
State Water Resources Control Board

November 22, 2019

Order Recipients
State Water Resources Control Board

APPROVAL OF EXTENSION OF DEADLINES FOR SUBMITTING SITE-SPECIFIC CHROME PLATING QUESTIONNAIRES AND WORK PLANS TO DETERMINE THE PRESENCE OF PER- AND POLYFLUOROALKYL SUBSTANCES (PFAS) SUBJECT TO THE OCTOBER 11, 2019 STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2019-0054-DWQ

This letter serves to approve a 60-day extension for submitting the questionnaires and work plans for all recipients of State Water Board Order WQ 2019-0045-DWQ. The deliverable due dates will be extended as follows.

- Questionnaires due January 24, 2020
- Work plans due March 31, 2020

The State Water Resources Control Board (State Water Board) issued Water Code Sections 13267 and 13383 Order WQ 2019-0045-DWQ (Order) for the Determination of the Presence of Per- and Polyfluoroalkyl Substances (PFAS) at Chrome Plating Facilities on October 11, 2019. The Order includes requirements for submitting a questionnaire or a work plan and final sampling and analysis report to the applicable Regional Water Quality Control Board (Regional Water Board) for a one-time preliminary site investigation of PFAS impacts to soil, groundwater, stormwater runoff, and/or effluent wastewater for the 271 chrome plating facilities identified in Attachment 1 of the Order. The Order states that a questionnaire must be submitted no later than November 25, 2019; if the questionnaire is not applicable to the facility, the work plan must be submitted no later than January 31, 2020. However, the Order allows a time extension for good cause.

On November 14, 2019, the Metal Finishing Associations of Southern and Northern California (MFASC and MFANC, respectively) submitted a letter to the State Water Board requesting a 90-day extension to the compliance deadlines for the questionnaire and work plan for 74 chrome plating facilities. The letter indicates that the extension was requested to allow facilities to conduct further reviews to complete the questionnaire accurately, to allow for additional time for the MFASC and MFANC to develop a “model

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

work plan,” and to provide time for continued engagement and discussions to provide more clarity on the Order requirements.

While a 90-day extension was requested, 60 days should be sufficient to complete the order requirements.

If you have any questions or need additional information, please contact Wendy Linck at Wendy.Linck@waterboards.ca.gov or (916) 323-0888, or Amanda Magee at Amanda.Magee@waterboards.ca.gov or (916) 323-0681.

Sincerely,



Eileen Sobeck
Executive Director

Attachment:

MFASC and MFANC, November 14, 2019 Due Date Extension Request Letter:
“Request for Extension – Order WQ 2019-0045-DWQ”

cc: Annalisa Kihara, State Water Board
Wendy Linck, State Water Board
Steve McMasters, State Water Board
Amanda Magee, State Water Board
Shahla Farahnak, State Water Board
Charles Reed, North Coast Regional Water Board
Greg Bishop, Central Coast Regional Water Board
Alec Naugle, San Francisco Bay Regional Water Board
Dr. Arthur Heath, Los Angeles Regional Water Board
Adnan Siddiqui, Los Angeles Regional Water Board
Chris Flower, Central Valley Regional Water Board
Scot Stormo, Colorado River Basin Regional Water Board
Mona Behrooz, Santa Ana Regional Water Board
Sarah Mearon, San Diego Regional Water Board
Justin Guzman, MFASC
Bobbi Burns, MFANC



November 14, 2019

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RE: Request for Extension – Order WQ 2019-0045-DWQ

The Metal Finishing Association of Southern California [MFASC] and the Metal Finishing Association of Northern California [MFANC] request an extension of the compliance deadlines set forth in the Water Code Section 13267 and 13383 Order for the Determination of the Presence of Per-and Polyfluoroalkyl Substances at Chrome Plating Facilities Order WQ 2019-0045-DWQ [Order] dated October 25, 2019 that the State Water Resources Control Board [Water Board] has distributed to California chrome plating facilities.

