INCMA Environmental Committee Meeting

June 7, 2018

Attendees:
Tom Rarick, ERM
Doug Smith, Rochester
Kathy Moore, Keramida
Gwenn Sanders - Waupaca
John Haney, Ford Meter Box / *calling in*
Michael Schall, Dalton
Scott Kiechle BCI
Kayla Gibbons, Rochester
Aaron Miller, ID Castings
Earl Miller, Accurate Castings
Tim Higgins, KERAMIDA
LeRoy Welling, Atlas Foundry
Mike Boucher, Rochester
Blain Jackson, Bahr Bros Mfg
Steve Carl, Bahr Bros Mfg
Mike Martin, NVIC
Dan Plant, MTI
Patrick Bennett, INCMA
Blake Jeffery, INCMA

1. Silica Update

- Attorney reviewed 40 faqs where there is agreement with OSHA staff. (phase 1)
- Attorney are now working with OSHA on 30 faqs without agreement (e.g., feasibility, sweeper study -hepa filter didn't show improvement – some with water have had mixed success)
- Deadline: June 23, 2018 / Formal request for 180 day delay made in early May
- June 14th – AFS Safety & Health Committee meeting – discussion on sweepers

2. Silica / Member Experience

Planned Approaches / Goals
Areas of Concern
Lessons already learned

3. General Issue Update

- Revisions to the MACT standard for iron and steel foundries,
- EPA's modified "once in always in" policy and
- EPA interpretation changes to the PSD rules that could make avoiding PSD easier.
- RTR - Residual Risk and Technology Review (EPA Air Toxics Regulatory Review)
- Solid Waste Rule Changes / Court Decisions
- Electronic Reporting for Manifests
- AFS Update - EHS assistance / Advanced Air Class, Cleveland, Oct. 8-11, 2018

4. Adjourn

Minutes
Present - see agenda above.
Tim Higgins, Committee Chairman, convened the meeting at 10:35 am.
Tim welcomed everyone and requested introductions.

Blake thanked everyone for coming and reviewed the status of the Silica rule and AFS efforts to impact it's timing and application. He relayed that OSHA had agreed with approximately 40 "frequently asked questions" FAQ's and they were working on several more associated with compliance/enforcement issues. They are also still working to secure a 180-day delay from the June 23, 2018 compliance deadline.

Blake then suggested each foundry representative walk through where they are in their efforts to comply with the silica rule, areas of concern and lessons they have learned.

Sampling/Monitoring
Each foundry responded. All are in the process of compliance with most well into it but a few still struggling to move their process forward beyond mapping. All have done sampling, and most continue to sample. It was noted that the rule requires sampling by both job classification and process. One consultant noted that some foundries had built collection stations that could be attached to machines and had been moving them around to units via fork lift to assist with monitoring. One foundry noted a spike in real time monitoring when employees were removing gloves and going to break room. Another noted a suspicion that employees were trying to skew sampling results due to frustration with an unrelated policy.

Medical Surveillance
Most foundries reported challenges associated with medical surveillance and particularly finding NIOSH B Readers in their area hospitals. Some foundries were able to identify B Readers through mobile companies such as Examinetics and Biotech X-ray. According to the CDC, this link is supposed to reflect a complete list of B-Readers throughout the United State.
One foundry noted the OSHA Small Entity Compliance Guide had been helpful to them – available at: https://www.osha.gov/Publications/OSHA3902.pdf

Sweepers
Most foundries indicated that solving one area problem had created problems in other areas. Almost all indicated shake out was a primary area of concern and most were looking at sweepers to help address compliance. The Tennant s20 sweeper was mentioned favorably by several foundries. It was also suggested that DeWalt makes a small affordable sweeper that works well. One foundry noted that silica dust wasn't always the type of dust causing problems in their testing. Some found that HEPA filters were working well and that wet sweeper did not work well although problems with wet sweepers could be in poor design. Watch for static pressure when dry vs wet. It was suggested that a displaced filter is required, or the water creates mud and is a problem.

Make Up Air
Many facilities were focusing on air make up as most helpful in meeting standards. One noted that in the past it was treated as a comfort but will now be a control and require a new mind set change by the employees and that that the air will likely need to be heated in the winter.

Exposure

Another foundry was looking at utilizing the 30 day exposure limit as an option for some job classifications to meet the new standards. There was interest in any feasibility studies on compressed air but none were referenced during the meeting.

Alternate Materials

A few foundries had done some work with alternate sand materials, but none had found them to be effective enough to offer substantive solution yet. One noted the materials worked well but couldn't be reclaimed using a thermal system making them not cost effective.

Clean Up

Many expressed clean up as a challenge. One foundry shared their success in identifying materials that could be used to make cleaning easier. They had been working with Momar who makes a product that coats sand with a pressure sprayer during clean up to make it sticky. They also make a product that can be sprayed on the walls that seems to work extremely well. http://momar.com / http://mintech.com

Other

One foundry was looking at going to battery operated trucks to limit problems.
One consultant noted the challenge of all compliance until OSHA begins to inspect and provide better feedback on what is actually cost effective.
All agreed that documentation was critical and encouraged one another to be diligent.

General update

MACT stds.

The Court ordered a final rule by June 30 2020. Agency hoping to have a proposed rule by June 27, 2019 is goal. Using 2014 emission inventories. List is down to 30-50 foundries possibly impacted. EPA has already pushed back dates for sharing data etc. anticipating only 30-60 days to respond once published. This is a major topic for next AFS air quality committee. AFS is seeking $100k budget for assistance on it all for next year. They will be looking for language suggestions when rule is open.

Modified "once in always in" policy

There is some interest in getting regulatory relief and many are suggested the most efficient way to revise interpretations of compliance requirements. To that end. EPA is considering a revision to once in always in rule for major source definition. A change could allow a foundry e to move from PSD to an area source but may or may not always be better for a foundry. They are also Looking at PSD applicability for changes to an operation. In the past, there was no credit for a system being shut down but now the policy may allow credit for a system being shut down which could be very beneficial.

Misc. Issues:

Brief discussion of new electronic reporting requirements and for foundries to be aware.

AFS is struggling to assess an appropriate level of support on EHS assistance

ASTM was thought to have a new standard for beneficial reuse of spent foundry sand when used in asphalt. Their stds sunset every 8 years. D8140-18. Asphalt use was the document referenced.

FYI, C Sector 40cfr82 refrigerants list and requirements were recently updated. It was suggested that foundries may want to do an inventory to make sure records are accurate given that it can affect several compliance areas.

Hearing no additional business, the meeting was adjourned at 12:35 pm.