



Industry to Assist with Pentagon's Coatings Technology Session this Fall



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Success Prompts Department of Defense to Plan Second 2006 Event on Surface Finishing Technologies – Industry Experts to Present and Discuss Issues

After a successful conference recently in Washington DC on challenges for surface finishing technologies in the defense arena, the Pentagon's Strategic Environment R&D Program (SERDP) is planning a follow up session this fall with a more specific focus on applying commercial finishing successes to "clean" technologies for defense uses.

The event will be part of SERDP's larger annual Environmental Technology and Research Symposium, which typically attracts more than 800 attendees, and will focus on best approaches for reducing potentially hazardous materials in defense weapons systems and facilities. The event will invite participation from key industry experts from the AESF, aerospace, automotive and other communities to present and provide various perspectives on how emerging commercial materials and processes can be modified and used by the Department of Defense.

The preliminary program will include Dr. Don Snyder (Atotech), Steve Gaydos (Boeing), Keith Legg (Rowan Technologies), John Beatty (Army Research Lab), Peter Gallerani (Integrated Technologies), Christian Richter (The Policy Group) and aerospace consultant Sheldon Toepke. More information will be forthcoming.

Industry Engages OSHA, Discusses Options on Chrome PEL Legal Issues

As most finishers know, OSHA issued its new final workplace exposure standard for hexavalent chromium in February. The new standard raises the originally proposed limit of $1 \mu\text{g}/\text{m}^3$ to $5 \mu\text{g}/\text{m}^3$, sets a regulatory "action level" at $2.5 \mu\text{g}/\text{m}^3$ and provides an exemption from the regulatory requirements for operations with exposures: (1) below $0.5 \mu\text{g}/\text{m}^3$ or (2) less than 30 calendar days a year. These new regulatory requirements became effective on May 30, 2006.

While OSHA has acknowledged that the finishing industry's efforts were primarily responsible for moving the PEL five times higher than its proposed rule, most are fully aware that compliance challenges remain for many in the metal finishing industry. Government Relations has responded to the new regulation with a wide range of activities, including:

- **Litigation** – pursuing a legal challenge to OSHA's new standard;
- **Settlement** – exploring possible "out of court" settlement options with OSHA that would waive full-time respirator requirements in exchange for selected best management practices and clarify key provisions for finishers;
- **Compliance** – identifying the compliance requirements that must be met by the regulatory deadlines, and
- **Education** – assisting the industry in assessing exposures and educating companies on implementing the regulatory requirements.

As litigation on the final rule proceeds, facilities must still meet the regulatory requirements of the new OSHA Chrome PEL by the pending compliance deadlines – November 27, 2006 (for facilities with

20 or more employees) and by May 30, 2007 (for facilities with fewer than 20 employees).

Strategies for addressing the regulation at the plant level and compliance clarifications will be the topic of technical sessions at SUR/FIN 2006 in Milwaukee, September 18-21. Plan to attend this important presentation on the new OSHA Chrome PEL.

Finishers Completing EPA Air Surveys for New Rule – EPA to Address SURFIN on Outlook for Next Chapter of Air Regulations

Government Relations has invited key EPA air emissions staff to address industry at SUR/FIN in Milwaukee, September 18-20, 2006. Dr. Donna Lee Jones, project manager for EPA's emerging proposal on finishing air emissions, will provide a summary of the Agency's preliminary views from information submitted in the surveys. This presentation will be a tremendous opportunity for the industry to understand EPA's direction for the regulation and to provide further input to EPA on plating and polishing operations.

The Policy Group will continue to engage EPA officials in determining whether regulatory controls are needed for emissions from plating and polishing operations or whether a set of best management practices for the industry may be more appropriate. If companies have questions about the questionnaire or the development of the new area source rule, they can contact EPA's Dr. Donna Lee Jones at Jones.DonnaLee@epa.gov, the EPA contractor's help line at: epa-platingsurvey-help@rti.org, or the industry Government Relations office at jhannapel@thepolicygroup.com or crichter@thepolicygroup.com.