

The Finishing Touch

OAMF News

December 2005

Waste Treatment Operator's Certification Exam

As you should be aware by now, the **Northeast Ohio Regional Sewer District (NEORS)** has recently made the decision to require at least one certified waste treatment operator on staff at each facility operating a pretreatment system. This requirement will be effective beginning with the next issuance of Administrative Orders. A letter dated July 15, 2005 from NEORS was sent to all permitted facilities notifying them of the district's intentions. Certification of waste treatment operators will be handled by the Ohio Water Environment Association (OWEA) in conjunction with Ohio EPA. A multiple choice examination based on specific methods, techniques, and calculations required to operate a metal finishing pretreatment system will be combined with a test of general administrative and legal requirements.

The exam will be broken down into modules that will be chosen by an OWEA committee based on answers to a pre-exam application questionnaire. For example, if it is noted on the exam application that a facility has metals precipitation as part of its pretreatment system, it is likely that a module that applies to that process will be a component of that individual's exam. Likewise, not all exams will include modules that include testing an operator's knowledge of cyanide oxidation if that process is not a part of a facilities pretreatment system. The first exam was offered November 4, 2005 at the offices of the NEORS.

Wastewater Operator Certification Update 11/28/2005

Thanks to those that turned out for the September dinner meeting on the proposed Northeast Ohio Regional Sewer District (NEORS) wastewater operator certification program. Your input was extremely valuable and has all been presented to the NEORS as part of OAMF's ongoing discussions with them concerning this program. At this time NEORS remains committed to establishing a certification requirement for at least one person at each facility with a permit to operate a pretreatment system in the district. NEORS intends this certification requirement be included in the new discharge permits of both metal finishers and all other permitted dischargers including metalworking, food processing, and others. The NEORS proposal would require operator certification through a test administered by the Ohio Water Environmental Association (OWEA) and developed by the American Board of Certification (ABC). The NEORS hosted a testing session on November 4, 2005.

OAMF had 3 people take the test to assess the training requirements. The test was comprehensive and detailed. There were six parts, all multiple-choice. One general exam and five modules that included pretreatment, metals precipitation, solids dewatering, oil and grease, and advanced treatment.

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NEORSD Test Review Continued from Page 1

The test was not easy and requires extensive hands-on experience, classroom learning, and a breadth of waste treatment knowledge beyond the metal finishing industry alone. Discussions with NEORSD to ameliorate the effect of the proposed operator certification requirement will continue.

**INFO FROM Washington and
The Policy Group**

Greetings: Breaking news from the Department of Labor. Please see below. It appears our continued efforts are having some impact, but it is still too early to tell.

Regards, Christian & Jeff

The Occupational Safety and Health Administration's work on a final hexavalent chromium rule was delayed by the need to redeploy resources in response to Hurricane Katrina, but the agency expects to complete the preliminary review of the rule by the end of November, OSHA's Standards and Guidance Acting Director Dorothy Dougherty said in the agency's ninth progress report to the U.S. Court of Appeals for the Third Circuit.

OSHA continues to "work hard on an expedited basis to prepare the final rule," Dougherty said, but the activation of the National Response Plan after Hurricane Katrina affected the rule's progress. Because of OSHA's additional responsibilities under the plan, she said, "Department and OSHA senior personnel were significantly occupied by work related to Hurricane Katrina and were unable to spend the amount of time on the rulemaking that had been planned before the hurricane."

Despite the delay, Dougherty said, OSHA staff have analyzed the rulemaking record and the issues from the comment period, and are nearing completion of draft standards and the accompanying preamble. OSHA has not yet sent the draft final rule to the Office of Management and Budget for review, Dougherty added, but the agency has conducted informal briefings with OMB staff and expects to transmit the

rule by the end of November once a preliminary Labor Department review is completed.

An agency official had told BNA in April that OSHA hoped to finish the rule over the summer in order to submit it to OMB by September.

Thousand-Page Rule Expected

OSHA's progress report is required under the court's April 2, 2003, decision that ordered the agency to expedite rulemaking on hexavalent chromium and issue a proposed rule no later than Oct. 4, 2004, and a final rule no later than Jan. 18, 2006 (65 DLR AA-1, 4/4/03)

The court's timeline envisioned a 60-day OMB review, an OSHA official told BNA Nov. 14, and OMB is aware of the court order. However, the timeline for an OMB review is not set in stone, the official added.

