December 6, 2010

EPA Docket Center, EPA West (Air Docket)
Attn: Docket ID No. EPA-HQ-OAR-2010-0600
U.S. Environmental Protection Agency
Mail Code 2822T
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Proposed National Emission Standards for Hazardous Air Pollutant Emissions: Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks
Docket No. EPA-HQ- OAR-2010-0600

Dear Sir or Madam:

Enclosed please find comments submitted on behalf of the National Association for Surface Finishing (NASF) in response to EPA's October 21, 2010 proposed National Emission Standards for Hazardous Air Pollutant Emissions: Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. 75 Fed. Reg. 65068 (2010).

If you have any questions, would like additional information, or would like to discuss these comments, please contact me by telephone at 202-257-3756 or by email at jhannapel@thepolicygroup.com.

Respectfully submitted,

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The Policy Group
On Behalf of NASF

December 6, 2010

Comments on the Proposed National Emission Standards for Hazardous Air Pollutant Emissions: Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks *Docket No. EPA-HQ-OAR-2010-0600*

These comments are submitted on behalf of the National Association for Surface Finishing (NASF) in response to the United States Environmental Protection Agency (EPA) October 21, 2010 proposed National Emission Standards for Hazardous Air Pollutant Emissions: Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. 75 Fed. Reg. 65068 (2010). NASF members with hard and decorative chromium electroplating and chromium anodizing processes will be impacted by this proposed rule. These comments summarize some of the NASF's concerns regarding the proposed rulemaking and NASF requests that EPA issue the final regulation with revisions that are consistent with the comments provided below.

I. Summary of the Surface Finishing Industry

The NASF has nearly 2,000 members that include metal finishing companies, metal finishing suppliers, and individual and professional members. The NASF represents the business, management, technical and educational programs as well as the regulatory and legislative advocacy interests of the surface finishing industry to promote the advancement of the North American surface finishing industry globally.

The surface finishing industry plays a vital role in the lives of consumers and in the nation's economic future. The industry's role in corrosion protection alone provides an estimated $200 billion annual economic benefit to the nation. Surface finishing ensures that the products people use every day last longer, work better, and look better.

Metal finishing operations are performed in two ways: 1) as a "captive" operation or department of a manufacturing company; and 2) on a job-shop basis where the work is performed under contract for the owner of the product or material that is to be finished. Although many manufacturers continue to operate metal finishing departments, the increasing trend is to subcontract this work to independent firms. This trend is a result of the high operating costs and a realization that metal finishing is both a regulatory and process specialty.

Over 80 percent of the job-shops in business employ fewer than 75 people, while nearly 40 percent employ fewer than 20 people. Most job-shop surface finishing firms are family-owned businesses, located in urban areas, with a large percentage of minority employees.

II. The Chromium Electroplating MACT Standard Has Been Effective in Controlling Chromium Emissions

When EPA promulgated the Chromium Electroplating MACT standard in 1995, the Agency estimated that the total chromium emissions from the industry would be reduced from 173 tons per year to five tons per year. Over the past 15 years, the metal finishing industry has implemented engineering controls and management practices to reduce chromium emissions significantly. Based on chromium emissions data from industry and state regulatory agencies, the total chromium emissions are now less than 0.5 tons annually.

As discussed below, EPA's conservative estimates of chromium emissions do not reflect the effective controls and management practices that the industry has implemented to reduce chromium emissions. For example, in an August 2006 staff report on proposed amendments to the state chromium emissions regulation, the California Air Resources Board (CARB) estimated that the total chromium emissions in California from the metal finishing industry were approximately four pounds each year. *CARB Staff Report on Proposed Amendments to Hexavalent Chromium Airborne Toxic Control Measures for Chrome Plating and Chromic Acid Anodizing Operations*. This is significant as the metal finishing operations in California easily represent more than ten percent of the national chromium electroplating and anodizing production in the U.S. Based on this estimate, national chromium emissions from the metal finishing industry would be significantly less than 0.5 tons per year.

In addition to the EPA regulatory controls on chromium emissions, other federal regulatory requirements have resulted in even further reductions in chromium emissions. In February 2006, OSHA promulgated a more stringent workplace exposure standard for hexavalent chromium of 5 ug/m^3. In response to this new standard, many metal finishing operations implemented additional controls and practices to minimize the release of chromium into the workplace and the environment. For example, chromium plating and anodizing operations added the use of mist suppressants or tank covers to the existing control equipment to reduce chromium emissions.

