**NSC Technical Subcommittee Call Minutes – September 15, 2015 DRAFT**

Temporary Tech-Subcommittee folder:

<https://upenn.box.com/s/doptddztmkcv98zefar7>

**Attending:**

Reg 1: Sara Johnson - NH

Reg 3: Jeremy Hancher - PA

Reg 4: Mary Talukder - GA; Tony Pendola - NC; Melissa Collier - MS

Reg 5: Erin Conley - IL; Jenifer Dixon - MI; Ian Le - MN; Kimberly Ake, Lisa Ashenbrenner, Jennifer Hamill & Renee Bashel - WI; Rick Carleski - OH; Mark Stoddard - IN

Reg 6: Diane Wilkins - OK; Patty Avery – TX; Sandy Spon - NM

Reg 7: Barb Goode - KS

**Approval of August minutes:** approved as is.

**Chromium Electroplating NESHAP –** After September 21, 2015, the owner or operator of an affected…tank shall cease adding PFOS-based fume suppressants to any affected…tank.

* **Collin Peters, North American Business Manager for Atotech** – shared information regarding the transition process from PFOS to non-PFOS-based fume suppressants.
  + Atotech is a global supplier to the metal finishing industry; identifying future trends and assisting with the transition
  + Replacement products are available which makes the transition easier, requiring few changes, but there is a learning curve
  + European countries have already placed restrictions on the use of PFOS
  + Two challenges
    - Solubility: non-PFOS wetting agents tend to be less soluble in water, more so in hard water (Calcium, Magnesium; possibly Sodium and Potassium)
    - Foam depth: it is recommended to add non-PFOS slowly and incrementally to minimize the formation of foam; excessive foam traps hydrogen gas which may ignite from an electrical spark
  + Options include replacing bath with non-PFOS or gradually adding non-PFOS allowing PFOS to diminish over time due to drag-out
  + Very little cost difference, as availability of PFOS products decrease price has increased
  + Platers who are members of a trade organization are aware of regulatory change, smaller shops may not be aware, Atotech contacting everyone who purchased PFOS products to let them know about changes
* **Karl DeWahl, Senior Engineer with the Minnesota Technical Assistance Program (MnTAP)** – Provided an overview of the Minnesota Surface Finishing Perfluorochemical Pilot Project started in 2010. The project is an example of collaborative outreach involving industry, technical assistance providers, wastewater treatment entities as well as EPA and state environmental regulatory agencies.
  + Voluntary switch to non-PFOS chemicals in Minnesota during 2007-2010 – driven by 3M which has discontinued producing perfluorinated compounds including PFOS because of tendency to bioaccumulate and known surface and ground water contamination; fish advisories
  + Contamination of lake traced to storm contamination from a captive plating shop
  + Pilot project to work with chrome plating shops – review metal finishing operations including bath replacement, drag out from plating and rinse tanks; reduction in PFOS concentration over time with goal of limiting effluent discharges of PFOS to 12 ppb
  + Atotech started work in 2008 to develop a non-PFOS alterative; began marketing and producing an alternative in 2009-2010
  + Mechanical methods (air pollution control) of suppressing mist is expensive (capital and operation costs) compared with use of wetting agents/fume suppressants/surfactants
  + Local metal finishers were active participants
  + PFOS detections in the City of Brainerd, Minnesota – 2007 – Agency for Toxic Substances and Disease Registry
  + TSCA – significant new use rule which includes PFOS - <http://www.epa.gov/oppt/existingchemicals/pubs/actionplans/pfcs.html>
* **Mark Stoddard, Indiana** – Provided a brief synopsis of a presentation we was making to an industry group of metal finishers.
  + Presenting later in the day to newly formed Indiana chapter of the National Association of Surface Finishing
  + Question on how to demonstrate compliance with NESHAP restriction of PFOS usage - safety data sheet may not clearly state whether product is PFOS free, clarification from EPA would help, supplier statement, letter or technical data sheet would also help
  + California may request extension to allow for testing of non- PFOS products which also meet California emission limits; metal finishers would continue to use certified PFOS products - <http://www.arb.ca.gov/toxics/chrome/fumesuppresslist.pdf>

**Potential Future Topics**

* Resources for inspectors to provide when small business assistance is requested (instead of factsheet referenced in August call)
* More RICE discussion
* Proposed Rules: Management Standards for Hazardous Waste Pharmaceuticals / Hazardous Waste Generator Improvements
* UST regulatory changes
* Secondary Aluminum Processing NESHAP
* Isobutane and propane as refrigerants
* Ohio EPA’s new Permit Wizard

**Next Call:** October 20, 2015

2-3pm EST (3rd Tuesday of month)

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