Currently, OSHA is "trying to put all the pieces of the draft preamble together," the official said. The agency is working on matching the text and tables of the contractors' work, checking citations, and summarizing major comments.

When the draft final rule is finished, it will be sent to the Labor Secretary and OSHA Administrator for preliminary review, and then to OMB. After the OMB review, the official said, the rule will be reviewed by the secretary of labor for final approval.

After all the approvals, the official added, it may take a few days for it to be published in the *Federal Register* because the rule and its accompanying documents will probably be more than 1,000 pages long.

The agency's eighth report to the court was submitted Nov. 9. The next OSHA progress report on hexavalent chromium rulemaking is due to the Third Circuit on Feb. 4, 2006.

By Lauren Couillard

NATIONAL NEWS:**Executive Summary***Submitted by: William J. Saas***Highly Successful Planning Retreat Outcome**

The two-day Chicago Planning Retreat, tasked to define the framework for a new, unified Surface Finishing Trade Association, was completed Thursday afternoon, September 29th, with a highly successful and unanimous outcome. The 21 participants of the facilitated retreat, including 7 representatives each from of AESF, NAMF and MFSA, worked very hard to create a business model of a structure they are confident addresses the present and future needs of the current associations. The model that was created properly recognizes the diverse interests, make-up and perspectives of these same organizations, and in a manner that creates a stronger, more viable vehicle for advancing the interests of the North American Surface Finishing community in the long term.

All the retreat participants deserve special thanks and congratulations for both their individual and group contributions to the overall process. Providing a clear and comprehensive summary of over 18 hours of discussion is no small task. Nevertheless, the group also understands the importance of providing a *single message* that summarizes the outcome of the meeting. This is the reason for this Executive Summary.

The following elements summarize the main points of the new business model:

1. The name agreed upon is the National Association for Surface Finishing (NASF). The group concluded this was an appropriate name to reflect the integration of association cultures, while preserving the individual identities and traditions of the former organizations. The Mission Statement for the NASF is “The promotion and advancement of the North American Surface Finishing Industry globally.”

2. A governance structure was defined to manage the activities of the new association in both the short and long term. In the short term, a 15 person transition board will be created that includes 5 *appointed* members from each of the three current associations. Each association will select their own representatives. This transition board will replace the current SFIC board as soon as the individual organizations have selected their 5 representatives, something that should take place before December 1st of this year. The transition board will elect a Transition President, Vice President, and

Secretary/Treasurer that will serve in these roles until the associations have officially joined as a single body. This could happen as early as next Summer, but this is not a certainty.

Additionally, a process was defined for electing the board once the transition process is completed. *Any NASF member* will be eligible for consideration as a candidate for the 15 member board. Although folks may not self-nominate, there will be open nominations from which a 6-member nominating committee will select a slate they will submit to the transition board for final approval. Elections to the board will be by the general membership of all three associations. Furthermore, initially 5 candidates will be elected to one-year terms, 5 to two-year terms, and 5 to three-year terms. Subsequent elections will all be for 5 members that will serve three-year terms. This elected board will select the first official NASF President, Vice President, and Secretary/Treasurer that will all serve one-year terms. These officers will not be those that served *in this capacity* on the transition board. The elected board will also appoint individuals to serve on an “as-needed” basis to consult on financial matters and legal matters, such as creation of an annual budget and appropriate bylaws.

Another element of the governance structure was the creation of a tiered dues schedule that essentially mirrors the existing dues paid by various members, both corporate and individual. Specifically, 7 tiers were defined, with suppliers – by virtue of the higher dues they pay based on their sales – comprising the top 4 tiers. Job shops that have been part of the NAMF structure in the past are the 5th tier, and individual members make-up the remaining two tiers.

The tiered dues structure led to the creation of a weighted voting system that generally reflects the tiered dues paid by various corporate members, versus those paid by individual members.

3. As just described, the NASF will include individual memberships, corporate memberships, and institutional memberships. This last category is intended to attract academics, students, and retirees. Additionally, the NASF will initiate a concerted effort to attract members from the captive shop community, an industry segment that has been under-represented in the past.

