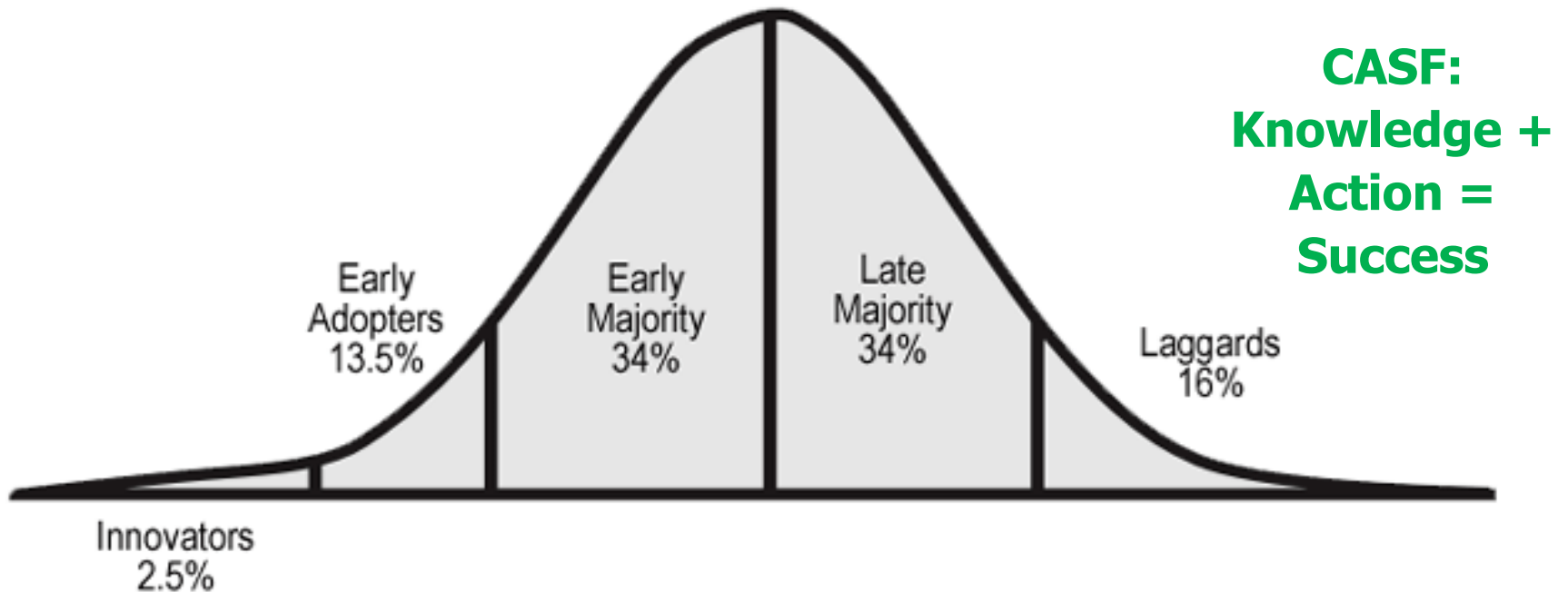




Regulation & the Business Equation:

“If you’re standing still, you’re already behind!”