MFASC and MFANC are actively engaged with the Water Board in an effort to develop an understanding of the requirements of the Order, to provide guidance to our members, and to facilitate effective and efficient compliance. Together, MFASC and MFANC have 74 member facilities that have received this Order. The list of those members is attached to this letter.

Our engagement has included group teleconferences with Water Board personnel on September 30 and November 12, as well as the calendaring of the next teleconference for November 18. This dialogue is productive, has highlighted several issues and has also led to plans for webinars and other communications.

Within this context, MFASC and MFANC are requesting that the November 25, 2019 deadline for facilities to complete and submit the questionnaire required by the Order be extended 90 days, with a corresponding 90-day extension in the January 31, 2020 deadline for facilities to submit their work plans.

There are several reasons for our request for an extension:

The Order and its Requirements are New for the Chrome Plating Industry

The Order is new and unprecedented, with MFASC and MFANC becoming aware of the plan to issue an order on September 30 and having had our first opportunity to view the text of the actual Order on October 28.

Costs and Burdens of the Order Are Substantial

Chrome plating facilities are concerned about the resources available to develop work plans and test for PFAS in the timeframe outlined in the Order. As compared to the airports and landfills that were the subject of the previous orders, the surface finishing industry is made up primarily of small, family-owned

businesses that used very small amounts of PFAS [ounces] in their fume suppressants to reduce hexavalent chromium emissions.

Beginning in 1995, the U.S. Environmental Protection Agency recommended the use of PFOS as a fume suppressant in the chromium electroplating process. It is estimated that one third of surface finishing facilities have chromium electroplating processes, but not all of these may have used PFOS fume suppressants. The amounts of PFOS used in the plating industry represented a tiny fraction of all commercial uses. It is estimated that the use of PFOS in the surface finishing industry represented less than one half of one percent of global PFOS use.

The Order impacts all chrome plating facilities. However, the size of the facilities, activities, and staff varies significantly from the largest to the smallest operation. Smaller facilities have fewer staff, in most cases no dedicated environmental personnel, and neither the technical expertise nor training to adequately accomplish the work. Therefore, they must pay the costs of outside consultants they will need to hire for this purpose. The projected costs of complying with the Order can be crippling to many chrome plating shops.

It is also important to note that the size of the average chrome plating facility and the cumulative impact of several recent new environmental requirements means that facilities do not have the financial resources available to hire a consultant and conduct testing immediately as required by the Order. Examples of the new requirements are the extensive obligations imposed by the South Coast Air Quality Management District in Rule 1469 and the pending new burdens that will be imposed by pending Rule 1480.

The industry is subject to very high costs for environmental, health, and safety compliance. Typically, the total compliance operating costs for an average job shop is approximately 6.5 percent of sales, or nearly \$200,000 for a company with a sales volume of \$3 million.

Scope of the Order Needs to Reflect Historical Use of PFAS

Based on the surface finishing industry's experience with PFAS, if PFAS is released it is most likely found in effluent discharges and, to a much lesser extent, stormwater runoff. In addition, chrome plating shops do not routinely have groundwater monitoring wells. It is very unlikely that PFAS released from a chrome plating shop would be found in groundwater or surface soils.

Accordingly, the Order should reflect this reality and require sampling of only effluent discharges and stormwater runoff. Sampling groundwater and surface soils should only be required where there is evidence to strongly suggest the need. This will help to reduce the costs and burdens of the Order, while still allowing the Water Board to collect sampling data.

Additional Time Needed to Develop a Model Work Plan

The additional time will also help enable MFASC and MFANC, working together with our national partner the National Association of Surface Finishers [NASF], to develop and present to the Water Board and regional boards a model work plan that facilities can customize for their individual use.

An extension of the deadline in the Order will also provide time for helpful engagement, discussions and webinars that should provide critical clarity for facilities on several items.

