



# **Chrome Plating ATCM Amendments**

Technical Working Group #4

4/29/2021

# Meeting Agenda

- Introductions
- Working Group #3 summary
- Response to Comments from Working Group #3
- Summary of Draft Proposed Rule Language
- Questions

# Working Group 3 Summary

# Work Group 3 Summary

- Summary for trivalent plating technologies
- Cost estimates for decorative trivalent plating technology
- Draft regulatory concepts

# Working Group 3 Comments

# Comments from Working Group 3

- Comment 1 – Are health benefits being considered in this rulemaking?
  - Response – Yes, CARB's goal is to reduce the cancer risk to the public from these sources.

# Comments from Working Group 3

- Comment 2 – How many platers are near sensitive receptors?
  - Response – There are 102 platers in CalEnviroScreen disadvantaged communities, and 21 platers located in 617 communities. Approximately 50 platers are located within 100 meters of a sensitive receptor.



# Comments from Working Group 3

- Comment 3 – Please confirm the ~4 lb of emissions listed in the presentation. Previous work group stated closer to ~3 lb.
  - Response – The original 3 lb of emissions is attributed to 80% of the facilities in the inventory for which CARB has actual emissions data. The last 1 lb comes from applying the same ratio of actual to potential emissions for the 20% of facilities with unknown actuals to determine estimated actual emissions for those facilities.



# Comments from Working Group 3

- Comment 4 – Surface plating makes up less than 1% of hex chromium emissions nationally.
  - Response – This number comes from the 2005 National Emission Inventory. CARB staff reviewed the 2017 National Emission Inventory which seems to agree with 2005 estimates. However, the inventory only lists ~1/2 of known chrome platers in California.

# Comments from Working Group 3

- Comment 5 – What are the ATCM requirements for trivalent plating
  - Response – ATCM lists the following:
    - No add-on control, using wetting agent (non PFAS) as required by chemistry supplier
    - No source testing (may vary by district)
    - Permit fees (vary by district, not set by CARB)
    - Tracking of amp-hrs
    - Housekeeping and equipment maintenance

# Permit Fees

District	Hex Chrome Permit Renewal Fee	Trivalent Chrome Permit Renewal fee
San Diego	\$1,025 (Schedule 55-b without add on control) \$1,891 (Schedule 55-a with add on control)	\$438 (permitted under miscellaneous)
Bay Area	\$2,492 (Schedule G-1, permit to operate fee)	\$480 (permitted under miscellaneous)
South Coast	\$1,507.95 (Schedule C)	\$421.02 (Schedule B)
Sacramento	\$1,081 (miscellaneous fee schedule)	\$1,081 (miscellaneous fee schedule)
San Joaquin	Up to \$1,238 (depending on amp-hrs)	Up to \$1,238 (depending on amp-hrs)

# Summary of Draft Proposed Rule Language

# Draft Proposed Regulation

- Add transition requirements for new, existing, and modified facilities
- Retain requirements to maintain existing ATCM provisions until transition to alternatives occurs
- Remove outdated requirements and replace old compliance dates throughout the regulation
- Update fume suppressant table

# New Facilities

- CARB proposes to prohibit the use of hexavalent chromium in new facilities
  - No person shall install or operate a new hexavalent hard or decorative chromium electroplating facility or a new chromic acid anodizing facility after December 31, 2021.



# Existing Facility Requirements

- CARB proposes to phase-out existing hexavalent chrome facilities
  - No owner or operator shall operate a decorative hexavalent chromium electroplating tank after January 1, 2023
  - No owner or operator shall operate a hard hexavalent chromium electroplating tank after January 1, 2027
  - No owner or operator shall operate a chromic acid anodizing tank after January 1, 2032



# Existing Modified Facility Requirements

- CARB proposes to phase-out existing hexavalent chrome facilities
  - No person shall install or operate a new hexavalent hard or decorative chromium electroplating tank or a new chromic acid anodizing tank after December 31, 2021.

# Other Draft Regulation Proposals

- Existing chrome ATCM requirements remain
- Non-electrolytic tanks not included to be added to current ATCM requirements
- Added definitions for chromic acid mist and chromium trioxide
- Made minor grammatical changes

# Questions + Comments

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