



NASF Update

Florida Finishers 8th Annual Mid-Winter Conference

St. Petersburg, Florida

February 7, 2018

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“This is more work than in my previous life, I thought it would be easier.”

- **Donald Trump**
Interview with Reuters, 4/28/17

“I never realized how big it was. Every decision is much harder than you’d normally think.”

- **Donald Trump**
Interview with the Associated Press, 4/21/17

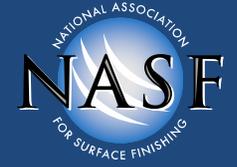
Rocket Man Vs. Deranged Dotard



“In the year since Trump’s election, the S & P 500 Index has notched at least 60 record highs and risen 21.1%.”

-Associated Press, 11/9/17

Regulatory Reform Is Hot



Regulatory Reform Actions



- **Priebus Memo – Regulatory Freeze Pending Review (Jan 20th)**
- **Presidential Memo – Streamlining Permitting and Reducing Burdens on Domestic Manufacturing (Jan 24th)**
- **EO 13771 – Reducing Regulations and Controlling Regulatory Costs (Jan 30th)**
- **EO 13777 – Enforcing the Regulatory Reform Agenda (Feb 24th)**

Priebus Memo



Instructs federal agencies to:

- Delay sending any new material to the Federal Register for publication until it can be reviewed by “a department or agency head appointed or designated by the President after noon on January 20, 2017”
- Withdraw any regulations, including proposed rules, final rules, and guidance documents, which have been sent to the Federal Register, but have not yet been published, so that they may be reviewed by the new Administration.
- Delayed until March 21, 2017, the implementation of any final rules or guidance documents that have been published, but have not yet become effective, and consider proposing to delay implementation beyond that date. Those regulations are to be reviewed by Trump-appointed or -designated agency heads in consultation with the Office of Management and Budget (OMB).
- The memorandum does not apply to regulations that are subject to statutory or judicial deadlines.
- The OMB Director may also exempt regulations from these limitations if they are for emergency situations, or “other urgent circumstances relating to health, safety, financial, or national security matters.”

Streamlining Permitting and Reducing Burdens



- In January, the Trump administration asked U.S. manufacturers to recommend ways the federal government could cut regulations in order to approve projects more easily
- On March 7th the U.S. Department of Commerce (DOC) issued a Request for Information on burdensome regulations impacting the ability of U.S. manufactures to do business and how acquiring federal permits and complying with Federal regulations on constructing, expanding, or operating manufacturing facilities are harming U.S. manufactures.
- The National Association of Manufacturers brought together representatives from 100 companies and Commerce Department staff on March 27th to discuss suggestions
- The administration received approximately 200 comments
- The Trump administration indicates it is “inclined” to accept many of these recommendations
- The U.S. Chamber of Commerce estimates that the repeal of EPA regulations issued under Obama would avoid a loss of \$70 billion annually

Reducing Regulations and Controlling Regulatory Costs (“One In, Two Out”)



Requires agencies to eliminate two regulations whenever they issue a new one.

Requirement does not apply to:

- independent regulatory agencies (such as the NLRB, the Consumer Product Safety Commission, the Federal Reserve Board, and the. These agencies are welcome to follow the “one in, two out” policy, but cannot be compelled to do so because the heads of these agencies do not serve at the president’s pleasure
- Routine regulatory activities of the federal government (i.e., those that impose little or no costs and implement vital governmental functions)
- Regulations that implement spending programs (such as Medicare and Medicaid)
- Regulations necessary to respond to emergencies involving critical health, safety of financial matters (agencies may also apply for a waiver to act immediately if there is some other compelling reason), and
- Regulations that are mandated by law (i.e., those regulations where Congress requires the executive branch to issue a regulation by a specific date.

One In, Two Out Order



- Federal agencies cannot issue discretionary regulations without first satisfying the “one in, two out” requirement.
- Before imposing new regulatory burdens, agencies will have to assess the cost and benefits of the new rule and eliminate two existing rules that may impose burdens.
- Rather than dismantling the existing administrative state, the most likely impact of this process will be to discourage new discretionary regulations, unless existing and unjustified regulatory burdens can be eliminated.

Enforcing the Regulatory Reform Agenda



Calls for the official designation of “Regulatory Reform Officers” and “Regulatory Reform Task Forces” in each federal agency, including the EPA and OSHA.

The reform officers are charged with implementing the following three executive orders:

- **E.O. 13771, Reducing Regulation and Controlling Regulatory Costs, issued by President Trump on January 30, 2017 (the so-called “one in, two out” order)**
- **E.O. 12866, Regulatory Planning and Review, issued by President Clinton on September 30, 1993 (requires cost-benefit analysis of new regulations and approval by the Office of Information and Regulatory Affairs in OMB) and**
- **E.O. 13563, Improving Regulation and Regulatory Review, issued by President Obama on January 18, 2011 (calls for a retrospective review of existing regulations with a goal of eliminating those that do not make sense).**

Enforcing the Regulatory Reform Agenda

The Regulatory Reform Task Force in each agency shall evaluate existing regulations and attempt to identify regulations that:

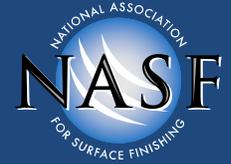
- eliminate jobs, or inhibit job creation;
- are outdated, unnecessary, or ineffective;
- impose costs that exceed benefits;
- create a serious inconsistency or otherwise interfere with regulatory reform initiatives and policies;
- rely in whole or in part on data, information, or methods that are not publicly available or that are insufficiently transparent to meet the standard for reproducibility; or
- derive from or implement Executive Orders or other Presidential directives that have been subsequently rescinded or substantially modified.



Enforcing the Regulatory Reform Agenda



- The Task Forces are specifically directed to seek input from those groups impacted by regulations, including small businesses, consumers, nongovernmental organizations, trade associations, and state, local and tribal governments.
- Federal agencies have requested comments and input from stakeholders. For example, EPA conducted public meetings and conference calls and solicited written comments.
- Following this evaluation process the Task Force will make recommendations to the agency head regarding which regulations should be repealed, replaced, or modified, consistent with applicable law.