Limited Capacity of Accredited Labs

Another piece of information that is important for chrome plating facility compliance is confirmation of the specific labs that are appropriately accredited and are available to conduct the sampling. It is important to time the work plans so that there is sufficient capacity of available labs to meet the demand of more than 200 chrome plating facilities as labs devote significant time and resources to the sampling that is required of the airports and landfills.

Language of Order Is Ambiguous and Subject to Interpretations

Some of the language of the Order is ambiguous and subject to several reasonable interpretations. For instance, it is not clear that a facility endeavoring to complete the questionnaire is able to respond that it does not have and is not able to obtain the requested information. It is also not clear that a facility is able to include caveats in its response or provide supplemental information. In addition, there is no place on the questionnaire to state \ check-off that chrome plating has not occurred at the facility. It is important that all affected chrome plating facilities have a clear understanding of each of these issues and others at the inception of the process that the Order initiates.

Questionnaire Is Important and Has Potential Consequences

Chrome plating facilities will need to devote significant additional resources and make a dedicated effort to find and review information in order to complete the questionnaire with definitive answers as to whether PFAS-containing materials have been used, stored or released over the decades. The answers to the questionnaires are required to be submitted under penalty of perjury and can have serious unintended consequences for a facility, potentially leading individuals and the public to unfairly make conclusions that facilities should be responsible and/or liable for cleanup, even though no regulatory levels have been established.

For these reasons, MFASC and MFANC believe that the additional time provided by our requested extension will be productive and effective, enabling further dialogue at the inception of the efforts of chrome plating facilities to comply and furthering the ability of the state Water Board and regional boards to develop the desired information on the presences of PFAS in drinking water.

