

The logo for the Metal Finishing Association of Southern California (MFASC) is displayed in a stylized, bold font. The letters are white with black outlines and are set against a background of horizontal black lines.

April 26, 2007

**METAL FINISHING ASSOCIATION OF SOUTHERN CALIFORNIA INC.**

Via Electronic Mail

Chairman Sawyer and Board Members  
California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812

**Re: Comments to Final ATCM for Chrome Plating and Chromic Acid Anodizing Operations**

Dear Chairman Sawyer and Board Members:

We are writing this letter on behalf of the Metal Finishing Association of Southern California, Inc. ("MFASC") and the Surface Technology Association ("STA") regarding the California Air Resources Board ("CARB") Staff's final version dated April 2007 of the Final Amended Air Toxic Control Measure ("FAATCM") for chrome plating and chromic acid anodizing operations, which addresses hexavalent chromium ("Cr6") emissions from these businesses.

We reviewed the FAATCM in the context of the CARB Staff's original and modified text for the proposed ATCM and list those changes below. For the most part, we do not have a concern over the proposed changes and identify those changes with the comment "No issue." Our primary comments are limited to a few textual changes within the FAATCM and its Resolution. For these items, we suggest minor improvements in text language to clarify or make the text consistent with the intended meaning.

All of the following comments are made in chronological order with the text of the FAATCM. Where an issue exists, these particular comments are bolded for ease of reference..

1. Some notes are revised to include additional explanation or authority cited (See, e.g., Attachment 1, Page 2). No issue.
2. **The definition of HEPA removed "or larger" in reference to the particle size that the filter could remove. There does not appear to be a reason why these words were struck since the filter does collect particles of larger size (section 93102.3(a)(2) at Attachment 1, Page 8).**
3. Three clarifications at 93102.4 in describing facilities with enclosed tanks, adding section 93102.16 and deleting five year implementation schedule. No issue since these points clarify or correct the text.
4. 93102.4(a) adds 93102.16. No issue.

California Air Resources Board  
April 26, 2007  
Page 2

5. **Added "93102.4" to title at 93102.4(a)(1) preceding "(b)" (Attachment 1, Page 14). For consistency, I suggest that "93102.4" be added to modify the term "(b)" throughout at sections 93102.4(a)(1)(A), (B), (C) and 93102.4(a)(2).**
6. **Footnotes below Table 93102.4(a)(1)(B) also apply to Table 93102.4(a)(1)(A). I suggest that the footnotes show that they apply to both Tables or the footnotes be added directly below Table (A).**
7. 93102.4(a)(1)(C). Added term "parameter". No issue.
8. **93102.4(b)(2)(A) is revised to exclude the definition of the distance measurement. New sections 93102.4(b)(2)(A)(1) and (2) now describe the distance measures. I suggest the term "hexavalent chromium" be added to (1) to modify the undefined term "plating or anodizing tank".**
9. Removed term "(b)(2)" from 93102.4(b)(3)(C). No issue since (b)(2) does not have time requirements.
10. Deleted term at 93102.4(c)(1)(B). No issue.
11. Modified 93102.4(c)(2) to meet the permitting agency's risk analysis procedures. No issue.
12. Modified 93102.4(c)(3) to limit the change to add-on air pollution control devices. No issue.
13. Modified 93102.4(d)(5) to limit exception to 93102.4(d)(2) to HEPA installation. No issue.
14. 93102.5(b) clarifying language. No issue.
15. **Modified 93102.5(b)(1) to now require all compliance and recordkeeping under the ATCM (not just the section) to be conducted by trained persons. The change is significant since it appears to mandate that all recordkeeping under the ATCM can only be performed by the trained person. It is unclear whether persons under the direction of a trained person can perform recordkeeping activities for every aspect of the ATCM. I suggest inserting after "only" "under the direction of".**
16. Changed a specific schedule within 93102.5(c)(5) so that "cleaned at least once every seven days in one or more of the following manner" now modifies dusting, etc and does not modify non-toxic dust suppressants. No issue.
17. Added an additional section to 93102.6(a)(3) that does not apply to trivalent chromium operations. No issue.

California Air Resources Board  
April 26, 2007  
Page 3

18. New section 93102.6(a)(4). Old section changed to become 93102.6(a)(5). No issue.
19. 93012.7(a)(3) is modified and deletes the "180 days after installation of the control equipment". No issue.
20. Two new chemical fume suppressants are now included in Table 93102.8. No issue.
21. Added clarifying language to 93108(b)(1) "normal operations". No issue.
22. Clarified 93102.13(b) now applies to all of ATCM. No issue.
23. 93102.14(b), (c) and (d) are modified and concurrence may be now required in certain instances by ARB. The change only applies to alternative test methods under 93102.7. 93102.14(d) now requires that ARB be copied by the permitting agency on everything that is sent to EPA. No issue, although it is contrary to CARB's position that it would not be involved in the ongoing actions under this ATCM.
24. Appendix 2, at 1., now contains distance measuring information. It requires the distance to the first sensitive receptor no matter the distance. No issue.
25. Appendix 3 at 1., now contains distance measuring information. No issue.
26. **The Resolution contains an inartful description of cancer risk in Paragraph 1, Page 3. I suggest the following to be inserted after the word "exposed" so that the explanation is scientifically correct, "assuming a constant 70-year rate of exposure."**
27. **The Resolution requires a paragraph identifying that an additional public hearing was held on December 7, 2006.**

We hope our comments help to provide CARB with the best language to achieve the intent of the FAATCM. Our industry has worked diligently with your agency to reach this result. We hope to continue our role as a leader in safe and reasonable environmental compliance for the state of California. We trust our efforts will be considered.

Very truly yours,

  
\_\_\_\_\_  
Daniel A. Cunningham  
MFASC Executive Director  
STA Executive Director