NASF Comments on Regulatory Reform

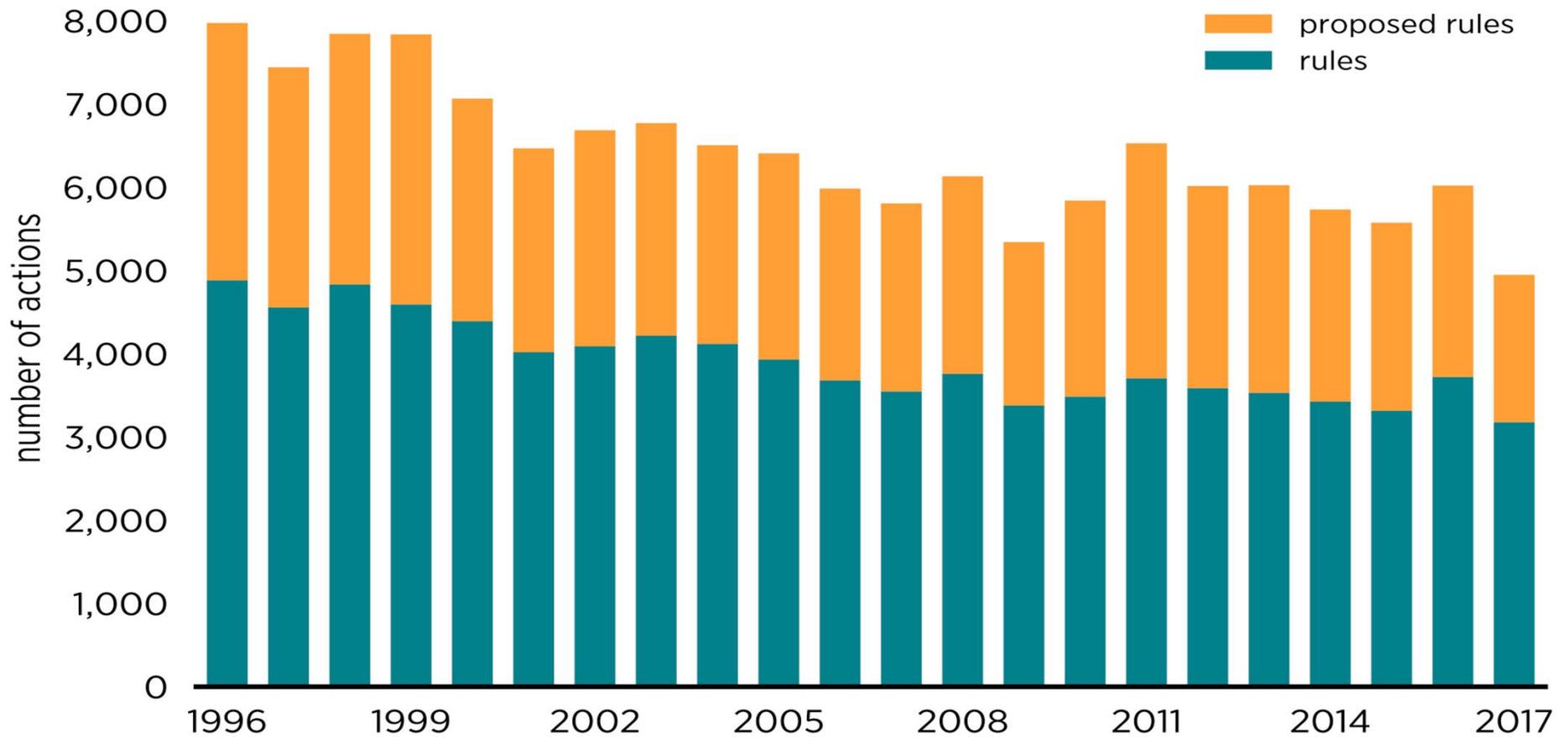
NASF Submitted Comments on May 15, 2017

- Need for regulatory reform
- Revisions to ELGs
- Chromium electroplating NESHAP
- Plating and polishing rule
- Stormwater management
- WOTUS
- Definition of solid waste and recycling
- F006 hazardous waste listing
- Hazardous waste generator improvement rule
- TRI & manufactured metal compounds
- CERCLA financial assurance regulations
- TSCA reform regulations
- Clean power plan and GHG emissions
- Ozone NAAQS

Final and Proposed Rules Since 1996



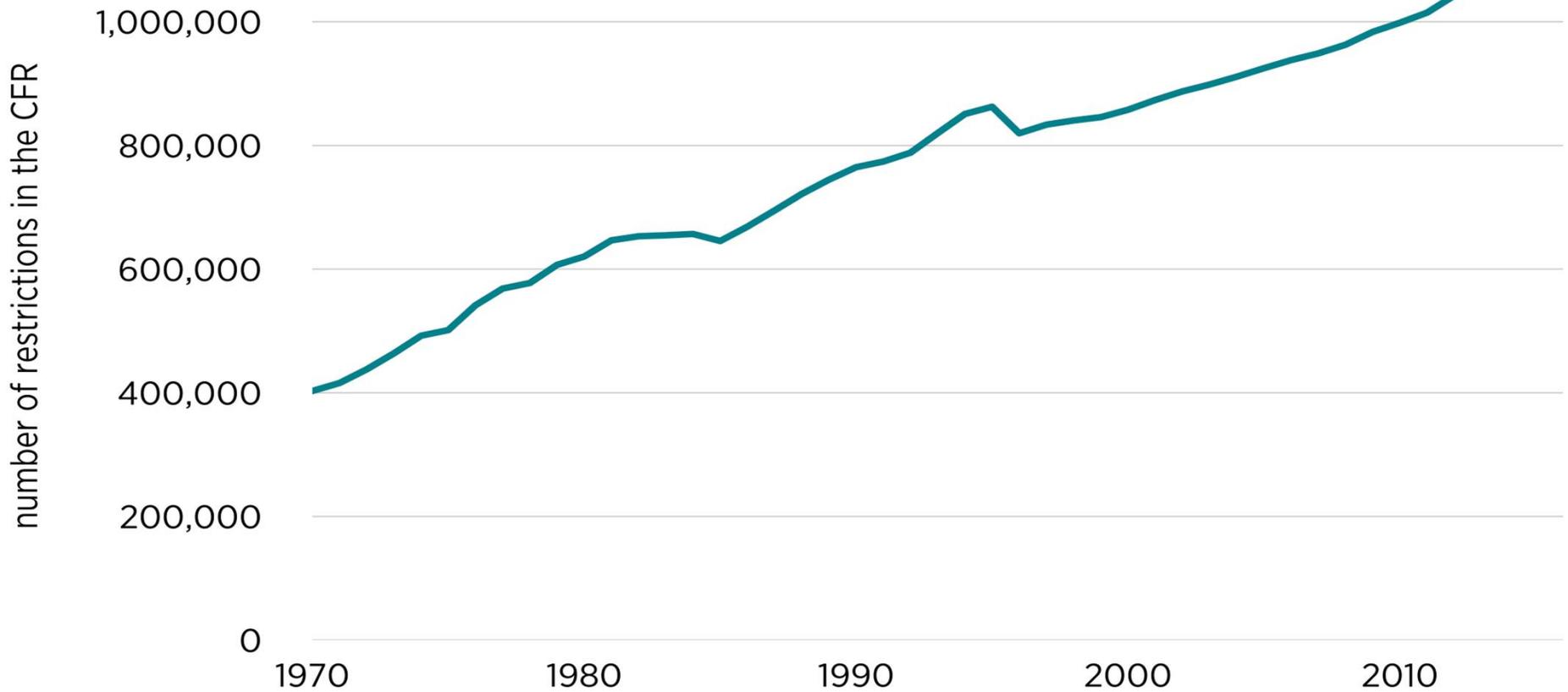
Rules and Proposed Rules in the Federal Register, 1996–2017