Sincerely,

Justin Guzman

Justin Guzman,
MFASC President
Aircraft X-Ray Laboratories

Bobbi Burns

Bobbi Burns,
MFANC President
Global Plating

Enclosure

74 MFANC and MFASC Members on SWRCB List of Facilities Receiving Order WQ 2019-0045-DWQ

Regional Board	Facility Name	Address	City	Zip	County	GeoTracker Global ID
San Francisco Bay	Babbitt Bearing Co Inc	1170 N 5th Street	San Jose	95112	Santa Clara	T10000013405
San Francisco Bay	Electro-Coatings Of California Inc	893 Carleton Street	Berkeley	94710	Alameda	SLT2O363253
San Francisco Bay	Fryer Industries, Inc.	1073 34th Street	Oakland	94608	Alameda	T10000013409
San Francisco Bay	Global Plating, Inc	44620 Grimmer Blvd	Fremont	94538	Alameda	T10000013410
San Francisco Bay	High Luster Metal Finishing	2466 American Avenue, Unit C	Hayward	94545	Alameda	T10000013416
San Francisco Bay	Roll Technology West	900 Loveridge Road	Pittsburg	94565	Contra Costa	T10000013419
San Francisco Bay	SJ Valley Plating Inc	491 Perry Court	Santa Clara	95054	Santa Clara	T10000013420
San Francisco Bay	Teikuro Corp	31499 Hayman	Hayward	94544	Alameda	T10000013422
Los Angeles	A2Z Plating	1467 S Sunol Dr	Los Angeles	90023	Los Angeles	T10000013424
Los Angeles	Aaa Plating & Inspection, Inc	424 Dixon St	Compton	90222	Los Angeles	T10000013425
Los Angeles	Accurate Plating Co	2811 Alcazar St	Los Angeles	90033	Los Angeles	T10000013429
Los Angeles	A-H Plating Inc	1837 Victory Place	Burbank	91504	Los Angeles	SL603798588
Los Angeles	Aircraft X Ray Laboratories Inc	5216 Pacific Blvd	Huntington Park	90255	Los Angeles	T10000013432
Los Angeles	Alco Cad-Nickel Plating Corp	1400 Long Beach Avenue	Los Angeles	90021	Los Angeles	T10000013433
Los Angeles	Anaplex Corporation	15447 Garfield Ave	Paramount	90723	Los Angeles	T10000013437
Los Angeles	Aviation Repair Solutions Inc	1480 Canal Ave Suite A	Long Beach	90813	Los Angeles	T10000013447
Los Angeles	B & C Plating Co	1507 S Sunol Dr	Los Angeles	90023	Los Angeles	T10000013448
Los Angeles	Barry Ave Plating Co Inc	2210 Barry Ave	Los Angeles	90064	Los Angeles	T10000013449
Los Angeles	Bowman Plating Co Inc	2631 E 126th St	Compton	90222	Los Angeles	T10000013451
Los Angeles	Brite Plating Co Inc	1313 Mirasol St	Los Angeles	90023	Los Angeles	T10000013452
Los Angeles	Cal Electroplating Inc	3510 E Pico Blvd	Los Angeles	90023	Los Angeles	T10000013456
Los Angeles	California Technical Plating	11533 Bradley Avenue	San Fernando	91340	Los Angeles	T10000013457
Los Angeles	Chromal Plating & Grinding Co.	1748 Workman St	Los Angeles	90031	Los Angeles	SL0603764270
Los Angeles	Chromplate	1127 W Hillcrest Blvd	Inglewood	90301	Los Angeles	T10000013463
Los Angeles	Connell Processing Inc	3080-3094 N Avon St	Burbank	91504	Los Angeles	T10000013464
Los Angeles	E M E Inc	431 E Oaks St	Compton	90221	Los Angeles	T10000013471
Los Angeles	Electrolizing Inc	1947 Hooper Ave	Los Angeles	90011	Los Angeles	T10000013473
Los Angeles	Hawker Pacific Aerospace	11240 Sherman Way	Sun Valley	91352	Los Angeles	T10000013489
Los Angeles	Jenco Plating Inc	9536 Rush St	South El Monte	91733	Los Angeles	T10000013496
Los Angeles	K L Anodizing Corporation	1200 S Victory Blvd	Burbank	91502	Los Angeles	T10000013497
Los Angeles	LMDD Enter. Inc., dba Dixon Hard Chrome	11645 Pendleton St	Sun Valley	91352	Los Angeles	T10000010400
Los Angeles	Metal Finishing Marketers Inc	1401 Mirasol St	Los Angeles	90023	Los Angeles	T10000013504
Los Angeles	Metal Surfaces Inc	6048-60 Shull St	Bell Gardens	90201	Los Angeles	T10000013505
Los Angeles	Morrell's Electro Plating, Inc	432 E Euclid Ave	Compton	90222	Los Angeles	T10000013510
Los Angeles	Multichrome Co Inc	1013 W Hillcrest Ave	Inglewood	90301	Los Angeles	T10000013511
Los Angeles	Nasmyth Tmf, Inc. (Burbank Facility)	3401 Pacific Ave	Burbank	91505	Los Angeles	T10000013512
Los Angeles	Pemaco Metal Processing Corp.	2125 Lemon St.	Alhambra	91803	Los Angeles	SL603799182
Los Angeles	Pentrate Metal Proc	3517 E Olympic Blvd	Los Angeles	90023	Los Angeles	T10000013515
Los Angeles	Quaker City Plating & Silversmith Ltd	11729 E Washington Blvd	Whittier	90606	Los Angeles	T10000013522