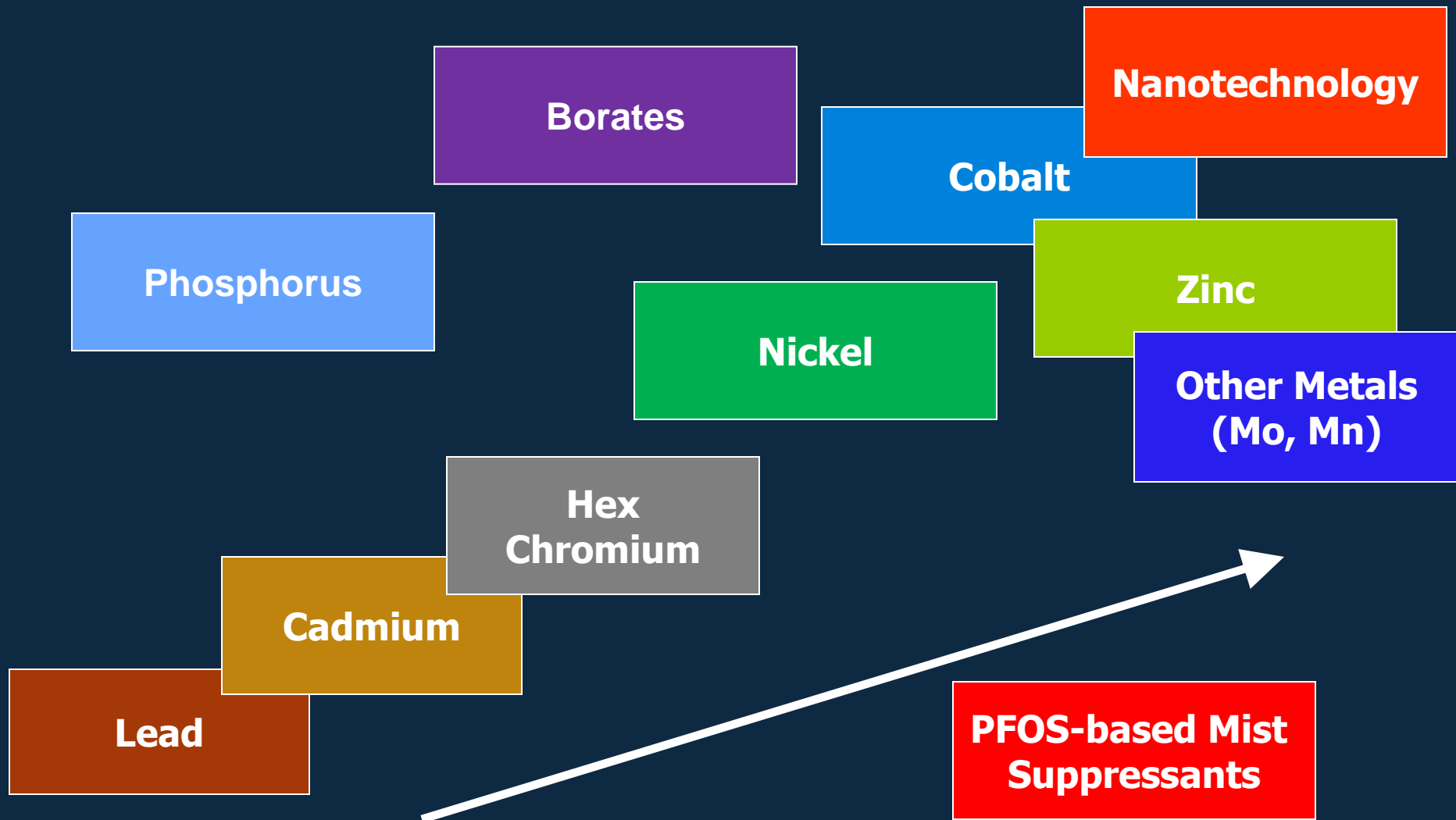
Categories of Innovativeness*



*From E.M. Rogers, *Diffusion of Innovations*, 4th edition (New York: The Free Press, 1995)

Global Trends: Continued Expansion

Regulation & Technology Change – 1970s to Present



Regulatory Focus: Old Model Shifting Over Time

Entire Product Life Cycle – “New Regulators”

**Congress &
EPA**

Processes



Products



**EU &
States**

Inputs



EU & States

**Accelerating Trend:
Corporate
Procurement Policies
Responding to NGOs &
Emerging
Chemicals Lists**

Trends: A Closer Look

Metals and Chemicals in the Supply Chain – Past, Present & Future

Suppliers

Managing Inputs

Chemical Use Controls

- EU REACH, Nickel CLP
- TSCA
- *US EPA Chemicals Lists*
- *US States – New Lists*
- *US HHS NTP Report on Carcinogens*
- Conflict Minerals: US/EU
- DEA Hypophosphite

EVOLVING

Finishing Operations

Managing Processes

Regulatory Controls

- Air – Stack Controls
- Water – Effluent Controls
- Waste – RCRA
- OSHA – Worker Safety
- Facility Security – DHS

MATURE

Industrial Customers/OEMs

Managing Products

Materials / Product Controls

- ELV Directive
- RoHS / WEE Directives
- EU Nickel CLP
- *California Green Chemistry Initiative*
- *Corporate/Consumer Driven Approaches*
- **Materials De-Selection**

EVOLVING

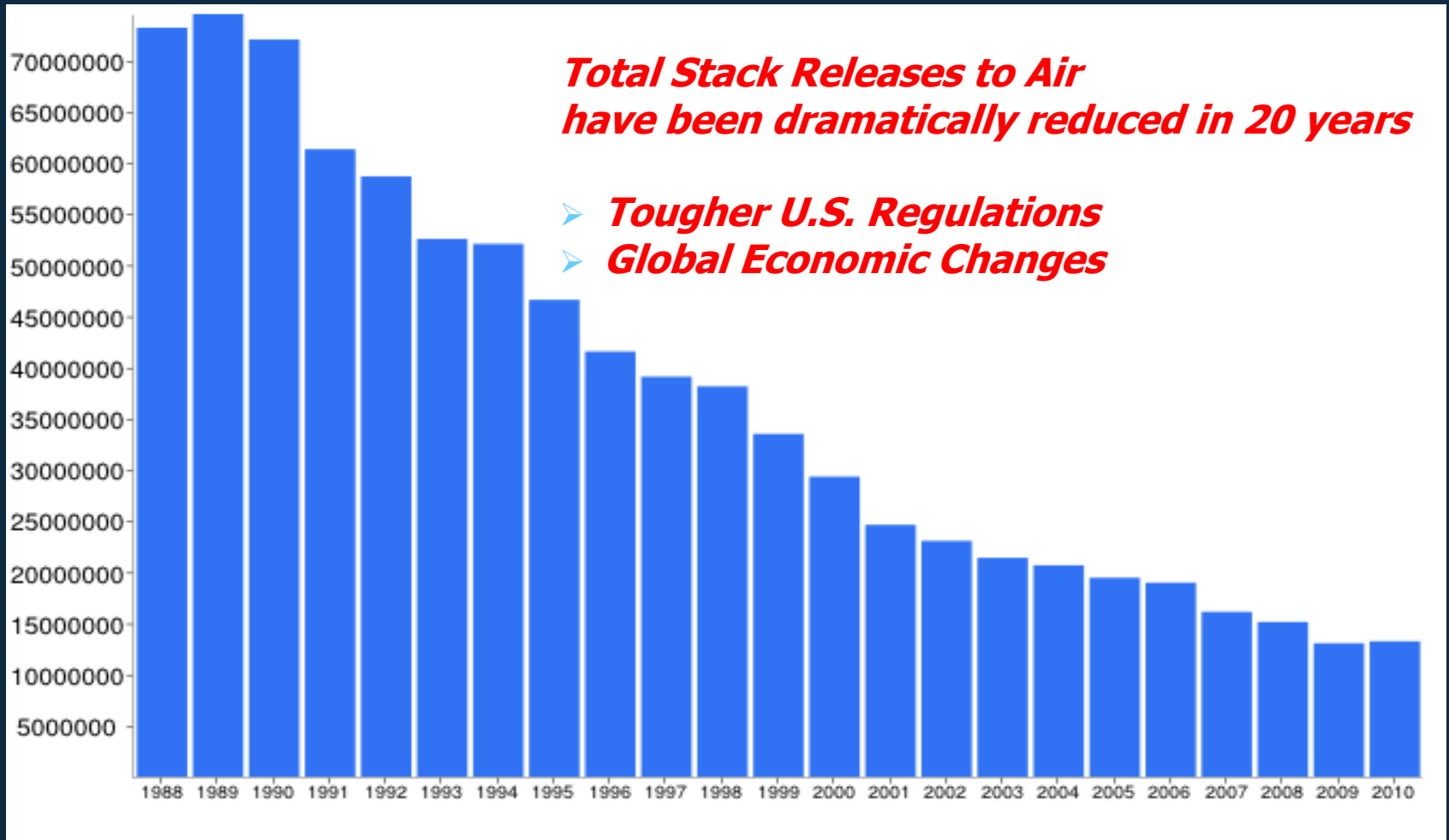
➤ ***Complexity of the Landscape is not Decreasing, but Increasing!***