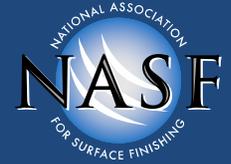
Accumulated Regulatory Restrictions



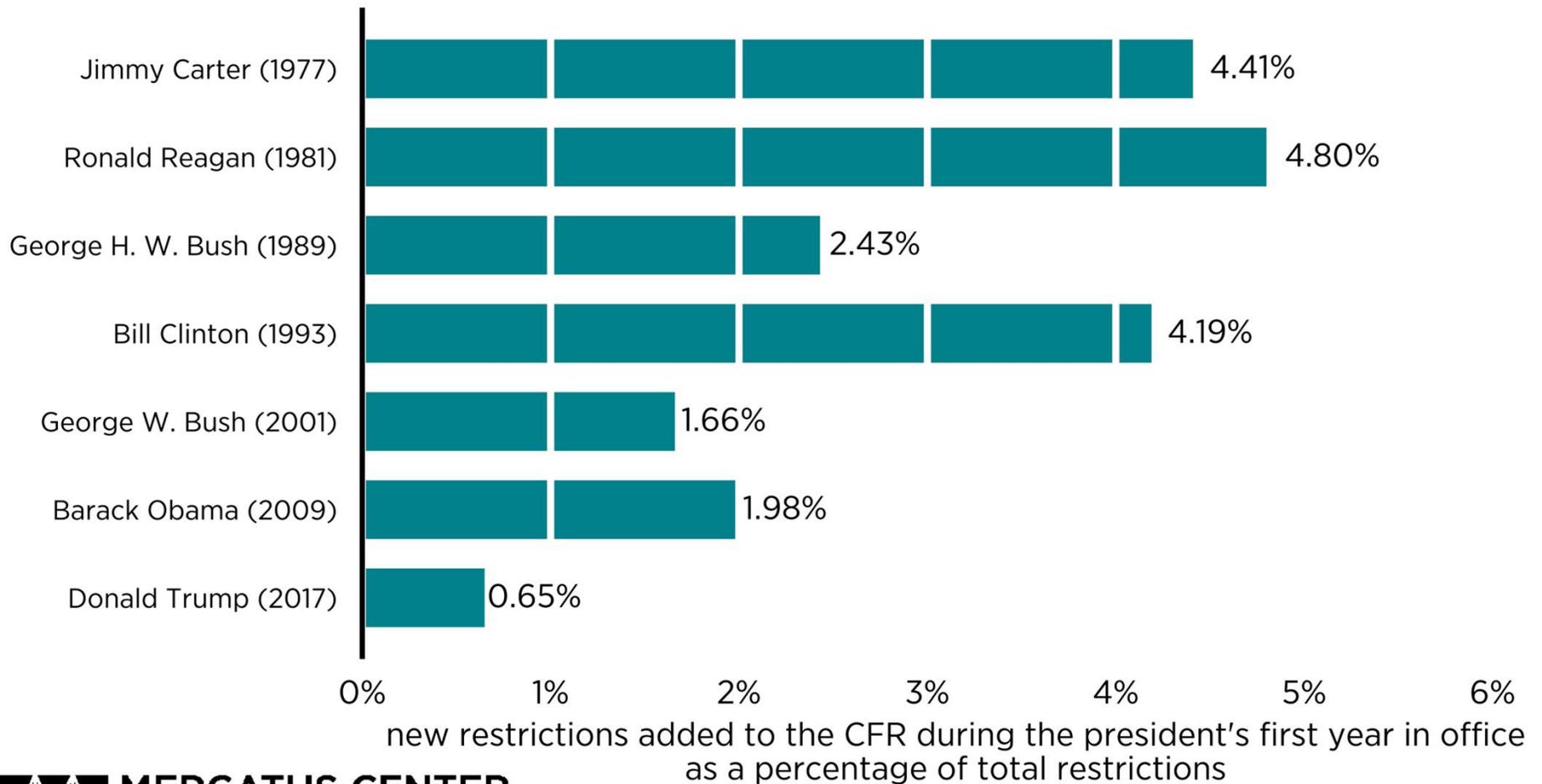
Number of Restrictions in the CFR by Year