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Los Angeles	S & K Plating Inc	2727 N Compton Ave	Compton	90222	Los Angeles	T10000013525
Los Angeles	Size Control Plating Co	13349 Temple Ave	La Puente	91746	Los Angeles	T10000013529
Los Angeles	Sonic Plating (Gardena)	1930 W Rosecrans Ave	Gardena	90249-2930	Los Angeles	T10000013530
Los Angeles	Sonic Plating (Santa Fe Springs)	13002 Los Nietos Rd	Santa Fe Springs	90670	Los Angeles	T10000013531
Los Angeles	Southwest Plating	1344 Slauson	Los Angeles	90044	Los Angeles	T10000013532
Los Angeles	Stutzman Plating Co	5025-37 W Exposition Blvd	Los Angeles	90016	Los Angeles	T10000013536
Los Angeles	Sunvair, Inc.	29145 The Old Road	Valencia	91355	Los Angeles	T10000013537
Los Angeles	Superior Metal Finishing (Gardena)	1733 W 134th St	Gardena	90249	Los Angeles	T10000013538
Los Angeles	Tool & Jig Plating Co	7635 S Baldwin Pl	Whittier	90602	Los Angeles	T10000013543
Los Angeles	V & M Plating	14024 South Avalon Boulevard	Los Angeles	90061-2692	Los Angeles	T10000008449
Los Angeles	Valence Surface Technologies dba Coast Plating	128-150 W 154th St	Gardena	90248	Los Angeles	T10000013546
Los Angeles	Valley Plating Works Inc	5900 E Sheila St	Commerce	90040	Los Angeles	T10000013548
Los Angeles	VM Aerospace	14024 S Avalon Blvd	Los Angeles	90061	Los Angeles	T10000013552
Central Valley (Fresno)	Commercial Electro Plating	1937 S Cherry Ave	Fresno	93721	Fresno	T10000013556
Central Valley (Fresno)	Meclec Plating/Metal Finishing	5945 E Harvard Ave	Fresno	93727	Fresno	T10000013558
Central Valley (Fresno)	Sum Inc dba AC Plating	317 Mt Vernon	Bakersfield	93307	Kern	T10000013562
Central Valley (Fresno)	Valley Chrome Plating Inc	1000 Hoblitt Ave	Clovis	93612	Fresno	T10000013563
Central Valley (Sac)	Metal Finishing Group Llc	8290 Alpine Ave	Sacramento	95826	Sacramento	T10000013572
Central Valley (Sac)	Modesto Plating	436 Mitchell Rd Ste D	Modesto	95354	Stanislaus	T10000013573
Central Valley (Sac)	San Joaquin Chromeworks	910 Black Diamond Unit B	Lodi	95240	San Joaquin	T10000013576
Central Valley (Sac)	Sherms Custom Plating	2140 Acoma St	Sacramento	95815	Sacramento	T10000013577
Central Valley (Sac)	STA/Chrome Craft	5950 88th Street	Sacramento	95828	Sacramento	T10000013578
Santa Ana	All Metals Processing Of Oc Inc	8401 Standustrial St	Stanton	90680-2688	Orange	T10000013585
Santa Ana	Alumin-Art Plating Co Inc	803 W State St	Ontario	91762	San Bernardino	T10000013586
Santa Ana	Anodyne Inc	2230 S Susan St	Santa Ana	92704	Orange	T10000013588
Santa Ana	Black Oxide Industries Inc	1745 Orangethorpe Park	Anaheim	92801	Orange	T10000013590
Santa Ana	Coastline Metal Finishing Inc	7061 Patterson Dr	Garden Grove	92841	Orange	T10000013597
Santa Ana	Embee Processing	2136 S Hathaway St	Santa Ana	92705	Orange	T10000013603
Santa Ana	Hixson Metal Finishing	816-829 Production Pl	Newport Beach	92663	Orange	T10000013612
Santa Ana	Kryler Corp	1217 E Ash Ave	Fullerton	92831-5019	Orange	T10000013613
Santa Ana	Omni Metal Finishing Inc	11665-11688 Coley River Cir	Fountain Valley	92708	Orange	T10000013619
Santa Ana	Precision Anodizing & Plating Inc	1601 N Miller St	Anaheim	92806-1417	Orange	T10000013622
Santa Ana	Superior Plating	1901 E Cerritos Ave	Anaheim	92805	Orange	T10000013627
Santa Ana	Triumph Processing, Embee Div, Inc. (Santa Ana)	2136-68 S Hathaway St	Santa Ana	92705	Orange	T10000013629
San Diego	Sheffield Platers Inc	9850 Waples St	San Diego	92121	San Diego	T10000013640