

Comment 1 for Open Comment for the May 22, 2025, Board Meeting (may2025opencomm) - Non-Reg.

First Name: Jim

Last Name: Meyer

Email Address: jmeyer@aviation-repair.com

Affiliation:

Subject: CARB Chrome ATCM

Comment:

Two years ago, the Board decided to take the regional SCAQMD Rule 1469, the toughest rule in the world, and apply it statewide. The resulting ATCM could have positioned CARB as a leader in fighting toxics. However, simultaneously, the board banned (future date) the hard chrome plating companies that were already complying with SC AQMD Rule 1469. The ban included companies who were located in non-residential areas, not near schools or sensitive receptors, not using PFAS, with fully compliant BACT and who obviously were capable of meeting the toughest regulatory standards in the world!

The implications of this action were immense. CARB's willingness to ban compliant firms with the demonstrated capability to meet the toughest standard in the world proves that CARB does not view business as partners in the effort to improve the environment. How can you ban the most capable firms in the world and call yourselves leaders? It should be obvious that without the participation of industry, the world's environment cannot improve. The banning decision is two years old, plating companies are making plans to transfer work to Mexico and other less regulated environments. As a result, net air pollution will increase and as we all know, air is not stationary. There has been no progression that I am aware of in the ability of trivalent chrome plating to replace hexavalent chrome plating for flight critical aviation parts.

I remain available to work with staff to amend the rule to eliminate the ban for hard chrome applications where a technological and legal (FAA) alternative does not exist.

I would appreciate an acknowledgement of this comment and an assignment to staff that they work to amend the rule to eliminate the hard chrome plating ban.

P.S. Immediately following the LA Fires, we used hard chrome plating to repair aircraft used to fight the fires. The repairs we made will enable the aircraft to fight future fires and by doing so, will eliminate more hex chrome than we emit annually.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2025-05-22 09:17:06

No Duplicates.

**Comment 2 for Open Comment for the May 22, 2025, Board Meeting
(may2025opencomm) - Non-Reg.**

First Name: Kathy

Last Name: Saechou

Email Address: kathy.saechou@valleyvision.org

Affiliation:

Subject: Comments on Clean Cars 4 All & the Driving Clean Assistance Program (DCAP)

Comment:

See attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/3-may2025opencomm-WjFVMgRxVG8EewRb.pdf'

Original File Name: Kathy Saechou -DCAP_CC4A public comment.pdf

Date and Time Comment Was Submitted: 2025-05-22 11:36:40

No Duplicates.

There are no comments posted to Open Comment for the May 22, 2025, Board Meeting (may2025opencomm) that were presented during the Board Hearing at this time.