4. The myriad of existing and often overlapping committees in the current associations will be replaced by 7 Councils. The Councils will report to the 15 member board, but they will be headed by individuals other than members of the board. The Councils will include at least the following:

A. *Technical/Education Activities*. This Council will oversee such matters as standards, best *technical* management practices, emerging technologies, etc.

B. *Metal Finishers/Management.* This Council will oversee and organize such activities as best *business* management practices, networking opportunities, group insurance, standard shop procedures, etc.

C. *Marketing/Membership.* This Council will oversee membership promotion, industry awards, scholarships, etc. Additionally, one of the Council's main interests will be strengthening and developing the local association activities. Wherever it is appropriate *and* practical to do so, affiliates and branches will be encouraged to explore combining as "Chapters," but the final decision of whether to do this or not, will remain at the local level.

D. *Events.* This Council will be responsible for organizing and promoting industry events such as SUR/FIN[®], the Washington Forum, the Winter Convention, Finishing Tech, the Airlines and Aerospace Plating Forum, and various free-standing symposia, etc.

E. *Supplier Interests.* This Council will oversee activities of specific interest to the supplier community, such as the Surface Finishing Market Research Board; effective methods for designing and marketing finishing equipment; providing equitable relationships between manufacturers and distributors; assuring the proper and safe use of chemicals; tracking availability and pricing trends in the world market for metals; etc.

F. *Communication and Industry Promotion.* This Council will oversee activities dealing with web sites, public relations, general promotion of Surface Finishing via programs such as the Bright Design Challenge, etc.

G. *Government Affairs.* This Council will assist in the coordination of advocacy efforts that affect the finishing industry, as well as assist in fund raising efforts needed to combat unreasonable and unfair regulatory policies that may be proposed from time to time by government agencies.

Additionally, the funds that AESF has restricted to be used solely for educational purposes will be used to create a *separate Foundation* to oversee activities that will include at least the following: technical education programs; scientific achievement awards; research and development programs; publication of the *Journal of Surface Finishing*; etc.

5. Considerable time was spent ensuring the financial viability of the new association. An in-depth analysis proved that the pooling of the restricted and unrestricted funds from the existing three individual associations was more than sufficient to ensure the NASF can become an affordable reality. As was mentioned earlier, the retreat group concluded dues for each category of membership should remain the same as they are currently, for at least the first year.

The AESF, NAMF, and MFSA boards have all had this same summary presented to them. Additionally, it has been

presented to several AESF and NAMF local branches and affiliates. In every case, the reception has been extremely positive.

In conclusion, a tremendous amount of effort went into creating this structure for the NASF. All 21 participants had an equal say in providing input for the group's consideration. It is a measure of the dedication of the group that they were able to reach unanimous agreement. The group encourages all members of the Surface Finishing Industry to embrace the NASF with the same enthusiasm with which it has been born out of their vigorous discussion and strong cooperation.

The Retreat Committee included the following individuals:

Bob Burger/David Jacobs (NAMF)

Dan Cunningham (NAMF)

Paul Frank (AESF)

Peter Gallerani (AESF)

Pat Gleason (AESF)

Jeff Higdon (NAMF)

Mike Kelly (NAMF)

John Kinne (MFSA)

Ray Lucas (NAMF)

Bob McBride (NAMF)

Bob McIntyre (MFSA)

Mike McMonagle (NAMF)

Fred Mueller (AESF)

Jerry Phillips (AESF)

Tony Revier (MFSA)

Eric Roiter (MFSA)

Bill Saas (MFSA)

David Schram (MFSA)

Richard Thibodeau (AESF)

Scott Walker (MFSA)

Joelie Zak (AESF)

NEWS FROM OAMF

The OAMF board is preparing for the 2006 term. We have a couple of new individuals interested in becoming more involved in the board and in the association in general. If you have an interest in serving the association on a local level, please contact Cheryl Banaszak at 440-667-3757.

The slate of officers for the 2006 term will go out by the end of December.

The board is also contemplating switching the newsletter to an electronic format. If you have any thoughts on this or any other issues, we would love to hear from you.

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