



Regulatory Update January 2000

January, 2000 Compliance Reminder

February 1: OSHA 200 logs (injuries and illnesses) must be posted during the month.

March 1: EPA Section 312 (Tier II) reports are due. Facilities that store 10,000 lbs. or more of any hazardous chemical on-site at any one time or threshold planning quantities of Extremely Hazardous Substances must file. Some states have lower reporting thresholds - if you'd like us to check what your state requirements are, please call. Even numbered year - that means Large Quantity Generators must file a report with their state. Small Quantity Generators should check and see if their state requires one, too.

July 1: EPA Section 313 (Form R) reports are due.

Some Annual Training Requirements for Safety Meetings: Hearing Conservation (and annual audiograms); Fire Extinguisher Training; Review of Lockout Procedures and/or Electrical Safety; Employee Rights to Exposure and Medical Records Review; Annual Respirator Fit Testing; HAZWOPER Emergency Responder Training; EPA Hazardous Waste Handlers Training.

EPA MACT Standard - URGENT CALL TO ACTION!!: The EPA is preparing a proposal that will be published in the Spring. Concerns of its approach for Open Molding are following. It is important to **review the draft, evaluate your ability to meet MACT and then write to EPA and explain how you will not be able to meet MACT (if that is the case).** This ruling will affect all fabricators who are Major Sources (or will be Major Sources) under the Clean Air Act. If you have not gotten a copy from your sales rep yet, please contact us and we will fax it over to you immediately for review. **Comments due by February 15!!!**

New rulemakings to look for in 2000:

OSHA

Final Rules:

Simplified Injury/Illness Record-keeping Requirements. 4/00.

Employer Payment for Personal Protective Equipment. 7/00.

NPRM:

Prevention of work-related musculoskeletal disorders. 11/99 - comments due by 2/00.

Spray Finishing Standard in Plain English. 12/99 - still not issued.

Safety and Health Programs. 4/00.

Flammable and Combustible Liquids Standard in Plain English. 12/00.

EPA

NPRM: NESHAP for Boat Manufacturing. 1/00.

NESHAP for Reinforced Plastic Composites Production. 4/00 - See above!

Management of solvent-contaminated shop towels and wipes. 7/00.

Review of chemicals on original TRI list. 12/00.

Should you have any questions on compliance issues, please give us a call at the number below.

Summary of CFA's Concerns with EPA's Current Approach to MACT for Open Molding

January, 2000

95% control (incineration) is required for existing sources with actual emissions above 100 tons per year.

We want EPA to:

- Increase the 100 ton per year threshold so that only appropriately large sources are included.
- Adjust the control requirement to reflect actual industry practice.
- Allow sources to use pollution prevention instead of add-on controls if the resulting emission rate is "almost" as low.

Up to 95% control is required for most new and reconstructed sources.

We want EPA to:

- Provide a size-based threshold for new source MACT.

- Require new and reconstructed sources with emissions of less than the threshold to achieve existing source MACT
- Require only larger new and reconstructed facilities to achieve new-source MACT (which in many cases will mean add-on controls).

The floor (minimum stringency level) for clear gel coats is too low for products needing to meet the ANSI requirements for sanitary ware.

We want EPA to provide a separate group for these products, with a HAP limit of 46%.

The floors for manual corrosion and filament winding corrosion are too low.

We want EPA to allow the same HAP contents for manual and filament winding as allowed for mechanical (48%). This is consistent with SCAQMD Rule 1162.

The floor for filled mechanical will not allow the use of the needed resins for acrylic-faced bathware and other products.

We want EPA to establish a separate group for these products (i.e., where thermoplastic sheet is used instead of gel coat as the exterior surface of the product). Operations in this group would be allowed to use resin with up to 42% HAP.

The floor for mechanical application of tooling resin will require the use of flow coaters (and therefore prevent the use of many filled tooling resins), and the floors for manual tooling and tooling gel coat are too low.

We want EPA to exempt tooling resins and gel coats from HAP limits, for the following two reasons:

- The use of these materials is very limited, relative to resins and gel coats generally.
- Emissions will increase if tooling performance decreases as a result of lower HAPs.

The floors for existing sources are too restrictive.

EPA assumes that emission reduction techniques are widely feasible, when in fact:

- Flow coaters do not work for vertical molds, deep parts, etc.

- Low-HAP gel coats are new and long-term performance is unknown.
- Smaller fabricators often can not reasonably absorb the risk of switching to new materials.
- Customers often require the use of higher-HAP resin, even for non-corrosion products.
- For demanding applications, low-HAP resins are too expensive.

We want EPA to:

- Allow credit for controlled spray for gel coat and atomized resin application (where flow coaters do not work).
- Include products that need higher thermal properties or higher strength with corrosion products, i.e., with higher HAP limits (like SCAQMD Rule 1162).
- Provide a higher HAP limit for pigmented gel coat.

The Department of Health, Safety & Environment encourages all customers of Composites One to give us a call at **(800)621-8003** . If you would like more information on any of the topics listed above, or just have a compliance question related to your facility, please use us as a regulatory resource. We look forward to talking with you soon.

Information Line....(800) 621-8003

[BACK](#)