



# Chrome Plating ATCM Amendments

Technical Working Group #6 and Public Workshop  
01/20/2022

# Meeting Agenda

- Introductions
- Working Group #5 summary
- Activities since last working group
- Revised Concepts
- CARB Analysis
- Environmental Assessment/CEQA
- Cost Analysis and SRIA
- Input and Alternatives Solicitation
- Next Steps
- Questions

# Working Group 5 Summary

- Held 5/26/2021
- Draft Concepts:
  - No new hex chrome plating or chromic acid anodizing facilities
  - No additional new chrome-containing tanks at existing facilities
  - Decorative plating – remove hex chrome within 2 years of effective date of amendments
  - Functional plating – remove hex chrome within 6 years of effective date of amendments
  - Chromic acid anodizing – remove hex chrome within 11 years of effective date of amendments
  - No tech review provision

# Post Working Group 5 Activities

- Received comments from several industry and association representatives
- Held meetings with Environmental Justice Community leaders
- Held meetings with industry representatives and conducted informational site visits at:
  - Sherm's Custom Plating
  - Fleet Readiness Center
  - Valley Plating
  - K&L Anodizing
  - Hawker Pacific Aerospace
  - United Airlines

# Post Working Group 5 Activities

- Reviewed trivalent technology
  - Decorative plating alternatives exist today
  - Functional plating alternatives are in development but need more time
  - Chromic acid anodizing replacements not currently under development

# Revised Concepts – New Hexavalent Chrome Installations

- No new facilities may be constructed after the effective date of the rule
- Existing facilities may modify their hexavalent chrome operations if there is no increase in potential chrome emissions associated with the action

# Revised Concepts - Decorative Plating

- Phase out hexavalent chromium within 2 years of effective date of the amendments
  - Anticipated effective date between Oct 1, 2023 and Jan 1, 2024
  - Anticipated phase out date for hex chrome between Oct 1, 2025, and Jan 1, 2026
- Considering a narrow exemption for “decorative” plating done for functional reasons
  - Must have a specific standard or requirement

# Revised Concepts – Functional and Anodizing

- Phase out hexavalent chromium within 15 years of effective date of the amendments based on technology reviews
- Periodic technical reviews to be conducted before phaseout date to determine if more time is needed for technological development
- Additional controls to reduce emissions before phaseout dates



# Revised Concepts – All Facilities

For all facilities using hex chrome after Jan 1, 2026

Requirement	Estimated Compliance Date
Enhanced housekeeping and best management practices	07/01/2024*
Building enclosures Add-on controls for non electrolytic chrome tanks Potential for lower hex chrome limit	01/01/2026
Biannual source testing frequency	Starting 01/01/2026

\* facilities that plan to operate with hex chrome after Jan 1, 2026, must implement these requirements within 6 months of rule effective date

# CARB Analysis

- Staff report will include:
  - Environmental Assessment (EA)
    - Per CEQA requirements
  - Standardized Regulatory Impact Assessment (SRIA)
    - Economic assessment of proposed regulation
  - Health Risk Assessment

# CEQA – Notice of Preparation

- Beginning of CEQA process
- CARB must provide notice that it will prepare an Environmental Assessment for this regulation
- Notice includes project description and probable environmental impacts
- Available to review on our [Chrome Plating ATCM website](#)
- Initial comment period on the notice until **February 9, 2022**

# Environmental Analysis

- Environmental Analysis (EA) being prepared analyzing potentially significant adverse impacts caused by reasonably foreseeable actions
- Meets requirements of CARB's certified program under the California Environmental Quality Act (CEQA)
- The CEQA Environmental Checklist (CEQA Guidelines Appendix G) is used to identify and evaluate potential indirect impacts
- The EA will be an appendix to the Staff Report

# Environmental Analysis to be Prepared

- The EA will include:
  - Description of reasonably foreseeable actions taken in response to the proposal
  - Programmatic level analysis of potential adverse impacts caused by reasonably foreseeable actions
  - Feasible mitigation measures to reduce/avoid significant impacts
  - Alternatives analysis
- Input invited at this early stage on appropriate scope and content of the EA
- Draft EA will be released for 45-day public comment period

# SRIA - Preliminary Cost Document

- Presents cost assumptions that will be used to establish:
  - Business-as-Usual
  - Incremental cost of the regulatory concepts and alternatives
  - Staff report and SRIA will document actual costs used for analysis
- Importance of calculating the cost of the regulation:
  - “CARB’s mission is to promote and protect public health, welfare, and ecological resources through effective reduction of air pollutants while recognizing and considering effects on the economy.”
- Please submit any additional cost data for our analysis and any comments by Feb 18, 2022

# SRIA Request for Alternatives

- Pursuant to SB617, CARB welcomes public input on alternatives to the draft regulatory proposal discussed in this workshop
- CARB encourages public input on alternative approaches that:
  - May yield the same or greater emissions benefits than those associated with the proposed regulation, or
  - May achieve the goals at lower cost

# Request for Alternatives

- Please ensure the submission discusses the alternative's ability to fulfill the purposes of the draft regulatory proposal as CARB has presented it
- Please submit the associated cost/benefit information and data sources to enable comparison of economic impacts
- Please also submit a clear description of the basis for any cost calculations



# Comment Deadline – SRIA Alternatives

- The deadline for submission of alternatives relating to economic impacts is February 18, 2022
- Alternatives may be submitted via email to [Eugene Rubin](#)

# Next Steps

- Comment Periods
  - CEQA Notice of Preparation/initial input ends February 9, 2022
  - SRIA – Preliminary Cost Document ends February 18, 2022
  - SRIA – Suggested alternatives ends February 18, 2022
- Draft Regulation Language – February 2022
- Work Group Meeting #7 – Spring 2022
- Initial Board Hearing – October 27-28, 2022

# Questions + Comments

# CARB Contacts

- Eugene Rubin (Staff Lead)
  - [Eugene Rubin](#)
  - 916-287-8214
- Maria Vacaru (Staff)
  - [Maria Vacaru](#)
  - 279-208-7905
- Greg Harris (Manager)
  - [Greg Harris](#)
  - 916-327-5980
- Robert Krieger (Branch Chief)
  - [Robert Krieger](#)
  - 916-323-1202
- [Subscribe to the Chrome Plating ATCM Mailing List](#)