Another factor that reduced national chromium emissions was the recent economic downturn and increased global competition. Over the past decade, approximately 20 to 30 percent of metal finishing facilities have been forced to close. Fewer facilities generate fewer total chromium emissions.

Accordingly, the existing Chromium Electroplating MACT standard, a more stringent workplace exposure standard, unfavorable economic conditions and industry practices have effectively reduced chromium emissions from electroplating and anodizing operations to well below 0.5 tons per year.

III. Summary of EPA's Conservative Risk Modeling of Chromium Emissions

EPA identified 1,634 metal finishing facilities that are subject to the Chromium Electroplating MACT standard. In assessing the potential risk posed by chromium emissions from these facilities, EPA concluded that 54 of them (3.3% of the total) had a maximum individual risk (MIR) of 20 cancers in a million. See Attachment I. None of the facilities had an MIR of greater than 70. Provided below is an MIR summary for the 54 "highest risk" facilities identified by EPA in its conservative risk modeling.

0 of 1,634 facilities had an MIR of > 70
3 of 1,634 facilities had an MIR of > 50 (0.2%)
11 of 1,634 facilities had an MIR of $\geq$ 30 (0.7%)
54 of 1,634 facilities had an MIR of $\geq$ 20 (3.3%)

Based on this analysis, EPA estimated annual chromium emissions of approximately five tons. In addition, because a high percentage of chromium plating facilities are located in urban areas, EPA estimated that 14 million individuals were subject to a cancer risk of one in a million, but 90 percent of them were subject to a risk of less than ten in a million risk.

In making its estimates, EPA relied upon chromium emissions data from the National Emissions Inventory (NEI), estimated emissions from available facility data, and estimated emissions based on very conservative assumptions for model plants. As discussed below, these data do not reflect how effectively the industry has controlled chromium emissions, thereby leading EPA to exaggerate the potential risk from existing chromium emissions.

IV. EPA Over-Estimated Risks from Chromium Emissions

Upon a closer examination of the chromium emissions attributed to the 54 "highest risk" facilities, it appears that EPA has relied upon out-dated, flawed and unrepresentative data. All three of the facilities with risk based on NEI data appear to be errors, and include chromium emissions data from before the implementation of the 1995 Chromium Electroplating MACT standard. For example, the facility with the highest risk according to EPA was listed with chromium emissions of 11.8 pounds per year and an MIR of 70. Unfortunately, EPA used data from the facility before it had implemented emissions controls for the 1995 Chromium Electroplating MACT standard, because the address for the facility was its previous location. To comply with the 1995 standard, the facility moved to a new location and installed pollution control equipment for the chromium emissions. With those controls in place, the facility had annual chromium emissions of 0.0029 pounds in 2009. Corrected chromium emissions information for this facility and several of the other 54 "highest risk" facilities are provided below in Table IV-1.

In addition, chromium emissions data reported from individual facilities are significantly lower than EPA's estimated emissions and the emissions for the model plants. The NASF collected emissions data from these facilities and the information is summarized below in Table IV-1.

TABLE IV-1: Corrected Chromium Emissions Data from Highest Risk Facilities

1) Chrome Craft, Sacramento, CA (NEI Emissions of 11.8 lbs)

Tested emissions rate of 0.00012mg/AH with 11,141,142 amp hours for 2009 resulted in an annual total of 0.0029 pounds of chromium emissions.

In addition, the address listed on the EPA report for Chrome Craft was the old address. In response to the 1995 Chromium Electroplating MACT standard, Chrome Craft moved to a new location and installed appropriate pollution control equipment. Accordingly, the NEI data appears to be before the Chrome MACT was promulgated and before controls were installed.

2) Empire Hard Chrome (Kostner Ave.), Chicago, IL (Estimated Emissions of 31.2 lbs.)

The emissions rate for this facility was calculated using AP42 emissions factors for hard chrome and a control efficiency of 99.4%

2009	263.5 million AH	27.0 lbs
2008	240.7 million AH	24.7 lbs
2007	232.3 million AH	23.8 lbs
2006	257.7 million AH	26.4 lbs
2005	270.4 million AH	27.7 lbs

The average emissions rate over the past five years is 25.78 pounds which is over 16 % less than the estimate, so the MIR should be lower than the figure on the EPA list of "high risk" facilities.