Regulatory Policy: NASF “Priority” Action Items

Selected Issues on the Agenda for 2013-2014



Environmental Impacts Decreasing: U.S. Fabricated Metals Sector, 1988 – 2010 (pounds/year)

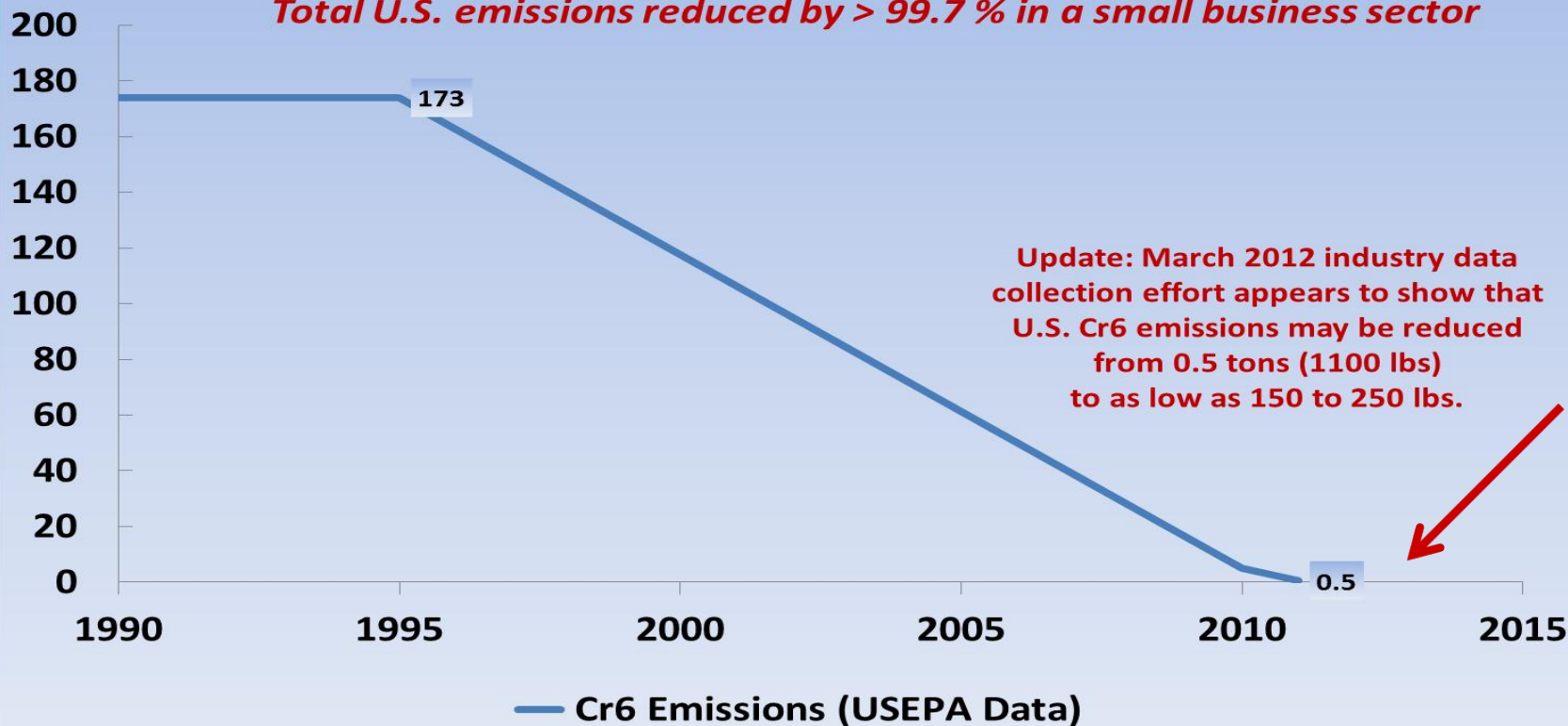


Chromium Plating / Anodizing Air Emissions Reduced by 99.7 Percent, 1995 – 2012 (tons per year)