New Regulatory Restrictions by President



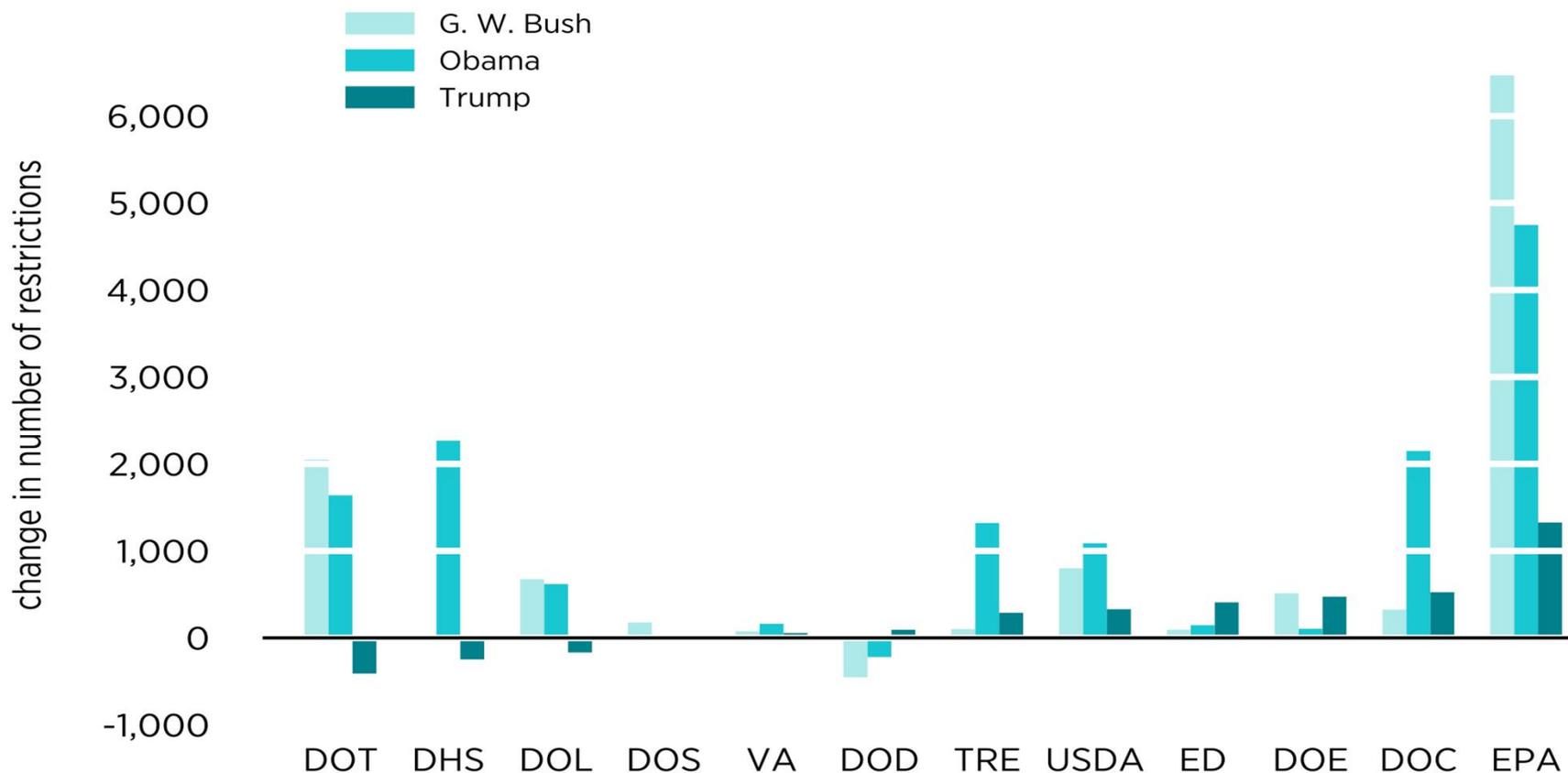
Regulatory Restrictions Added during the President's First Year, 1977-2017



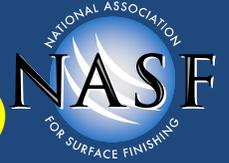
Regulatory Restrictions by Agency



Changes in Regulatory Restrictions during the First Year of the Three Most Recent Presidencies for Cabinet-Level Departments and Agencies



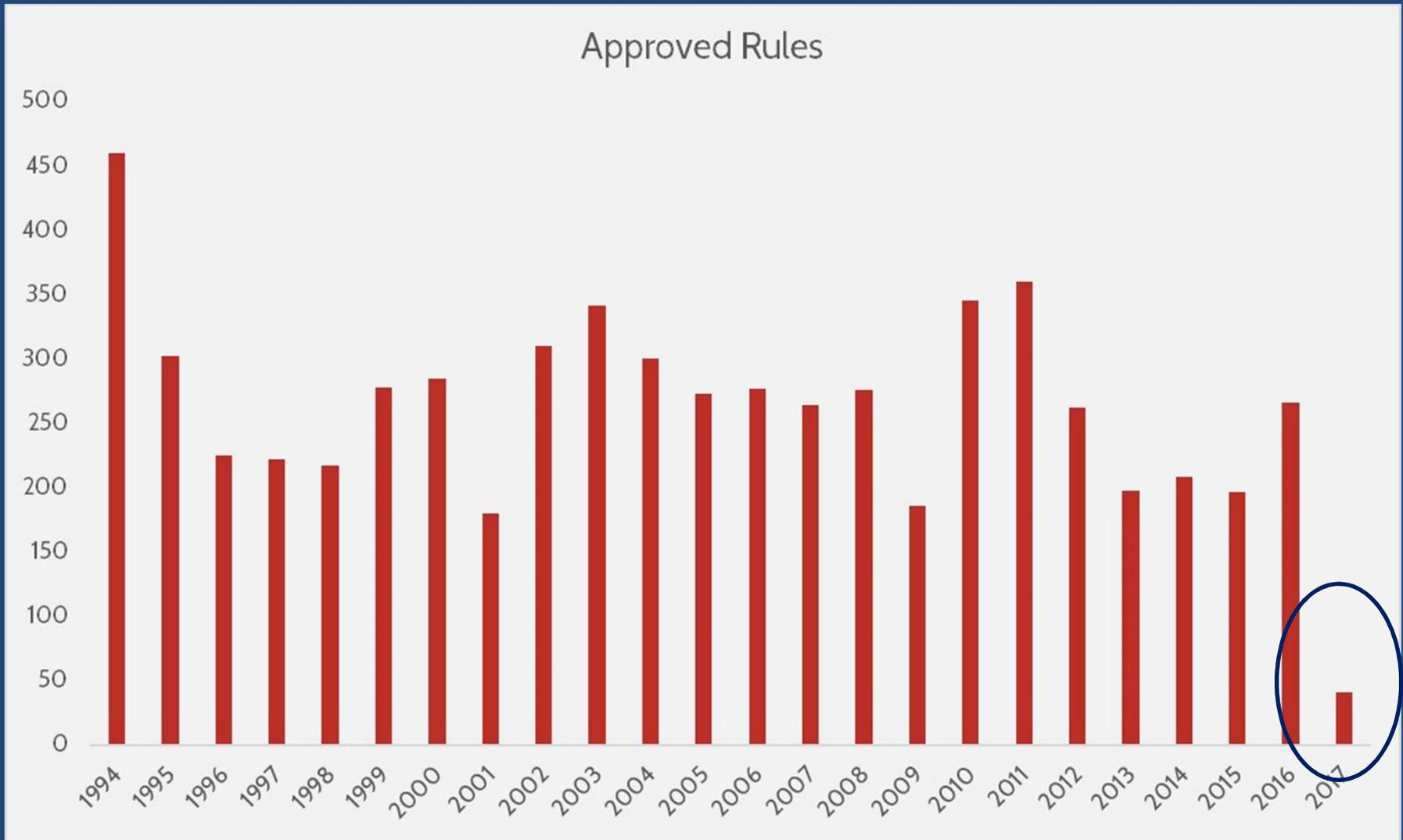
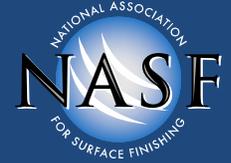
Number of "Major" Federal Rules Approved First Six Months of Year, 1994 – 2017 (Economically Significant Rules)



