



**ROLL TECHNOLOGY WEST**  
**DIVISION OF CHROME DEPOSIT CORP.**  
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California Air Resources Board

Re: Chrome ATCM proposal

Dear CARB Board Members


RTW is a hard chrome plating facility located in Pittsburg, California. We have been in business since 1994 and currently have 6 full-time positions with jobs that provide our employees and their families with good pay and benefits. I am writing to formally voice our opposition to the current recommendations by CARB staff to ban the use of hexavalent chrome. Below are a few facts for your consideration.

- The currently proposed ATCM for hexavalent chrome is not supported by science or technology.
- CARB staff knows that their recommendations will have very little impact on overall hexavalent emissions in the state as most of those emissions come from sources other than plating and anodizing.
- CARB staff has been pressured by the environmental industry in our state to propose these new regulations.
- Our affiliate companies in the EU obtained a REACH exemption by demonstrating the social economic benefits outweighed the environmental risk in our use of hexavalent chromium.
- The use of Hexavalent chrome has been on the radar for elimination worldwide for more than 25 years.
- There is no technology available for the replacement of hexavalent chrome in most applications where hard chrome is needed. In my line of work the research started more than 25 years ago and is still ongoing, but no such technology exists.
- Once a viable alternative is identified, it is expected to take a minimum of 10 years for R&D work to get to commercial viability to completely ensure the alternative meets all the characteristics and positive attributes that hexavalent chrome currently provides. Any deadline date is unsupported from a scientific and technical standpoint.

- The use of hexavalent chrome provides a hard and durable surface that keeps many machine parts in service longer, thus benefiting the environment by reducing additional manufacturing of new parts.
- The use of hexavalent chrome provides a durable and appealing finish that cannot be matched by using trivalent chrome.
- Should hexavalent chrome be banned the consumer demand will not go away. Then the risk is from more products being shipped from out of state or the emergence of an underground industry, both leading to increased air pollution for all Californian's.
- Throughout the years the plating industry, CARB, and the many districts throughout the state have worked collaboratively to insure clean air in our shops and communities. This should continue.

A ban on hexavalent chrome makes no sense. The use of hexavalent chrome is well regulated and facilities operating under district rules pose no threat to communities. Unfortunately, the environmental industry will no doubt use some unfortunate individuals claiming their ill health is related to the use of hexavalent chrome to try and persuade you otherwise. This misguided, agenda driven, and despicable effort should be rejected outright. The current proposals will in no way improve California's air. The more likely outcome is greater air pollution. Please reject the proposed ATCM's.

Sincerely



James R. Goehring, Manager  
Roll Technology West