U.S. Cr6 Electroplating Industry Emissions

(from 1995 NESHAP to present, in tons per year)

***A Major Clean Air Act Success – 173 TPY to lower than 0.5 TPY
Total U.S. emissions reduced by > 99.7 % in a small business sector***



New Look at U.S. Wastewater Limits on Finishing: National Standards in 1984 / 2001 ... 2014?

<u>Pollutant</u>	<u>Electroplating Point Source Category "OLD" (40 CFR 413)</u>		<u>Metal Finishing Point Source Category "NEW" (40 CFR 433)</u>	
	Daily	4-day Average	Daily	Monthly Average
Limits are in mg / liter				
Cadmium	1.20	0.70	0.69	0.26
Chromium	7.00	4.00	2.77	1.71
Copper	4.50	2.70	3.38	2.07
Cyanide (T)	1.90	1.00	1.20	0.65
Cyanide (A)			0.86	0.32
Lead	0.60	0.40	0.69	0.43
Nickel	4.10	2.60	3.98	2.38
Silver	1.20	0.70	0.43	0.24
Zinc	4.20	2.60	2.61	1.48
TTO*	2.13		2.13	
Total Metals	10.50	6.80		

Hex Chromium: Drinking Water Risks Now Under a Bigger Spotlight – EPA & California



EPA RECEIVES STATE-OF-THE-ART NEW RESEARCH ON HEXAVALENT CHROMIUM (Cr6)

NEW STUDIES PROVIDE CRITICAL INSIGHTS INTO Cr6 IN DRINKING WATER

For chemistry with a somewhat difficult name to remember and pronounce, hexavalent chromium (Cr6) is the subject of years of research and regulatory scrutiny. It's been the focus of news stories and even a major movie. New science is now answering many unanswered questions about the biology and chemistry, filling in missing data in the draft Integrated Risk Information System (IRIS) chemical assessment.

For the first time, researchers report there is no observed toxicity at low levels of Cr6 in drinking water. In fact, the research findings showed that low levels of Cr6 found in drinking water are detoxified (reduced)

information, as it supports the current total chromium drinking water standard of 100 ppb as protective of public health.

These findings lead researchers to conclude that effects of high levels of Cr6 in drinking water in the rodents used in the animal experiments conducted by the National Toxicology Program (NTP) are not comparable to what happens at the significantly lower Cr6 levels in U.S. drinking water. The researchers (see sidebar on next page) observed that when the natural capacity of the stomach fluids in the NTP test animals was overwhelmed by high Cr6 concentrations, the excess

Chromium: A Recent U.S. History for Coatings

Recent Action on Hexavalent Chromium – A Challenge for Industry

- ❑ ***Worker Exposure Standards – U.S. Labor Department 2004***
 - New worker exposure limit – 5.0 micrograms per cubic meter
- ❑ ***Air Emission Standards – General Plating & Polishing 2008***
 - Chromates, nickel & other processes – no new standards
- ❑ ***Military Uses of Chromium 2009 – 2013***
 - Restrictions on use of hex chrome – exemption for plating processes
- ❑ ***Air Emission Standards for Hexavalent Chromium 2010 – litigation***
 - The new rule tightens the old standard by 50 percent ++
- ❑ ***Cr6 Risk Assessment / Drinking Water Standards 2011 – present***
 - U.S. EPA revising its current human health risk assessment
 - California Drinking Water Standard – under review with decision pending

New Mandates for Chemicals and Metals: U.S. EPA and U.S. Department of Defense

Provisional Health Advisories for Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS)

January 8, 2009

Recent Decisions:

- No hexavalent chromium-based primers
- Defense exemption for Cr6 plating/anodizing
- No PFOS chemicals in plating mist suppressants
- Concerns about nickel health risk and use

Official Journal of the European Union

DIRECTIVES

COMMISSION DIRECTIVE 2009/2/EC
of 15 January 2009
on the adaptation to technical progress
of the law, in
unification, packaging and labelling
(Text with EEA relevance)

(4) Annex
group
where
and
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As stated



ACQUISITION
TECHNOLOGY
AND LOGISTICS

THE UNDER SECRETARY OF DEFENSE
3010 DEFENSE PENTAGON
WASHINGTON, DC 20301-3010

NOV 25 2008

MEMORANDUM FOR SECRETARY OF THE ARMY
SECRETARY OF THE NAVY
DEPUTY UNDER SECRETARY OF DEFENSE
ACQUISITION & TECHNOLOGY
DEPUTY UNDER SECRETARY OF DEFENSE (LOGISTICS)
DIRECTOR, RESEARCH AND ENGINEERING

SUBJECT:

The attached draft memorandum proposes to
minimize the use of hexavalent chromium in the
extensively used in the defense industry. The number of actions to
be taken to implement this memorandum was coordinated
with the Department of Defense (DOD), Service staffs, and the
Please provide your concurrence or comments on the draft memorandum
within 20 days from the date of this memorandum. Comments should be
provided to the Director, Research and Engineering (DRE) at
703 602-0641 or Shannon.Cunniff@defense.mil. The point of contact is Ms. Shannon Cunniff at
703 602-0641 or Shannon.Cunniff@defense.mil.

