



September 17, 2015

Richard W. Corey
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, California 95814

Mr. Corey:

In September 2012, the United States Environmental Protection Agency (U.S. EPA) published the final amendments to the National Emission Standards for Hazardous Air Pollutants (NESHAP) – Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 C.F.R. Part 63, Subpart N (commencing with § 63.340), 77 Fed. Reg. 58219 (September 19, 2012)). Among other things, the regulation sets a ban on the use of perfluorooctane sulfonic acid (PFOS) in fume suppressants, effective September 21, 2015.

While industry understands the need to ultimately transition to non-PFOS fume suppressants to address national water quality issues, additional time is needed to make this transition. California chrome platers have been working with staff from your agency, local air districts, and fume suppressant manufacturers to develop and test alternative non-PFOS fume suppressants to use either alone or in combination with other control technologies in order to comply with federal, State, and local emission control requirements for hexavalent chromium. Once a non-PFOS fume suppressant is tested and has successfully demonstrated its use in controlling hexavalent chromium emissions, facilities will need to demonstrate its feasibility in their operations and may require additional time for testing and adjusting customers specifications, such as those in military and aerospace applications. Therefore, on behalf of chrome platers in California, with the exception of those located within the South Coast Air Quality Management District (SCAQMD), we are requesting a one-year extension of the PFOS phase-out to allow for continued testing, and to further evaluate the efficacy and feasibility of non-PFOS fume suppressants in our chrome plating operations. We understand that the SCAQMD will be addressing the requirements for its chrome plating facilities separate from this request.

We know that your agency has done extensive testing over the past several years and is continuing to test non-PFOS products to certify suitable replacement(s). In addition, we understand that additional testing is underway and you expect product(s) to be certified within the next year. Once a non-PFOS product is certified, facilities will be able to use this fume suppressant in their operations. Our intention is to replace PFOS fume suppressants with certified non-PFOS fume suppressants and any other control technologies needed to maintain compliance with California requirements within the one year extension period.



Thank you in advance for considering our request. If you have any questions or need further information, please contact me at (818) 845-7251.

Sincerely,

Bryan Leiker
MFASC President

cc: Alan W. Abbs
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