"Economically Significant" Approved

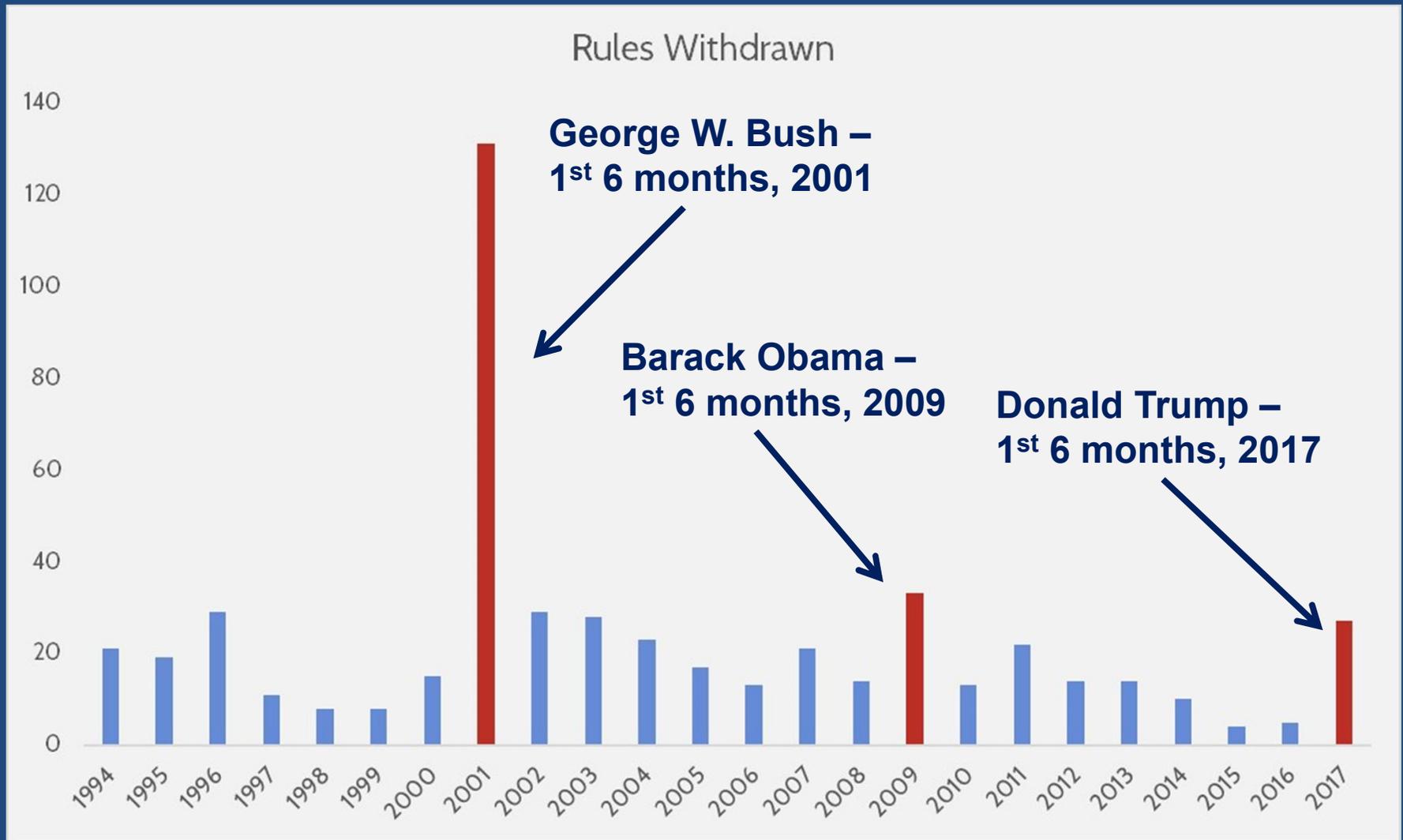


Number of “Non-Major” Federal Rules Approved First Six Months of Year, 1994 – 2017 (Non-Economically Significant)