John Young Jr.

cc:
Chairman of the Joint Chief of Staff
Commander, U.S. Special Operations Command
Under Secretary of Defense for Personnel and Readiness
Director, Operational Test and Personnel and Readiness
Directors of the Defense Agencies
Director, Acquisition Resources and Analysis



Nickel: Recent & New Developments

Emerging U.S. Developments driven by European Action

❑ *European Union: REACH Chemicals Framework*

- EU listed 138 nickel compounds as hazardous (cancer & non-cancer risk)
- EU REACH: France was nominating for Candidate List – **AVOIDED, BUT...**
- ***The SIN List – Nickel compounds make up largest chemicals group***

❑ *U.S. – Nickel listed as a “problem” chemical – Global Market Response*

- U.S. states are listing metallic nickel as a chemical of concern – **TODAY**
- ISSUE – no standard, stigmatization & de-selection of materials for OEMs

❑ *New U.S. Nickel Risk Assessment – U.S. EPA Reviewing all Nickel Forms*

- Concerns about cancer & other health effects – soluble AND metallic
- New U.S. risk #s to drive future U.S. regulations & standards – **DELAYED**

Nickel: U.S. EPA Reviewing Health Risks From Nickel (Soluble and Metallic Nickel)



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U.S. ENVIRONMENTAL PROTECTION AGENCY

Integrated Risk Information System



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IRISTrack Detailed Report

Nickel, soluble salts Assessment Milestones and Dates

Milestone	Estimated Start Date *	Estimated End Date *
Draft Development	FY02/2nd Quarter	FY13/3rd Quarter
Agency Review	FY13/3rd Quarter	FY14/1st Quarter
Interagency Science Consultation	FY14/1st Quarter	FY14/1st Quarter
External Peer Review and Public Availability	FY14/1st Quarter	FY14/3rd Quarter
Final Agency Review/ Interagency Science Discussion and Posting Final Assessment	FY14/3rd Quarter	FY14/4th Quarter

* For EPA, the Fiscal Year (FY) starts in October and ends in September of the following year. First quarter runs from October through December; the second from January through March; the third from April through June; and the fourth from July through September.

Nickel Stakeholders Group: ACC & Nickel Institute – Focus on Value Chain

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knowledge for a brighter future

Aerospace
Coatings & Alloys

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Automotive Nickel
Coatings & Alloys

Nickel in Electronics
Coatings & Alloys

*If every nickel use on the illustration were properly marked

- Alloy
- OEM Coating
- Repair coating
- "Green" coating

OEM Coating

1. Ni plate under Cd on Al electrical connectors – thousands
2. Electroless Ni-P/Ti and Zn/Ni replacing connectors
3. Ni plate under gold plate on all connector pins – thousands
4. Ni anti-seize on threads
5. Ni alloy or Ni plated pitot tube
6. Zn/Ni plating for corrosion protection
7. Ni plated Cu wiring for corrosion
8. Ni plating on bearings for wear

Nickel

Other Coatings

Without nickel and without coatings, you would have no cell phone. Nickel is essential for any battery (Li-ion, Ni metal hydride, Ni-Cd). It makes lead-free solder possible while also preventing electromagnetic interference and corrosion. Without Ni, your cell phone would quickly become a useless piece of electronic junk.

No Nickel, No Electronics

1. Li ion battery anode $\text{LiCo}_0.9\text{Ni}_{0.1}\text{Mn}_{1.2}\text{O}_2$
2. Antenna - NiTi shape memory alloy
3. EMI shielding - Ni paint or Cu plate with Ni overlay, or composite case made of Ni plated carbon fibers in plastic
4. Wire bond, every chip - Ni/Pd/Au coating
5. Wire bond, every chip and board - lead-free solder cannot be used without Ni
6. Lead-free solder cannot be used without Ni
7. Lead-free solder cannot be used without Ni
8. Lead-free solder cannot be used without Ni
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17. Lead-free solder cannot be used without Ni
18. Lead-free solder cannot be used without Ni
19. Lead-free solder cannot be used without Ni
20. Lead-free solder cannot be used without Ni

Without coatings, modern electronics would not exist. Almost everything you see and feel on your cell phone is some type of coating. All electronics are built from coatings of different materials. Without coatings, your touch screen would be just a sheet of glass.

No Coatings, No Cell Phones

Electronics are made almost entirely of complex stacks of coatings: Cu, Ni/Pd/Au

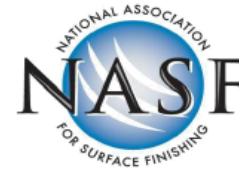
Auto parts – mufflers, catalyst, wiper, lamps, springs, etc.

