

17-0997.

Wayne Nastri  
Executive Officer  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

October 25, 2017

Dear Mr. Nastri,

Our organizations are very concerned about the lack of protections for communities in the proposed chrome plater rule which South Coast is planning on issuing in a few months. The rule has been significantly weakened since it was first proposed, abandoning ambient monitoring provisions, scaling back the use of HEPA filters, and removing the requirements for total enclosure with negative air. To say we are disappointed is an understatement.

Chrome platers emitting hexavalent chromium into our communities have been very problematic in the South Coast Basin for a long time. Many of our organizations worked on the existing state rule in 2006 and the subsequent local rules in South Coast. We pushed hard for the best protections available then, and to have more stringent requirement for platers located next to schools and sensitive receptors. It is apparent to us now that many facilities just did not comply with the rules and some sources went completely unregulated altogether. From the plater next to Suva School, to Master Plating, to the platers in Paramount and Compton now, the devastating public health effects to communities hosting these plating operations are an endemic part of the terrible history of environmental injustice in the South Coast region.

Chrome platers are concentrated in the Los Angeles area. No one really knows how many of these facilities exist, not even your own staff, but over 10% of all the chrome platers in the nation call the South Coast air basin their home. New facilities operating without permits are discovered often. These platers, already concentrated in our air basin, are further concentrated in low-income communities of color where enforcement is lax and regulators commonly turn a blind eye to complaints about odors and emissions. The communities of Paramount, Compton, and parts of East Los Angeles all have concentrated pockets of platers.

This concentration of chrome platers in communities is further exacerbated by other sources of hexavalent chromium emissions such as forgers and metal heat treaters, and potentially other sources not yet identified. Since there are so few air monitors in the basin which detect hexavalent chromium, it would be simply blind luck if a monitor were to be placed in one of these areas of concentration. Ironically, it was the air monitor placed to measure the emissions from Carlton Forge which inadvertently identified the platers in Paramount as an hexavalent chromium air pollution hot spot.

Each and every source of hexavalent chromium is contributing to the emissions which are endangering our communities. Each and every source needs to take on the responsibility to cease to emit this highly toxic chemical into our homes, schools, play yards, community centers,

and churches. Our communities should not bear the burden for these emissions with their health and well-being.

When the original rule making on chrome platers started earlier this year it envisioned robust monitoring and rigorous air pollution controls for platers. However, pressure from the plating industry has your agency back-tracking on those measures. Without the monitoring, robust pollution controls, and total enclosure of all the industrial processes emitting these dangerous emissions we are no longer confident that this regulatory effort will protect our communities.

We urge you and your staff to consider the damage to public health which releases of hexavalent chromium are known to cause in the communities hosting these hexavalent chromium sources. We also urge you to think about the environment which the workers at these facilities are laboring in; these hexavalent chromium emissions are dangerous to all who work in this industry. We need the agency to insure that these facilities are made to completely capture these dangerous emissions, and to have the necessary monitoring sufficient to ensure compliance with the rules.

The European Union has just passed a regulation which will end the use of chromium for decorative purposes; we urge the South Coast AQMD to consider such as action as well. South Coast has taken similar actions before on dry cleaning facilities to ban chemicals which were damaging air quality and we urge you to consider to doing this for chromium as well.

If our experiences in the communities we represent teach us anything, we have learned that we cannot rely on anything but robust monitoring and a strong enforcement presence to ensure that these facilities are being operated properly and that our communities get the protections they deserve from their government. We urge you to work with us to create a rule which will ensure that families, teachers, workers, parishioners, and community residents are safe from hexavalent chromium in their communities.

Respectively,  
Action Now  
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Executive Director  
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California Communities Against Toxics  
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San Pedro & Peninsula Homeowners Coalition  
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Society for Positive Action  
Shabaka Heru  
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St. Philomena Social Justice Ministry  
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Watts Labor Community Action Committee  
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