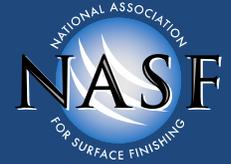


Federal Rules Withdrawn

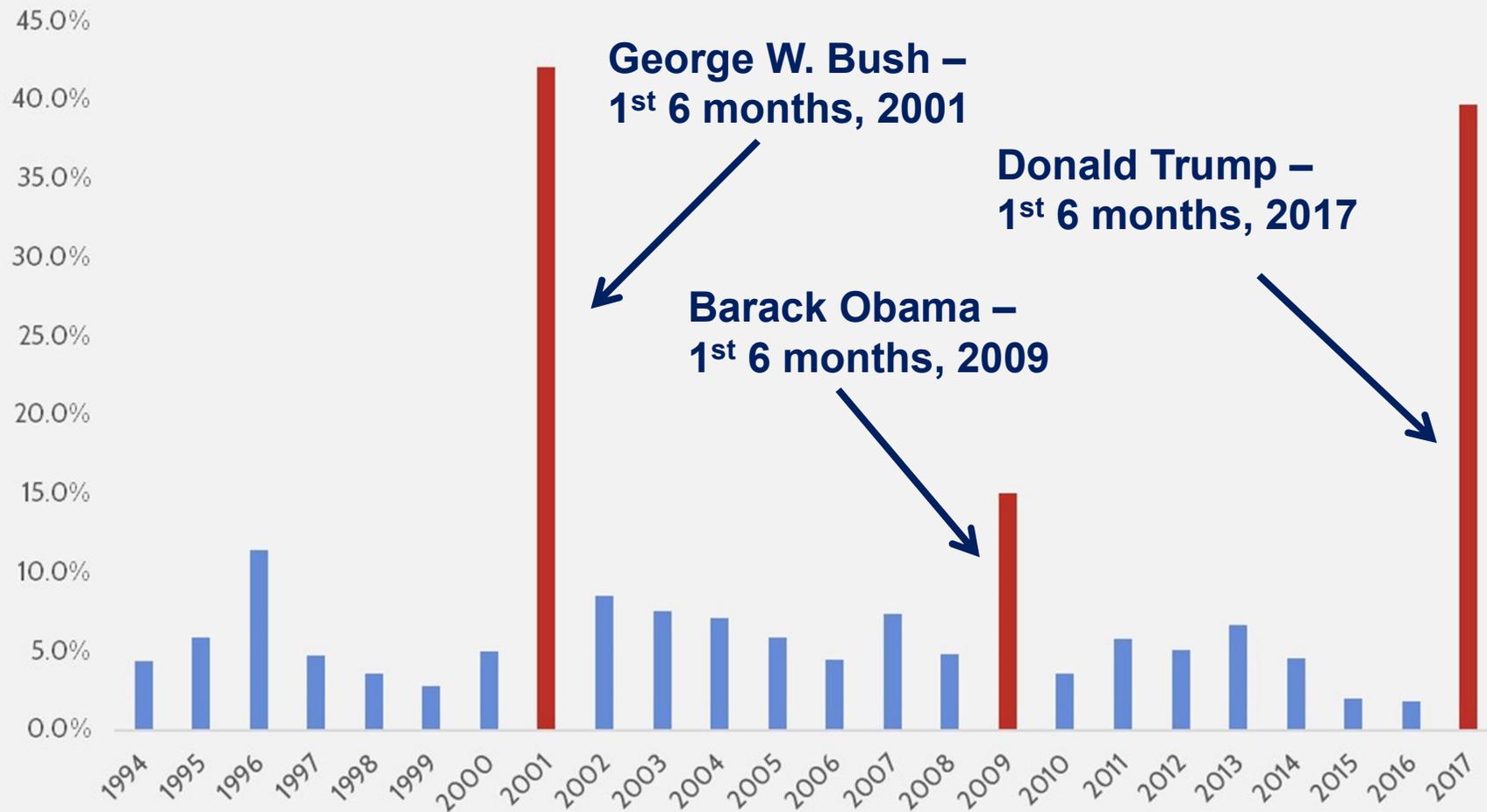
First Six Months of Year, 1994 – 2017



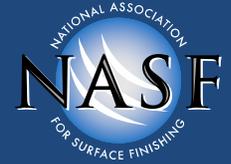
Withdrawn Rules: As Percentage of All Rules Reviewed First Six Months of Year, 1994 – 2017



Withdrawn Rules As Percentage of All Rules Reviewed



Regulatory Reform in Practice

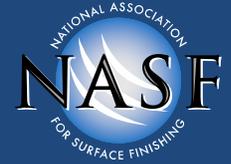


Number of Federal Register Pages

- *December 29, 2017 – 61,949*
- December 30, 2016 – 97,110
- December 31, 2015 – 82,035
- December 31, 2014 – 79,066
- December 31, 2013 – 80,462
- December 31, 2012 – 77,249
- December 30, 2011 – 82,419
- December 30, 2010 – 82,589



EPA Leadership



- Andrew Wheeler – Deputy Administrator (Re-Submitted)
- Matthew Leopold – General Counsel (Confirmed)
- Susan Bodine – OECA (Confirmed)
- Bill Wehrum – Air (Confirmed)
- David Ross – Water (Confirmed)
- Michael Dourson – Chemicals and Pesticides (Withdrew)
- Samantha Dravis – Policy (Confirmed)

Superfund Task Force Recommendations



- Focus on Sites that Have Taken Too Long to Remediate
- Third-Party Investments in Cleanups to Accelerate Cleanups and Promote Reuse of NPL Sites
- Sites with Remedies Already Selected Will Be Priorities for Faster Completion and Deletion from NPL
- Site Assessments and Investigations Expedited by Applying new Technologies and Approaches
- EPA to Provide PRPs with Inducements and Deterrents to Complete Negotiations and Cleanup Commitments in Timely Manner
- Develop Stronger Stakeholder Relationships

RCRA Definition of Solid Waste



- Vacates “Verified Recycler” Exclusion from 2015 Rule
- **Reinstates “Transfer-Based” Exclusion from 2008 Rule**
- Vacates “Toxics Along for the Ride” Legitimacy Factor
- Secondary Materials Sent Off Site for Legitimate Recycling Are Not Discarded, So Not Subject to Waste Regulations
- **Waste Water Treatment Sludge (F006) Sent Off Site for Recycling Not Discarded, Not a Waste**
- Need to Approach States on Implementation of Court Decision

Dismantling the WOTUS Rule



- Final rule issued (June 26, 2015)
- Legal challenges to the rule
- U.S. District Court (ND) invalidated rule in 13 states (Sept 4, 2015)
- 6th Circuit issues nationwide stay of the rule (Oct 9, 2015)
- President Trump signs EO directing EPA and Army Corps to review rule and issue notice and comment for a proposed rule rescinding or revising the rule (Feb 28, 2017)
- EPA and Army Corps proposed to rescind final rule and recodify pre-existing rule (July 27, 2017)
- U.S. Supreme Court rules that district courts had proper subject matter jurisdiction with authority to issue stay (January 22, 2018)
- EPA extended effective date of WOTUS 2 more years (February 1, 2018)