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NASF Technical Project: Nickel Uses & Plating for EU REACH “Risk Management Options” Process



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EVALUATION OF THE USAGE OF NICKEL SUBSTANCES IN THE EUROPEAN FINISHING MARKET

**2014 will
bring new
review
and
decisions!!**

Report to: France Capon

Nickel Institute

Authors: Ralph Alexander, Keith Legg, Rowan Technology Group

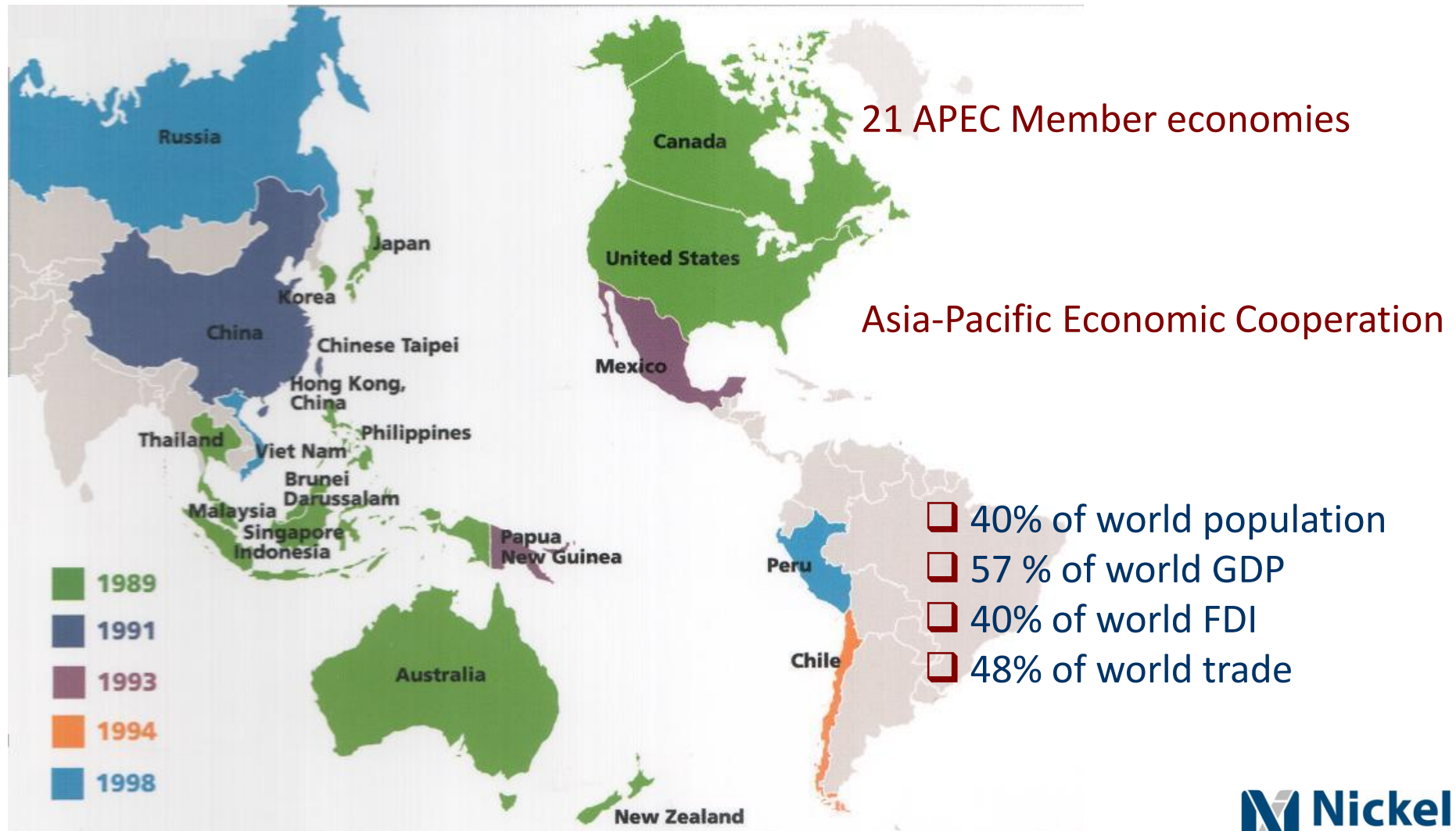
Christian Richter, The Policy Group

State of Maine: “Chemicals of High Concern” Law


Metallic Nickel – Top 49 “worst” – *New Action*

List of Chemicals of High Concern		Toxicity											Exposure																
CAS	Chemical	NTP_REP	GSH cat 1A repro	EU_END1	NTP_cancer	RIS_86A	RIS_96	GSH cat 1 cancer	EU carcinogen 1A	IARC_1	WA_PBT	CAN_PBT or HAS	Bio monitoring	Indoor air and dust	Danish EPA	Dutch (NL) Reports	German FEA	ESIS_RAR	HSDB_NLM	EPA Inventory Use (UR)	HPD_NLM	ChAMP child exp	SPIN	2012 TSCA Work Plan Consumer Products	Peer Reviewed Journals	VOC/EP	Released into air	Ingested by child	Applied to skin
108-88-3	Toluene	✓											8	10	19		✓	✓		✓	>400		✓			✓	✓		✓
115-96-8	Tris(2-chloroethyl) phosphate											✓		2	2	1	✓	✓		✓				✓	1		✓	✓	
117-81-7	Di-(2-ethylhexyl) phthalate, DEHP			✓									9	10	22	1	✓	✓	✓	✓	1		✓		1				
118-74-1	Hexachlorobenzene	✓	✓								✓		6																
120-47-8	Ethyl paraben			✓									2	1	6	1					75		✓		1				✓
131-55-5	2,2',4,4'-tetrahydroxybenzophenone, BP-2			✓											1						73								✓
131-56-6	2,4-Dihydroxybenzophenon			✓									1						✓		25				1				
131-70-4	Mono-n-butylphthalate			✓									4		2														
140-66-9	1,1,3,3-Tetramethyl-4-butylphenol			✓									5		1	1			uk					✓				✓	
556-67-2	Octamethylcyclotetrasiloxane			✓								✓		1	4				✓	✓	26		✓	✓	1		✓		✓
608-93-5	Benzene, pentachloro-			✓							✓	✓	2																
1163-19-5	2,2',3,3',4,4',5,5',6,6'-Decabromodiphenyl ether; BDE-209										✓		1	2	2			✓		✓						✓			
