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Compliance Assistance Resources

An important service of the National Metal Finishing Resource Center (NMFRC) is to provide industry with tools needed to comply with environmental regulations. To meet this objective, during the past three years, the NMFRC has developed a set of on-line resources, including:

- Plain Language Guide
- State Regulatory Locator
- Federal Regulations
- Regulatory Updates
- Regulatory Determinations
- Technical Resources

You can access these items by going to the NMFRC home page (<http://www.nmfr.org>) and clicking "Compliance Assistance" on the left menu.

Plain Language Guide

Regulations are difficult to understand because of their format, wording and the writing style employed. Recently, President Clinton directed authors of regulations to make them more understandable (Fig. 1). This action appears to be a very positive step, but metal finishers must now contend with regulations written under a less

Plain Language Rule

On June 1, 1998 President Clinton wrote "By January 1, 1999, use plain language in all proposed and final rulemakings published in the *Federal Register*, unless you proposed the rule before that date. You should consider rewriting existing regulations in plain language when you have the opportunity and resources to do so." To motivate regulators, Vice President Gore instituted a monthly award — "a button with a turkey head on it and a line through it" — to the federal employee with the best written regulation. The award is termed the Gobblygook Elimination Prize. The first plain language award went to Marthe Kent of OSHA on June 30, 1998. Marthe received the award for an upcoming OSHA regulation on dip tanks. Here's the section of the old and new regulation the Vice President read as part of the ceremony.

BEFORE:

1910(94)(d) (1) General. (i) This paragraph applies to all operations involving the immersion of materials in liquids, or in the vapors of such liquids, for the purpose of cleaning or altering the surface or adding to or imparting a finish thereto or changing the character of the materials, and their subsequent removal from the liquid or vapor, draining, and drying. These operations include washing, electroplating, anodizing, pickling, quenching, dyeing, dipping, tanning, dressing, bleaching, degreasing, alkaline cleaning, stripping, rinsing, digesting, and other similar operations.

AFTER:

1910.122

(a) When does this rule apply?

- (1) This rule applies to operations using a dip tank containing any liquid other than water:
 - (i) To clean an object;
 - (ii) To coat an object;
 - (iii) To alter the surface of an object; or
 - (iv) To change the character of an object.
- (2) This rule also applies to drying or draining an object after dipping.

Fig. 1—President Clinton's Plain Language Rule.

user-friendly policy. To assist with this problem, the NMFRC is developing a "Plain Language Guide" that will help you understand water, air, solid waste and other environmental regulations. Several of these new tools will be operational by October 1, 1998.

State Regulatory Locator

Some states (more and more as time goes on) have made regulations available over the web. Finding them is another matter. On the NMFRC, you can call

up a touch-sensitive map (Fig. 2). Clicking on any state will bring up a summary of that state's Internet resources, including links to various state offices, and state regulations. To keep this information current, the NMFRC has created on-line input forms that state agencies use for updating.

Federal Regulations

The NMFRC has assembled an extensive set of laws and regulations. These are presented in both summary and full-text forms, and are organized by statute. For example, click on "Effluent Guidelines" and you see a complete list of all current Clean Water Act industrial discharge regulations.

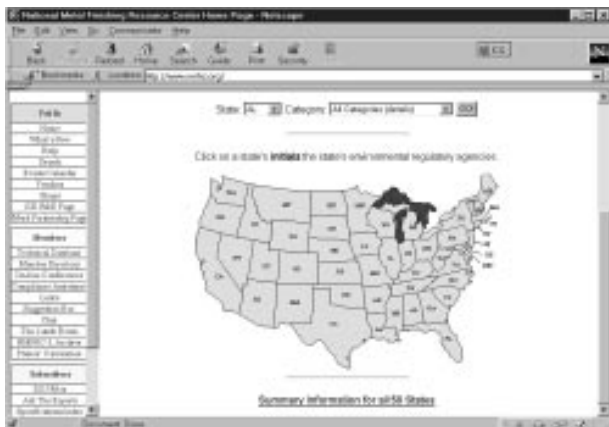


Fig. 2—State Regulations Locator.

Regulatory Updates

What's happening in Washington and elsewhere that might affect metal finishing operations and waste disposal options? Find out the headlines, and find the links to other resources on the web to explore the issues in greater depth. This collection of articles is updated several times each month and includes information from the AESF/NMFRC/MFSA Government Relations office, IPC, EPA and other sources.

Regulatory Determinations

Does a particular regulation apply to your facility? A determination of regulatory applicability made in Region III, for example, is supposed to be taken into account when evaluating a similar situation in Region V. In practice, however, such information is often difficult to find. The NMFRC has created a unique resource—a collection of determination letters and other relevant documents going back over a decade with

rulings affecting the metal finishing industry. The collection is full-text searchable, to help you locate items that may be relevant to your situation.

Technical Resources

The NMFRC has more than 5,000 articles, reports and conference papers on-line. The database includes past issues of *Plating and Surface Finishing* and AESF Week and SUR/FIN® papers. Many of these materials deal with environmental regulatory issues or provide information on waste treatment, disposal and pollution prevention. The technical database is updated monthly.

Common Sense Initiative/ Strategic Goals

In addition to the previously mentioned resources, the NMFRC is host to the Common Sense Initiative's (CSI) Strategic Goals web site. In addition to receiving program information, users can access the data submitted by participating firms.

There is also a benchmarking tool that permits companies to compare themselves to the environmental performance of the CSI Goals firms.

Additional Information

For additional information on the NMFRC, contact George Cushnie (e-mail: geoc@nmfrc.org or phone: 703/264-0039). **P&S**

Bibliography

1. Clinton, William, Presidential Memorandum on Plain Language, The White House, Washington, June 1, 1998, Memorandum for the Heads of Executive Departments and Agencies, Subject: Plain Language in Government Writing (<http://www.plainlanguage.gov/cites/memo.htm>).
2. Cindy Skrzycki, "Gore's Plain-Spoken Directive; Order Calls For Clarity In Federal Communications," *Washington Post*, Tuesday, June 2, 1998.