



## President's Corner

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### MP&M Lands with a Thud

In the past two months, metal finishers in the United States have had an alternative topic to discuss instead of the presidential election. The Metal Products & Machinery Rule (MP&M) proposed by the U.S. Environmental Protection Agency (EPA) after some five years in the making has dropped with a thud on the finishing industry. Its pre-publicity hit in November, just after the debated election, becoming official with its publication in the December *Federal Register*.

For the past five years that MP&M has been under development, our government relations office has been monitoring its progress. Repeatedly, technical information has been provided to the agency through the GR office and a number of well-respected, knowledgeable industry representatives. In spite of our input, however, the EPA has elected to take an extremely aggressive regulatory posture. As a result, shock waves have been running through the finishing community and the alarm bells have been sounded.

You may have received the November 15 broadcast FAX alert from AESF's government relations office. MP&M's proposed effluent limitations were posted the same day on [www.aesf.org](http://www.aesf.org) and remain there now. If you haven't seen the list of metals and the scary numbers that accompany them, I suggest that it's in your best interests to take a look now. Sit down first.

Environmentally conscious, informed and *practical* people in the industry—such as AESF's Technical Director Frank Altmayer, CEF—assert that the MP&M numbers are impossible to achieve with the technology cited in the proposal. Be sure to read Frank's comments in this issue.

Frank and other knowledgeable people believe that if the MP&M numbers stay as proposed, many finishing companies will go out of business, start-up companies or

rule. For more than 22 years, the AESF/EPA Conference has been a timely forum for debate of proposed regulations and other issues of concern to the industry. The conference and its accompanying exhibit fall in the middle of the 120-day comment period. Get all the details on MP&M at the conference. An entire session (Session E, Tuesday morning at 9 a.m.) will be devoted to the subject. Key speakers will present a range of viewpoints in the debate over MP&M. You'll hear EPA officials who are the

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expanding shops (counting as new point sources) will be quashed, and more finishing jobs will be sent outside the U.S. Obviously, Canada and Mexico may stand to gain business—at least in the short run—but finishers there are nervous that whatever the U.S. does, their country is likely to follow suit.

So, what do we do now? This is definitely the time to attend AESF Week. Its anchor event—the Conference for Environmental Excellence—is co-sponsored by the same EPA that has released the proposed MP&M

primary authors of the measure; a nationally-recognized POTW official and treatment expert; and industry thinkers who'll give their preliminary analysis of the regulation. This is your opportunity to learn more about MP&M, ask questions and voice opinions.

Elected officials and partisan politics come and go, but unless the MP&M comment period is used wisely and members of the industry are very persuasive with the facts, the rule in its proposed form will be around to haunt us for a very long time. *P&SF*