1634-04-4	Methyl tert-butyl ether; MTBE			✓									4	4						✓									
1763-23-1	perfluorooctanyl sulphonic acid and its salts; PFOS										✓		5	3	1										2				
1806-26-4	Phenol, 4-octyl-			✓									nd2	1		1									1			✓	
2425-85-6	2-Naphthalenol, 1-[(4-methyl-2-nitrophenyl)azo]-											✓			1						4		✓						
5466-77-3	2-ethyl-hexyl-4-methoxycinnamate			✓											1				✓		109								✓
7439-97-6	Mercury & mercury compounds	✓									✓		3	1	3				✓		2	✓	✓	✓					
7440-02-0	Nickel & nickel compounds				✓								3	2	9		✓			✓	3			✓	1				
7440-38-2	Arsenic & Arsenic compounds	✓		✓		✓		✓		✓			6	5	4						5		✓	✓					
7440-41-7	Beryllium & Beryllium compounds				✓		✓	✓		✓			4																
7440-43-9	Cadmium				✓					✓			8	2	5	1	✓				6		✓	✓					
14808-60-7	Quartz				✓			✓		✓										✓	>400		✓	✓					✓
25013-16-5	Butylated hydroxyanisole			✓															✓		41		✓						✓

Asia-Pacific Developments: APEC & Nickel



APEC Study: \$ Impacts of EU Nickel Decision



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Socio-Economic Study of Impact of EU Nickel Compounds Classification on APEC Economies

PUBLICATION NUMBER: APEC#212-SO-01.1
YEAR: 2012
PUBLISHED DATE: June 2012
PAGES: 142
TYPE OF PUBLICATION: Report
PUBLICATIONS UNDER: [Mining Task Force \(MTF\)](#)
ACCESSED: 962

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Short Description

This report sets out a quantification of socio-economic impacts on selected APEC economies of a 2009 European Commission decision to classify as hazardous 138 nickel-containing chemicals (1st ATP of EU Classification, Labelling and Packaging regulation).

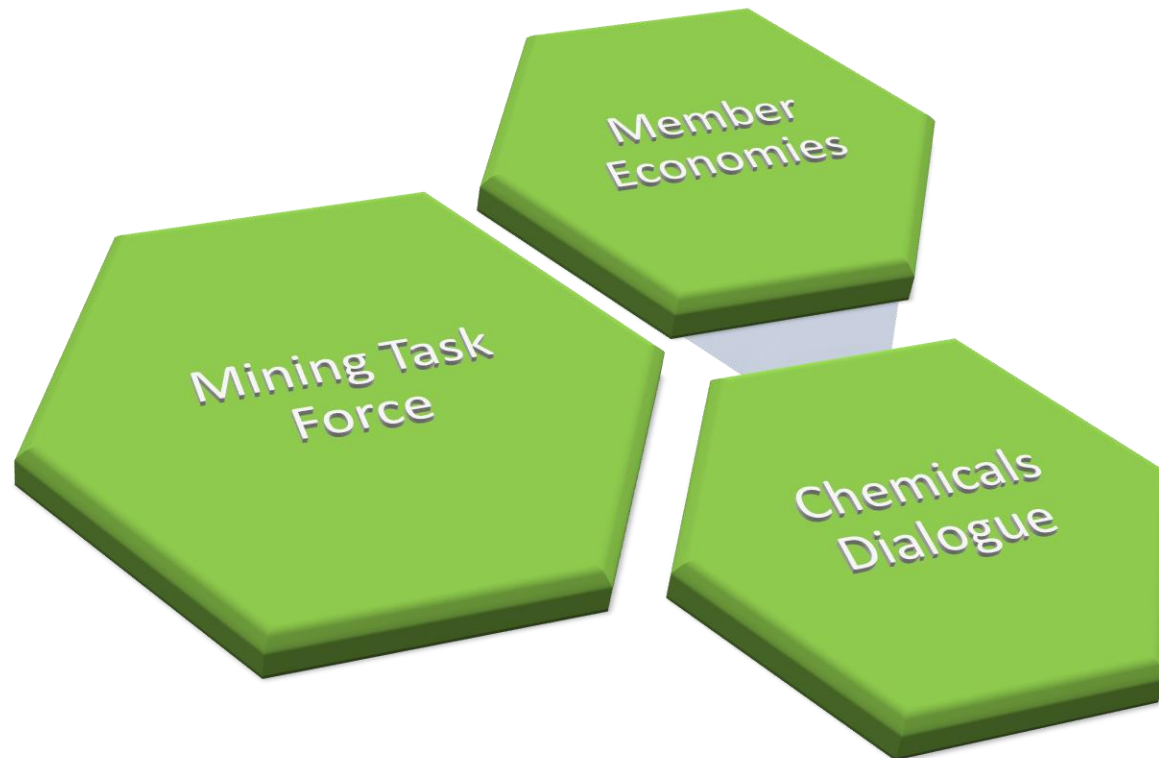
This report contains the results of a socio-economic assessment which quantified the likely impact of this classification decision on nickel production and demand in a number of nickel producing and consuming APEC economies. The assessment involved extensive data gathering, analysis and modelling based on identified impact scenarios.

