplating and Chromic Acid Anodizing Operations (chromeatcm2023). (At Hearing)**

First Name: Anthony

Last Name: Rendon

Email Address: Non-web submitted comment

Affiliation:

Subject: Comment

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/109-chromeatcm2023-AnFQNwFyWSRWIANn.pdf](http://www.arb.ca.gov/lists/com-attach/109-chromeatcm2023-AnFQNwFyWSRWIANn.pdf)

Original File Name: sar.pdf

Date and Time Comment Was Submitted: 2023-01-27 12:36:30

No Duplicates.