



October 2, 2020

Dr. William A. Burke, Chairman
Governing Board
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

COVID-19 Pandemic and 2020 District Rulemakings Impacting Metal Finishing Facilities

Governing Board Chair Burke –

The Metal Finishing Association of California [MFASC] desires to communicate to the Governing Board the serious challenges the COVID-19 pandemic continues to present to our workers and families, as well as the operations of our member facilities and industry.

We remain in continual dialogue with the District staff regarding these issues.

The pandemic has necessitated a redirection of our attention, efforts, and resources to protect the health of our workers and their families with numerous critical measures including personal accommodations, safe distancing, heightened cleaning, temperature checks, and other actions. Productivity is of course impacted, and new worker protection laws have been enacted with unknown impacts on our businesses.

The pandemic has caused a downturn in the economy, impacting our customers in the aerospace and airline industries, as well as our customers desiring decorative plating. The effects vary from company to company, we estimate that business has been reduced between 30% and 40% and could very well decline further.

This unfortunate confluence of events is occurring while many of our members endeavor to comply with the significant new requirements associated with the implementation of Rule 1469 [Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations] that was revised in November of 2018 with MFASC's active involvement. We continue to project that this rule will lead to a significant reduction in the number of facilities that are performing chromium electroplating and chromic acid anodizing.

MFASC is involved in additional proceedings that would impose additional costs and obligations during this period of time. The California Air Resources Board is developing an updated chrome air toxic control measure that could impose requirements and restrictions that exceed those contained in Rule 1469. The State Water Resources Control Board has issued orders to facilities state-wide, requiring sampling to determine any presence of PFAS [*Per- and Polyfluoroalkyl Substances*] which were previously required by the state for years.

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MFASC urges the District to take these developments and context into consideration as we move forward with additional rulemakings that will impact metal finishing facilities, specifically PAR 1426 [*Emissions from Metal Finishing Operations*] and PAR 1469.1 [*Spraying Operations Using Coatings Containing Chromium*], plus additional rulemakings that could commence next year with associated new mandates and costs.

Several new housekeeping requirements and best management practices requirements are being considered that are appropriate additions to these rulemakings. Other concepts, such as measuring air velocity at both the entrance of a spray both and the air filter face, are not necessary – but quite costly - to confirm collection efficiency.

MFASC will continue to be engaged as these rulemakings continue. We remain optimistic that at some point in the future we will overcome the pandemic and its impacts. Unfortunately, that time is not yet upon us.

Sincerely,

Justin Guzman

Justin Guzman
President

Wesley Turnbow

Wesley Turnbow
Past President, Committee Chair

Bryan Leiker

Bryan Leiker
Executive Director

C: Members, Governing Board
Wayne Nastri, Executive Officer