Chair Liane Randolph and Members

California Air Resources Board (CARB)

1001 I Street

Sacramento, CA 95814

RE: Comments on the ATCM for Chrome Platers

Dear Chair Randolph and Members of the CARB Board,

For decades, environmental justice groups in Los Angeles have worked with the California Air Resources Board, the USEPA, and the South Coast Air Quality Management District (SCAQMD) to reduce emissions of hexavalent chromium for the chrome plating industry. Over the past three decades some of our organizations have:

* measured hexavalent chromium at the fenceline of these facilities in coordination with regulatory agencies,
* engaged in biomonitoring projects in affected communities,
* initiated enforcement actions against chrome platers,
* participated in the workgroup which published the CARB Land Use Planning Handbook, urging local planning officials to create setbacks from highly toxic facilities in their jurisdictions,
* urged local officials to more rigorously inspect and regulate the dangerous practice of chrome plating in highly impacted communities,
* attended countless public hearings, workgroups, townhall meetings, and engaged with both the regulatory officials and industry.

A few of our organizations have stayed directly and actively engaged in efforts to regulate this dangerous industrial practice for more than three decades now. We have educated, agitated, advocated, gathered data, produced data, mapped data, explored solutions with manufacturers, worked on the identifying solutions to rigid military manufacturing specifications, organized conferences on alternatives to chrome plating, and now we are here in front of you: the California Air Resources Board.

We are asking you, with all due respect, to finally take action to end this 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. More than half the chrome platers in California are near a school, church, or neighborhood.

It is with chagrin that we analyzed the data in Appendix B to find that over 20% of the platers in the state appear to have exceed their permitted ampere hour limits, and that more than half of the platers in the inventory are permitted for more than 1 million ampere hours of use. As well, many of these platers are using highly toxic fume suppressants, which are actually more toxic than hexavalent chromium. The State Water Resources Control board has issued orders to 222 chrome platers to test the ground water underneath their facilities for PFAS compounds. The use of these highly toxic fume suppressants has caused enormous damage to California’s groundwater resources (estimates for PFAS cleanup are in the billions of dollars).

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. We have worked with the Legislature to establish a fund to help chrome platers that are small business with the cost of switching their plating process. We will continue to work with both the regulatory, and the regulated, community to secure future funding for these important efforts.

We support the proposed regulation before you and 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, 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. We continue to look forward to working with staff and the Board as this phase out rolls out.

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

Sincerely,

Jane Williams

Executive Director

California Communities Against Toxics

Rosamond, CA

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