United States
Environmental Protection
Agency

Final 2012 and Preliminary 2014 Effluent Guidelines Program Plans

September 2014

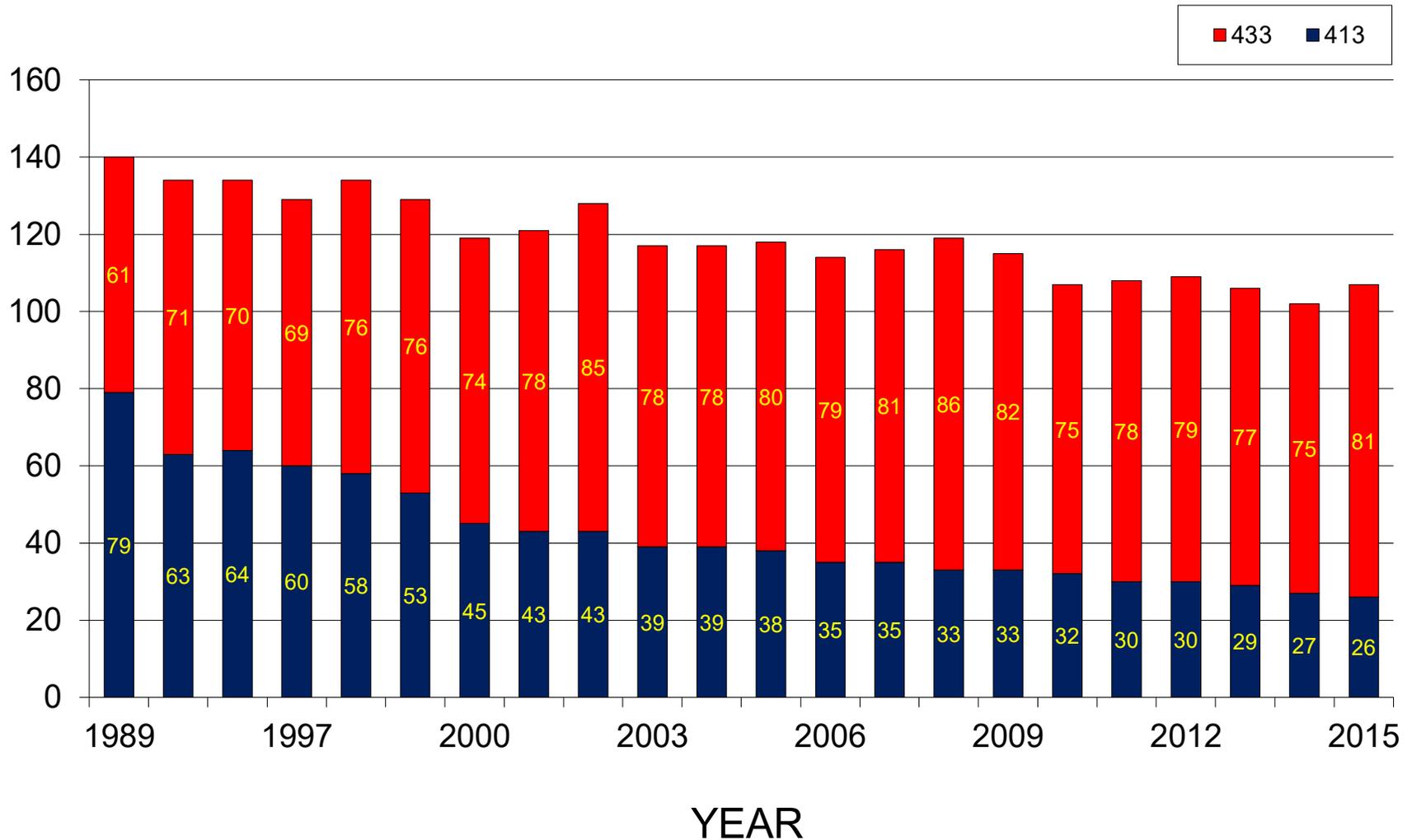
Address New Regulatory Challenges



- EPA Continues to Review Metal Finishing Category & Discharge Limits
- **EPA's Preliminary Review Identified Several Topics that Warrant Further Review**
 - Potential new pollutants of concern not currently regulated that are increasingly used in metal finishing processes.
 - EPA Concerns Regarding Applicability of New Processes
 - NASF Submitted Information for EPA's Consideration
- EPA to Make Decision in Early 2018 on Whether Revisions Needed

