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Quarter 4 - 2010

Proposed EPA Rules for Burn-Off Ovens

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Air emissions from industrial and commercial incinerators are regulated by the emissions standards and performance standards at 40 CFR Part 60, Subparts CCCC and DDDD. Currently, the regulations contain exemptions for several categories of incinerators that would otherwise be subject to these standards, including burn-off ovens used by some processors to strip materials off of metal parts for purposes of reclaiming the metal parts for reuse. This summer EPA issued proposed air emission regulations that would eliminate the exemption for burn-off ovens, thereby resulting in new emissions control and performance standard requirements for even the smallest burn-off ovens.

If the proposed rules are adopted, owners and operators of existing and new burn-off ovens would be required to conduct an initial emissions test for each of the following pollutants:

- hydrogen chloride
- carbon monoxide
- lead
- cadmium
- mercury
- particulate matter
- dioxins and furans, total and TEQ
- NOx
- sO2
- opacity

Proposed EPA Rules Would Eliminate Existing Exemption for Burn-Off Ovens from Commercial and Industrial Incinerator Emissions Regulations

In addition to this initial test, annual performance tests would be required for the following pollutants:

- hydrogen chloride
- particulate matter
- fugitive ash
- opacity

An emissions standards for new burn-off ovens would be significantly lower than the standards for existing units. To comply with the new regulations, if promulgated in their current form, facilities will either have to install air pollution control devices such as scrubbers and baghouses or, more likely, will be forced to shut down their ovens and switch to an alternative treatment such as abrasive blasting. The proposed rules would also establish inspection, monitoring and recordkeeping requirements for both existing and new units.

We believe there are several problems with the proposed rules that will result in changes being made prior to promulgation of a final regulation. First, EPA identified only 36 burn-off ovens in use in the entire nation. However, according to estimates from some manufacturing industry groups, there are literally thousands of such units currently in use in the country. Therefore, EPA has seriously underestimated the impact of the proposed regulations on the regulated community. Secondly, there is no exemption for small burn-off ovens, meaning that even ovens that are used only sporadically would have to install costly air pollution controls to meet the emissions limits. In the Federal Register Notice for the proposed regulations, EPA acknowledged that the "amount of waste combusted in these units is generally small (pounds per year

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PMA Executive Director's Message Jane Svinicki



Ending One Year, Beginning Another

The 2010 calendar year is ending and PMA planning for 2011 is beginning. The PMA Board of Directors and Division Chairs met in late September/early October in Florida. The meeting was held at Amelia Island Plantation, site of the PMA annual meeting in April 2011.

Over two days of careful discussion and decision-making, every activity of the association was examined. The finances were reviewed and the value of marketing, legal, regulatory, membership and meeting activities to the PMA members were assessed.

The Board approved a break-even budget, one that will maintain the current level of reserves, while still providing the critical services necessary to meet the needs of members. Thank you for the hard work of our Board members to safeguard the resources of our organization and insure its sustainability in these difficult economic times.

What Are Members Saying About the State of the Industry?

In the fall of 2010, the PMA marketing firm conducted a survey of members to shed light on the trends and projections of our members. Generally, the mood of members was optimistic, with a majority stating that business opportunities would slightly increase in 2011.

The results of the survey will be available to the members and provided to our media contacts. It includes information on the markets where growth is anticipated, and where it is stagnant. Members were also surveyed to determine if (and why) any customers or potential customers were influenced to use polyurethane in place of another product.

Processor members continue to diversify their businesses and expand into new markets. Customers who did switch to polyurethane said it was often because of greater durability. Our marketing message of 'Surprisingly Versatile' is gradually rising to a higher level of awareness in the marketplace.

Look for more information from the study in the next several months.

As the year ends, thank you to all of our members and supporters for another great year. From Jennifer, Tiffany and myself, we enjoyed the opportunity to serve PMA for another year. You are a great group of people to hang out with and we look forward to 2011.



Jane Svinicki, CAE
Executive Director

Proposed EPA Rules for Burn-Off Ovens

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in some cases) and the configuration of the stacks that serve these units precludes the use of some EPA test methods for measuring emissions and could affect the ability to install certain control devices." The high cost to comply is simply not warranted relative to the modest emissions reductions anticipated from the rule. In fact, EPA anticipates that the regulations as proposed would result in the shut down of the majority of burn-off ovens currently in use and would also result in no new burn-off ovens being installed.

EPA received numerous comments on the proposed regulations, many of which dealt with the burn-off oven issues noted above. We believe EPA will likely address the proposed burn-off oven standards to lessen the impact on small businesses, but it is also possible that the regulations will be adopted as proposed. There is no timetable for promulgation of a final rule. PMA will monitor future actions related to this proposed rulemaking and will report on any developments.