3) Empire Hard Chrome (Wood St.), Chicago, IL (Estimated Emissions of 18.0 lbs.)

The emissions rate for this facility was calculated using AP42 emissions factors for hard chrome and a control efficiency of 99.4%

2009	33.9 million AH	3.5 lbs
2008	76.5 million AH	7.8 lbs
2007	68.9 million AH	7.1 lbs
2006	81.9 million AH	8.4 lbs
2005	88.5 million AH	9.0 lbs

The average emissions rate over the past five years is 7.2 pounds which is approximately 60 % less than the estimate, so the MIR should be lower than the figure on the EPA list of "high risk" facilities.

4) Industrial Hard Chromium Co., Newark, NJ (NEI Emissions of 11.9 lbs.)

Based on extensive chromium emissions testing conducted at the facility with the existing control technology, the facility's annual chromium emissions are less than one pound. It appears that the NEI data was collected before the Chrome MACT was promulgated and before controls were installed.

5) Denver Metal Finishing, Denver, CO -- Hard Chrome (Estimated Emissions of 0.71 lbs)

The following emissions for the facility were based on the facility's initial performance test and annual amp hours.

2009	2,226.9 AH	0.180 lbs
2008	2,292.8 AH	0.187 lbs
2007	4,402.7 AH	0.359 lbs
2006	8,216.0 AH	0.670 lbs
2005	4,197.0 AH	0.342 lbs

The average over the past five years is 0.3476 pounds which is approximately one half of EPA's estimated emissions.

6) Denver Metal Finishing, Denver, CO -- Decorative Chrome (Estimated Emissions of 0.40 lbs)

The following emissions for the facility were based on the facility's initial performance test and annual amp hours.

2009	212.6 AH	0.017 lbs
2008	297.9 AH	0.024 lbs
2007	170.3 AH	0.014 lbs
2006	207.6 AH	0.017 lbs
2005	113.9 AH	0.009 lbs

The average over the past five years is 0.016 pounds which is more than an order of magnitude less than EPA's estimated emissions.

7) Electro-Coating of Texas Inc., Houston, TX (Default Emissions of 9.26 lbs.)

This facility has five separate plating tanks and each is equipped with a three-stage wet mesh pad mist eliminator. The facility also uses polyethylene balls on the tanks to reduce chrome emissions even further. The annual chromium emissions for the facility are based on annual amp hours and emission factors that were based on initial source testing conducted in July 1995, August 1996 and May 2005. The following summarizes the facility's annual chromium emissions for the past five years.

Year	Amp Hours/Yr	Chromium Emissions/Yr
2005	47,498,753	1.412 lbs
2006	84,097,341	2.420 lbs
2007	56,509,717	1.603 lbs
2008	44,859,116	1.130 lbs
2009	38,313,669	0.952 lbs

The average annual chromium emissions for this facility based on the last five years of production is 1.503 pounds, which is more than 80% less than the default emissions of 9.26 pounds. Accordingly, The MIR should be significantly lower than the figure on the EPA list of "high risk" facilities.

8) Electrolizing, Inc., Los Angeles, CA (Default Emissions of 9.26 lbs.)

This facility has a Merlin hood control system that returns chromium emission back into the system rather than be emitted. The system has been in place for approximately 15 years with estimated annual chromium emissions of approximately 0.02 pounds.

9) Gull Industries (Cochran St.), Houston, TX (Default Emissions of 2.65 lbs.)

This facility has a scrubber with composite mesh pad system and uses fume suppressants for its decorative chrome plating operation. Using AP42 emissions factors with a removal efficiencies of 99.9% for the scrubber and 90% for the fume suppressant, the chrome emissions are 0.003 pounds for 2009. This is approximately three orders of magnitude lower than EPA's default estimate for this facility.

10) Quebecor Printing (now World Color), Mt. Morris, IL (NEI Emissions of 21.5 lbs.)

This facility only has two small hard chrome plating tanks, so it is very unlikely that the NEI data is representative of this facility. As with the other two facilities with NEI data, this appears to be erroneous and may be data before any controls were installed (and even that would appear to be an anomaly for this small facility).

11) U.S. Army Watervliet Arsenal, Watervliet, NY (Default Emissions of 9.26 lbs.)

The following emissions were based on the facility's initial performance test and amp hours.

