Innovative Regulatory Change Promotes Environment & the Bottom Line

The finishing industry is a leading proponent of incremental regulatory changes to promote environmentally beneficial results. The industry continues to work collaboratively with the EPA on numerous regulatory, policy and innovation initiatives designed to advance the use of best management practices on the shop floor. Two examples are instructive:

F006 Sludge Reform

Metal finishing processes generate metal hydroxide sludge as a product of tightly controlling their wastewater discharge to municipal treatment works. The sludge—designated by EPA as "F006"—must be managed under the Resource Conservation and Recovery Act (RCRA) as a "listed" hazardous waste. Current federal waste regulations create barriers to recycling this material, so most of this sludge is disposed in landfills, despite the fact that it contains valuable metals that could be recovered.

Our view is that federal waste regulations should address environmental protection as well as create incentives for developing innovative recycling and waste treatment techniques for industrial wastes. The bottom line is that industry practices to minimize waste and control processes have changed over two decades, and any risks from metal finishing sludge have been dramatically reduced. In light of this, we have developed over the course of two Administrations a new framework to provide more favorable regulatory treatment to this material if it is recycled or if it is generated from plants that use innovative practices to make potentially problematic constituents safer.

Chrome MACT Amendments

Under the Clean Air Act, EPA developed stringent technology-forcing requirements in the mid 1990's to control chromium air emissions from metal finishing facilities. The industry has since worked with EPA's Office of Research & Development and the Office of Air & Radiation to test whether a less expensive chemical additive in production would achieve the same emission reductions as conventional, "end-of-pipe" filters or scrubbers. Research and practice show that it indeed can! In response to this new research, EPA is now working to finalize "targeted" amendments to the chrome air regulations that would, among other things, allow facilities flexibility in how they meet their emission requirements.

Under the new approach, the emission limits for the industry would stay the same, but facilities could legally use chemical fume suppressants in lieu of mechanical control equipment to meet them. We call on Congress to continue its support of EPA's regulatory flexibility initiatives that remove current regulatory barriers, improve recycling opportunities for wastes like F006 sludge, provide greater operational flexibility and reduce industry costs associated with innovative pollution control practices. (Source: Surfice Finishing Industry Council.) ***P&SF***