Content Summary

Executive Summary
1. Introduction
2. Background to the Study
3. Design and Scope
4. Assessment of Impact Methodology
5. The Global Nickel Industry
6. Nickel and APEC Economies
7. Classification of Nickel-containing Chemicals in APEC Economies

APEC Chemicals Dialogue, June 2013: Metals Risk Assessment Workshop Option

Inform APEC economies on addressing the unique properties of metals in Risk Assessment as new regulatory decisions emerge



NASF: The Global Surface Technology Roundtable

- ❑ ***Emerging global developments warrant collaboration***
- ❑ ***Focus on sustainability – a “level playing field”?***
- ❑ ***Collaboration on key issues – mutual interests***
- ❑ ***Information exchange and global coordination***
 - ✓ ***Objective – Maintain a viable surface coatings industry***
 - ✓ ***Recent examples – Korea REACH, California Green Chemistry***

“In a global world we are slowly moving to global standards.”

– Isabel Hilton, ChinaDialogue

NASF: Addressing Emerging Regulation

- Challenge poorly informed restrictions – esp. with significant \$ impact
- Support good practices and sustainable long-term alternatives
- Substitutes – informed by science & room for technology transition





"These new regulations will fundamentally change the way we get around them."

If only it were this easy...



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Participate in strategic briefing sessions, meet industry colleagues and tell Congress that the nation's fiscal future and economic security depend on an improved climate for manufacturing.

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If your company is looking for tools and resources to inform better business and technical decisions and would like more information on connecting with NASF, please contact Phil Assante at NASF Member Relations directly at (703) 887-7235 or by email at passante@thepolicygroup.com.

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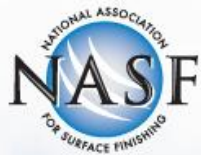


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Cleveland, Ohio
Cleveland Convention Center





MANAGEMENT CONFERENCE

February 23-27, 2014
Maui, Hawaii

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Thank You for a Successful Conference!

The 2013 NASF Management Conference in Key West was a success, with over 80 industry executives, owners and managers in attendance from the surface finishing industry. Attendees enjoyed a variety of sessions, with topics ranging from the economic outlook for finishing and manufacturing, current and future business perspectives, and an overview of the latest trends in technology and materials.

A Word from Our 2014 Conference Chair

Thanks again to Blair Vandivier for an exciting and informative Management Conference in 2013!

For 2014 I would like to invite you to join NASF at the Sheraton Maui on Kaanapali Beach for another round of valuable presentations, networking opportunities, and exhilarating experiences with executives from some of surface finishing's most successful and influential companies.

We are planning a lineup of dynamic speakers presenting on topics ranging from surface finishing regulation to business management. In addition, you and your guests will have ample opportunity to experience the best that Hawaii has to offer from one of its premier resorts.

Check back often for updates or [join us on Facebook](#) for regular posts on the Management Conference and other NASF events. We hope to see you there!



Mike Kelly
ASKO Processing, Inc.



2014 NASF Management Conference Keynote

Robert O'Neill

**Building Extraordinary Performance
Within Business**



THE BRIGHT DESIGN CHALLENGE

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What is The Bright Design Challenge?

Surface finishing is everywhere you look in the millions of products we use every day. From the car you drive, to the cell phone that drives your life, most everything is "finished" with some form of coatings technology. Surface technology adds value to products by making them last longer, look better or perform in ways that would otherwise be impossible.

The National Association for Surface Finishing (NASF) believes that the future of surface finishing depends on the innovative ideas of our youth. We consider it the responsibility of those currently serving the industry to foster and nourish these ideas. As part of this mission, and to spotlight the impact we have on millions of products and households, the National Association for Surface Finishing each year proudly presents The Bright Design Challenge. This ground-breaking creative program is

Auto Show Interview with Mark West of the College for Creative Studies



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VOL. 01

ADVANCED SURFACE TECHNOLOGY

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ISBN 978-87-92765-19-2

VOLUME 01

Advanced Surface Technology

A holistic view on the extensive and intertwined
world of applied surface engineering

by Per Møller & Lars Pleth Nielsen



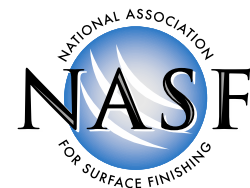
MÖLLER & NIELSEN



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Collaboration:***

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Strategic Partnership Program
Help Shape the Future of Your Surface Finishing Industry



Industry Participation & Collaboration are Key!

***“If you don’t have a seat at the table, then
you’re what’s being served on the menu.”***



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