

MFA Webinar CARB CrVI ATCM

August 10, 2022

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MFACA Team

- Bryan Leiker, Executive Director, K&L Anodizing
- Bobbi Burns, Northern President, Global Plating
- Vince Noonan, Southern President, Sheffield Platers
- Justin Guzman, Immediate Past President, Aircraft X-Ray
- Brian Ward, AAA Plating
- Jim Meyer, Aviation Repair
- Jeff Hannapel, NASF
- Christian Richter, NASF
- Jerry Desmond, MFACA Advocate

Timeline of Activities To-Date

- **SCAQMD Rule 1469** – over 2 years of negotiations, MFASC costs exceeded \$650,000
 - Result – workable rule for industry, supported by CARB & NGO's
- **CARB Technical Work Group Meetings** – 7 thus far, first held on September 11, 2020 - online only, none in person
- **NASF Symposium for CARB** – March 3, 2021
- **Informal Discussions** – numerous throughout past 2 years with CARB board members, officials, staff, SCAQMD, allies including:
 - Boeing, United Airlines, Small Business Alliance, California Metals Coalition, Aerospace and Defense Forum, Aluminum Anodizing Council, CCEEB, American Motorcyclist Association, Rod Shows, & others
- **2021 Site Tours** – Sherm's Plating, K&L Anodizing, Hawker Pacific, Valley Chrome Plating
- **Proposed Regulatory Language** – 1st draft dated May 26, 2021
- **Notice of Preparation of Draft Environmental Document** – January 10, 2022
- **Proposed Regulatory Language** – updated draft dated April 26, 2022
- **CARB First Public Workshop** – June 9, 2022
 - Standardized Regulatory Impact Analysis [SRIA]
- **MFA SRIA comments to GoBIZ** – June 7, 2022
- **Dept of Finance SRIA comments to CARB** – June 24, 2022
- **Comments Submitted**
 - NASF Symposium - March 3, 2021
 - Legal Counsel Letters - June 7, 2021 & July 19, 2022
 - MFA Letters - June 4, 2021, June 9, 2021, February 3, 2022, and May 11, 2022
 - Coalition Letter – June 4, 2021
 - California Council on Environmental and Economic Balance [CCEEB] Letter – August 17, 2021
 - United Airlines Letter – July 8, 2021
- **Legislative Days** – June 21, 2021 & March 18, 2022

Current CARB Proposal CrVI ATCM

- **Hexavalent Chromium Phase-out**
 - Ban on New Facilities
 - January 1, 2024
 - Ban on Increasing Amp Hours at Existing Facilities
 - January 1, 2024
 - Ban on Decorative \ Functional Plating
 - January 1, 2026
 - 1 -year extension if needed to deal with delays in the transition
 - Ban on Functional Hard Chrome Plating & Chromic Acid Anodizing
 - January 1, 2039
 - Two technology reviews in the interim

MFA Concerns

ATCM should be an emission-based rule rather than bans

Ban on decorative \ functional CrVI plating

Does not change customer demands

Insufficient time to transition

Strands assets

Does not balance benefits and costs of update

Prohibition on new facilities & permits expanding amp hours at existing facilities after January 1, 2024

Ban on hard CrVI plating and chromic acid anodizing

Stranded assets after Rule 1469

Major uncertainty for aerospace and defense supply chain industry

Prohibition against expanding operations

Source testing should be once every 6 years [like SCAQMD Rule 1469] vs 2 years in current CARB proposal

No off-ramp[s]

CARB Update to CrVI ATCM

- **Key Dates**
 - December 16 CARB Board Meeting – Just Changed to January 2023
 - Spring 2023 CARB Board Meeting & Decision – May be Changed to Summer 2023
 - January 1, 2024 – Effective Date of Rule

Take Action

1

Submit Your Concerns to CARB

Eugene Rubin

Eugene.Rubin@arb.ca.gov

916-287-8214

2

Urge Action By Your Senator & Assembly Member

Identify your Reps:

<https://findyourrep.legislature.ca.gov/>

3

Activate Your Customers

Have them contact CARB

4

Testify in-Person @ CARB Meeting

This is Key to Our Efforts

MFA will provide advance notice and details

MFA Contact

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