

Via electronic submission: <https://www.arb.ca.gov/lispub/comm/bclist.php>

Steven S. Cliff, Ph.D., Executive Director  
California Air Resources Board  
101 I Street  
Sacramento, CA 95814

RE: *Second Notice of Public Availability of Modified Text and Availability of Additional Documents and information on the Proposed Amendments to the Airborne Toxic Control Measure for Chromium Electroplating and Chromic Acid Anodizing Operations*

Executive Officer Dr. Cliff:

As a small business owner, I am appalled that your department did not reassess their recommendations after *discovering that their initial assessment of the emissions data was flawed* over a factor of a misplaced decimal point in their recommendations of **banning chrome plating** in California – an essential industry serving the medical, mining, defense, and aerospace industries.

Even with the correction of the mathematical error in decimal placement, the resulting emissions data is an over representation of the factual emissions data of chromium emissions of chrome plating in California.

Based on actual emissions data, the removal of **all** hexavalent chromium emissions from the plating industry would do little, if anything, to reduce the risk. The **revised emissions data** represents **less than 1% of total hexavalent chromium** emissions in California---less than one (1) pound per year.

Without correct information, the conclusion drawn by the Board will be based on flawed assumptions.

I recommend that the proposed modifications to the ATCM should be revised to include a requirement for a technology review to be conducted prior to the 2030 ban date to assess the transition to alternative technology and determine if more time is needed to phase out functional chromium plating for **all applications**.

I strongly recommend that the Board reconsider its decision to ban hexavalent chromium plating and instead implement an **emissions-based rule** to ensure that emissions continue to be reduced to protect human health and the environment. Regulation, not elimination, is what we need.

Sincerely,

Sylvia D. Rodriguez | President

AMEX Plating, Incorporated