2009 2.77 lbs
2008 2.28 lbs
2007 2.81 lbs
2006 2.68 lbs
2005 2.95 lbs
2004 2.30 lbs
2003 3.99 lbs

The average emissions for this facility over the past seven years is 2.83 pounds, which is only one third of the default emissions rate.

12) Economy Plating, Chicago, IL (Estimated emissions of 4.24 lbs.)

This facility is closed.

13) Delta Faucet, Chickasha, OK (Default Emissions of 2.65 lbs.)

This facility was closed in 2006. All of the plating equipment was sold and removed from the facility. The building is now being used as a warehouse.

14) K & L Anodizing, Burbank, CA (Default Emissions of 9.26 lbs.)

This is an anodizing facility that has never operated any hard chrome plating processes.

15) Two Additional Facilities

The following facilities have indicated that their emissions are significantly less than EPA's estimates.

Southwest United Industries, Tulsa, OK (Default Emissions of 9.26 lbs.)
Anoplate Corp, Syracuse, NY (Estimated Emissions of 9.26 lbs.)

The amount of chromium emissions attributable to the model plants are over-estimated and based on several overly-conservative assumptions. First, the estimates of 9.26 pounds of chromium emissions for hard chromium electroplating operations and 2.65 pounds for decorative electroplating operations are substantially higher than all but a handful of the largest facilities. Second, EPA attributed the 9.26 pound emission rate to a facility that had any hard chromium electroplating operations, even if the hard chromium electroplating was a small percentage of the chromium plating or anodizing operations at the facility. Finally, EPA attributed the highest emissions rate of 9.26 pounds to any facility for which it did not have complete information.

As a result of these flawed assumptions, EPA artificially inflated the number of facilities with hard chromium plating operations to over 1,200 of the 1,634 facilities instead of a more realistic estimate of less than 800 facilities. Accordingly, EPA compounded its errors, resulting in a substantial over-estimate of chromium emissions and the associated risk.

Further evidence of EPA's over-estimate is demonstrated by the fact that 19 of the 54 "highest risk" facilities are located in California. These 19 facilities represent a relatively small percentage of all of the chromium electroplating and anodizing facilities in California. Nonetheless, according to EPA, these 19 facilities are responsible for over 180 pounds of chromium emissions each year. This estimate for these facilities is significantly more than CARB's estimate of four pounds of chromium emissions from all plating and anodizing operations in California.

V. More Realistic Risk Analysis Based on Corrected Emissions Data

Based on the information provided above, EPA over-estimated chromium emissions by at least one order of magnitude (and possibly as much as two or three orders of magnitude). According to the EPA risk model, there is a linear relationship between chromium emissions and the associated risk. Therefore, if the chromium emissions from the selected facilities from the 54 "highest risk" facilities are substantially lower than the

EPA estimates, then the associated risk would be substantially lower and fewer individuals would be subject to potential risk from chromium emissions.

Based on the available data discussed above, 0.5 pounds of chromium emissions would be a conservative estimate of average annual facility emissions. Using the 1,634 facilities in database (although many of these are closed and are no longer operational) with an average of 0.5 pounds of chromium emissions, a national estimate would be 817 pounds or 0.409 tons of chromium emissions.

After correcting the chromium emissions data, very few, if any, facilities would be expected to have an MIR above one in a million. In addition, the number of individuals subject to risk associated with chromium emissions would be more than an order of magnitude less than EPA's overly conservative estimate of 14 million. In the proposed rule, EPA estimated that based on a more realistic estimate of risk the number of individuals exposed to a one in a million cancer risk from chromium emissions was less than 400,000. Arguably, based on the analysis discussed above, the number of individuals exposed to a one in a million risk could be considerably less than 400,000.

As part of the proposed rulemaking, EPA did, however, acknowledge that the residual risk from chromium emissions from chromium electroplating anodizing operations appears to be acceptable. Nonetheless, EPA requested comments on its more conservative risk modeling approach with 14 million individuals potentially exposed to a one in a million cancer risk from chromium emissions. Based on the information provided above, this conservative approach does not appear to be realistic or supported by the available data and analysis.

VI. Technology Review for the Chromium Electroplating MACT Standard

Since the promulgation of the 1995 Chromium Electroplating MACT standard and the 2004 amendments, no new control technologies have been developed or identified to control chromium emissions. Scrubbers, mist elimination, and composite mesh pad

systems are still the industry standard. In addition, mist suppressants and bath surface tension management are also effective methods to control chromium emissions.

