

From: [Eric Svenson Jr](#)
To: [Eugene Rubin \(eugene.rubin@arb.ca.gov\)](mailto:eugene.rubin@arb.ca.gov)
Subject: Hexavalent Chrome
Date: Tuesday, November 15, 2022 1:43:00 PM
Attachments: [image001.png](#)

Dear Eugene,

We understand that CARB is considering a ban on hexavalent chrome in the state of California and ask that this policy be reconsidered.

Elected and unelected government officials have a responsibility to protect people, their livelihoods, the economy, and our environment. Naturally, there is a balance that must be found between these responsibilities and the industries that are necessary for our national defense. Finding common ground is tantamount to our very survival as a free society.

The hexavalent chrome is one such item that is used in a multitude of industries. Unfortunately, it is under attack by forces that use past events, outdated and / or questionable reports, and extreme emotions to eliminate it. Today, there are technologies and methods that have been demonstrated to greatly reduce the inherent risks of hexavalent chrome when they are properly implemented. These strategies should be the basis for finding the solutions to balance the need to protect people's health, the environment, and the industries that require hexavalent chrome.

Aerospace and defense companies like Boeing rely on hexavalent chrome plating, which is called for in many of their specifications such as BAC5709 and MIL-STD-150F, to produce quality parts that protect human life and our nation. Critical parts used in aircraft landing gear assemblies and propulsion systems require hexavalent chrome to properly function. There is no suitable replacement for hexavalent hard chrome. The process to amend a MIL-SPEC is no simple task requiring years of rigorous testing. No competent person or group would sign off on an unproven technology when so much is at stake.

If CARB implements the proposed ban on hexavalent chrome, the work that Boeing and other aerospace and defense companies require will be sent out of the state of California. There is also a real possibility that the current hexavalent chrome shops will relocate to neighboring states. California would lose additional citizens and further erode its tax revenue. An additional consequence would be the added cost and emissions due to additional transportation mileage. It seems that the negative impact to banning hexavalent chrome in the state of California far out ways any perceived benefit when current technologies are available to mitigate its inherent risks.

We appeal to your civic duty and kindly request that the proposed ban on hexavalent chrome be pulled from consideration.

Sincerely,
Best regards,

Eric Svenson, Jr

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