EPA did, however, evaluate the use of add-on controls for existing control equipment, such as HEPA filters. EPA concluded that such additional controls were not cost-effective – estimating over $34 million per ton of chromium emissions reduced for all chromium facilities (and even more for smaller facilities). In addition, such add-on controls were not a feasible option because many facilities control chromium emissions effectively through the use of mist suppressants without the need for control equipment.

Another important consideration is the fact that the Chromium Electroplating MACT standard applies to both major and area sources. In fact, most, if not all, facilities subject to the Chromium Electroplating MACT standard are area sources. As a result, in-process bath surface tension and mist suppressants have proven to be effective and economical controls for many of the small plating operations that cannot afford the capital investment for pollution control equipment.

As part of the proposed rule, EPA has proposed to phase-out the use of perfluorooctyl sulfonate (PFOS) fume suppressants used to control chromium emissions within three years. While the PFOS fume suppressants are effective in controlling chromium emissions, they also pose potential persistence, bioaccumulative and toxic (PBT) concerns. Effective alternatives to PFOS fume suppressants are available for many chromium plating processes and more alternatives are being developed for other processes that can effectively control chromium emissions without posing PBT concerns. Accordingly, the proposed phase-out of PFOS fume suppressants is a reasonable requirement that is protective of the environment and human health.

Even if appropriate additional controls could be identified to address any potential residual risk, such requirements would trigger the Regulatory Flexibility Act to assess the potential small business impacts on the facilities subject to the Chromium Electroplating

MACT standard. In most cases, a requirement to install control equipment would not be necessary, practical or economically feasible.

VII. EPA's Residual Risk Standard

In previous residual risk rulemakings, EPA has promulgated rules based on no individual subject to a cancer risk of greater than 100 in a million. The courts have upheld EPA residual risk standards based on a risk of less than 100 in a million. The courts have also indicated that other considerations such as the availability of new control technologies or a large potentially exposed population could dictate whether a residual risk was acceptable. Based on these criteria, the proposed rulemaking for the Chromium Electroplating MACT standard appears justified. EPA does not, therefore, need to require any additional regulatory controls or requirements to protect the environment or human health.

VIII. The Proposed Housekeeping Provisions Need Clarification

EPA has proposed several new "housekeeping" requirements to facilitate the reduction and control of chromium emissions. While these provisions appear generally to be consistent with good management practices for chromium electroplating and anodizing operations, NASF requests that EPA provide the following clarifications for these requirements. Such clarifications will ensure that facilities can implement these housekeeping provisions effectively without overly broad and unnecessarily strict interpretations of the requirements.

Hexavalent chromium containing substances must be stored in a closed container in a closed storage area and use closed container when transporting the substance.

NASF requests clarification on EPA's definition of an enclosed storage area. The current practice of many facilities is to segregate these materials in a storage area within the building, and the material does not necessarily have to be stored in a cabinet or closet. These storage areas often include secondary containment or other spill and release

prevention measures. If more stringent requirements are applicable to these storage areas, then facilities would incur considerable costs to retrofit the facility or purchase and install drum storage cabinets that EPA should take into consideration. NASF does not, however, believe that such additional controls and costs are necessary.

Each affected tank, to minimize spills of bath solution that result from dragout must: (a) Install drip trays that collect and return to the tank any bath solution that drips or drains from parts as the parts are removed from the tank, OR (b) Contain and return to the tank all solution that drains or drips from parts as the parts are removed from the tank.

Metal finishing facilities employ a variety of methods to collect dragout from tanks. In many cases, the installation of drip trays to collect and return bath solution is impractical given the tank orientation and work practices at the facility. Drip trays can also inhibit employees' ability to manually move racks into and out of the process baths.

Facilities should have the option to collect dragout in the pits and sumps. The sumps would be periodically pumped out and processed through the wastewater treatment operation. While the solution that drains from parts and collected in a sump is "contained", it is not always practical for this material to be returned to the process, due to contamination with solutions from other process baths and contaminants that accumulate in the pits and sump. NASF requests that EPA consider an option that allows facilities to collect and treat and/or dispose of solution that drips or drains from parts as they are being removed from the tank.

Weekly Cleaning: "All surfaces" within the enclosed storage area, open floor area, walkways around affected tanks, or any surface potentially contaminated with hexavalent chromium that accumulates or potentially accumulates dust.

(a) Clean the surfaces using one or more of the following methods At least once every 7 days: (i) HEPA vacuuming; (ii) Hand-wiping with a damp cloth; (iii) Wet mopping; (iv) Other cleaning method approved by the permitting agency; OR (b) Apply a non-toxic chemical dust suppressant to the surfaces according to manufacturer's recommendations.

Metal finishing facilities employ general cleaning of work surfaces in areas that hexavalent chromium was used. The regulatory language that "*any surface* potentially

contaminated with hexavalent chromium" is overly broad and could include just about any surface in a metal finishing facility. NASF requests that this requirement be limited to surfaces in plating and storage areas in which hexavalent chromium was handled or used.

Otherwise, this provision could require weekly cleaning of light fixtures, ceiling trusses, walls, duct work, floor pits and any other conceivable surface within the plating facility. Cleaning such remote and elevated surfaces would require specialized equipment (*e.g.*, lifts, booms, *etc.*) and require significant compliance costs that EPA has not contemplated as part of this rule. NASF requests that EPA clarify that this requirement to include "all surfaces within the storage areas, open floor space, walkways around affected tanks, or readily accessible surfaces contaminated with hexavalent chromium dust."

In addition, this housekeeping provision indicates that a facility should implement one or more of the specific cleaning methods. While facilities should implement these cleaning methods effectively, this requirement should not be interpreted to include a strict performance standard such as no visible signs of any chromium. For example, it is not practical to remove all "chrome staining" in areas around the plating tanks (not to mention the fact that such stains do not pose any environmental or health concerns). NASF requests that EPA clarify this provision so that compliance can be achieved through reasonable and practical good management practices. Otherwise, the "how clean is clean" debate can present unnecessary administrative burdens and enforcement nightmares for both facilities and regulators.

This housekeeping provision also indicates that facilities should "[c]lean up, or otherwise contain, all spills of the substance within 1 hour of the spill." NASF requests that this requirement should be revised to include the following regulatory language: "Initiate clean up or containment of all spills of the substance within one hour of discovering the spill." This modest change can ensure that spills are promptly cleaned and contained without imposing an impractical burden on facilities.

All buffing, grinding, or polishing operations: Separate the operation from any affected electroplating or anodizing operation by installing a physical barrier; the barrier may take the form of plastic strip curtains.

The installation of physical barriers such as walls or curtains is not practical or economical feasible at many metal finishing facilities. The physical barriers could also obstruct employees' ability to move parts into and out of the buffing and polishing areas. Often the buffing, grinding and polishing operations at metal finishing facilities are positioned such that there is no "line of sight" to either the chrome electroplating or anodizing operations.

NASF is, therefore, requesting that EPA clarify the definition of "physical barrier" in the context of this requirement with the following regulatory language: "separate the operation from any affected electroplating or anodizing operation by a reasonable distance or other measure from the buffing, grinding, or polishing operations, or by installing a physical barrier such as plastic strip curtains. The intent of this housekeeping requirement appears to be the reduction of potential contamination associated with buffing, grinding and polishing activities, rather than total isolation and enclosure of these operations within the facility.

IX. Conclusion

Consistent with these comments, EPA has over-estimated the chromium emissions from plating and anodizing operations and the associated risk. The existing Chromium Electroplating MACT standard has been very effective in controlling chromium emissions and reducing risks to potentially exposed populations. Based on more up-to-date, accurate and representative chromium emissions data, the potential residual risk from chromium electroplating and anodizing operations is minimal. These factors as well as the additional environmental safeguards provided by the phase-out of PFOS fume suppressants and implementation of new housekeeping provisions (as clarified), indicate that no new controls are needed to protect the environment or human health from chromium emissions from chromium electroplating and anodizing operations.

On behalf of the National Association for Surface Finishing (NASF), we appreciate the opportunity to submit these comments on EPA's October 21, 2010 proposed National Emission Standards for Hazardous Air Pollutant Emissions: Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. If you have any questions, would like additional information, or would like to discuss these comments, please contact Christian Richter (crichter@thepolicygroup.com) or Jeff Hannapel (jhannapel@thepolicygroup.com) of The Policy Group on behalf of the NASF.