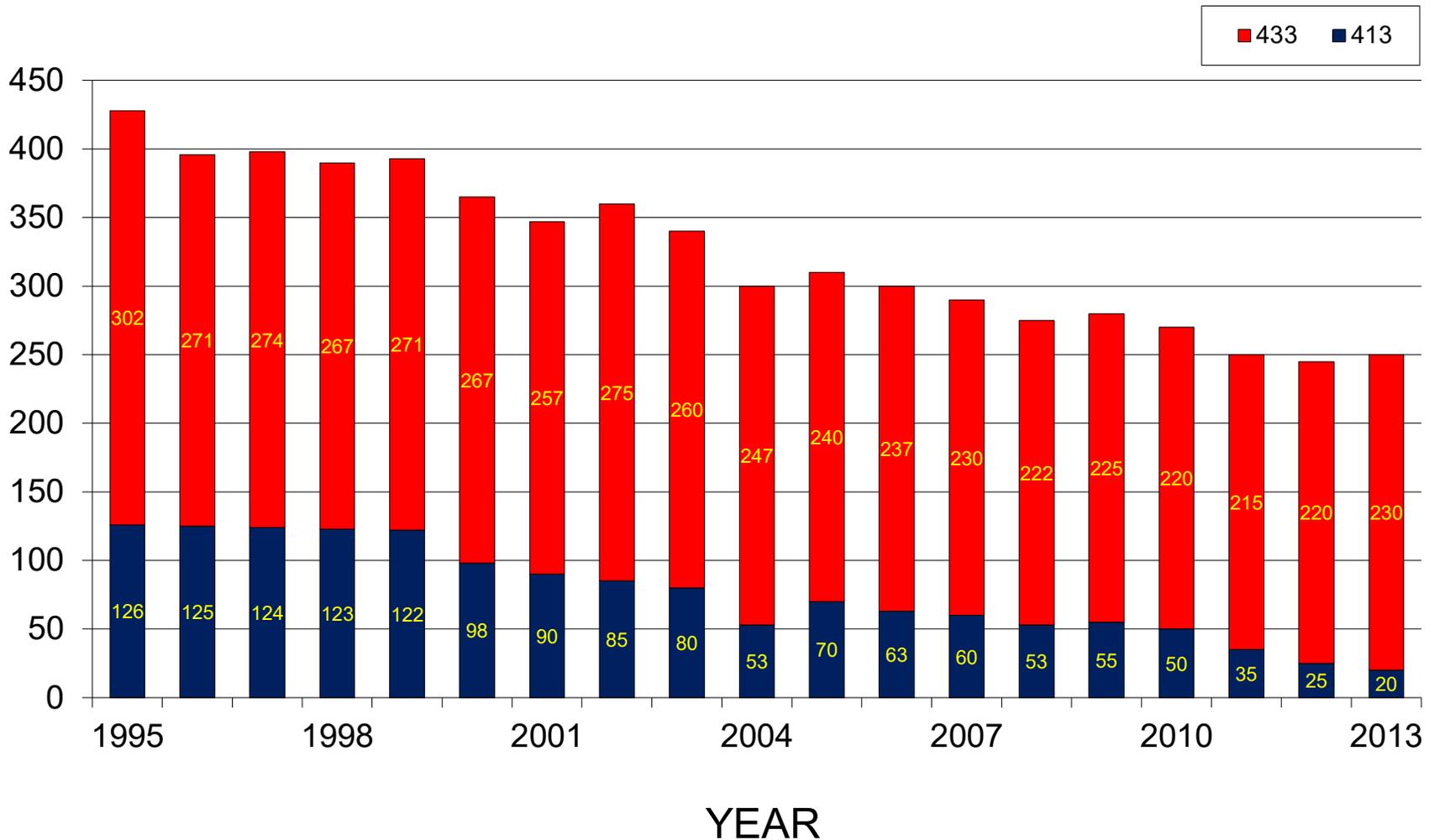
Trends in Surface Finishing Permits, 413 v. 433 Cleveland

CLEVELAND
NUMBER OF USERS SUBJECT TO PARTS 413 & 433



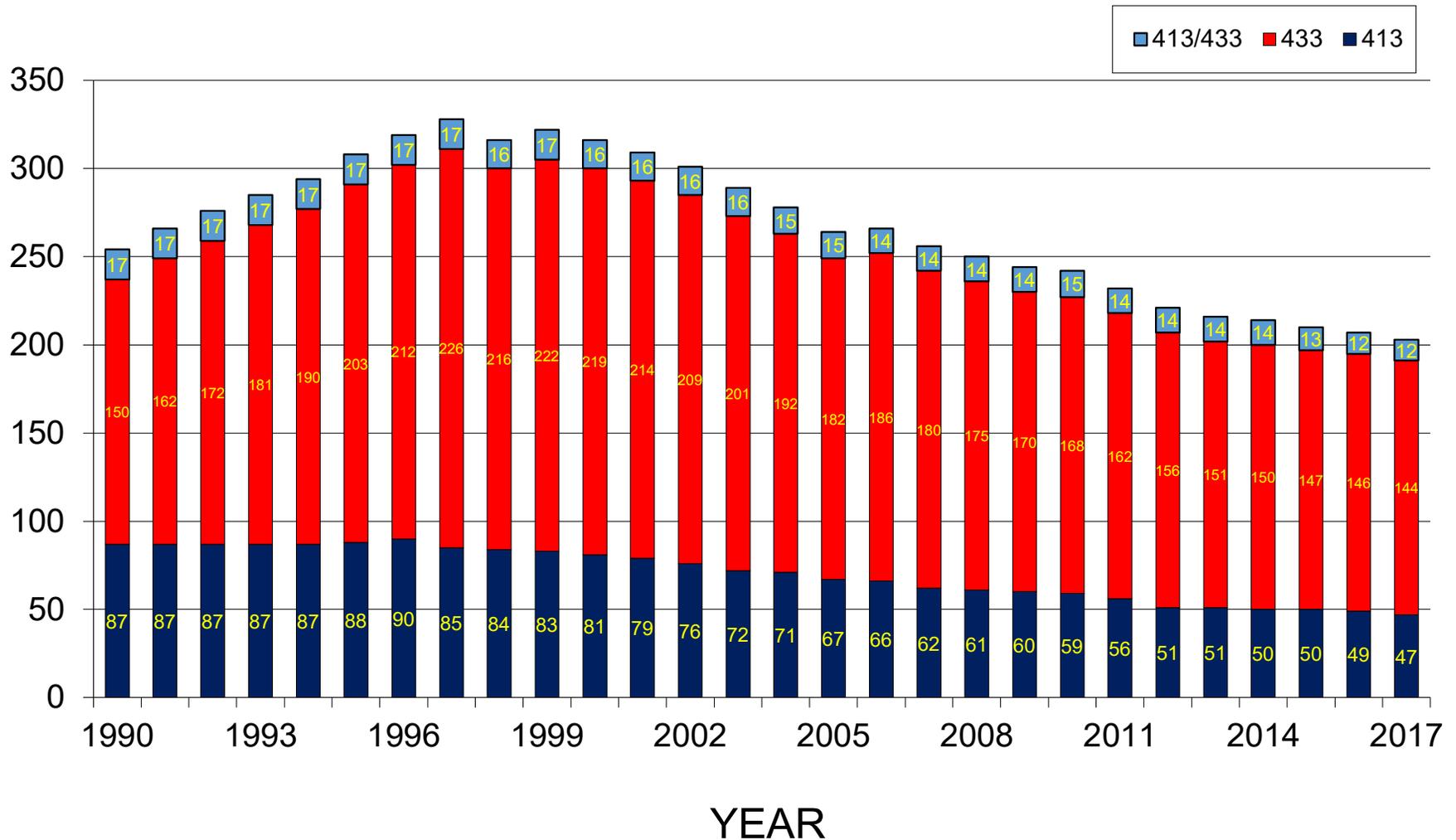
Trends in Surface Finishing Permits, 413 v. 433 Los Angeles

LOS ANGELES
NUMBER OF USERS SUBJECT TO PARTS 413 & 433



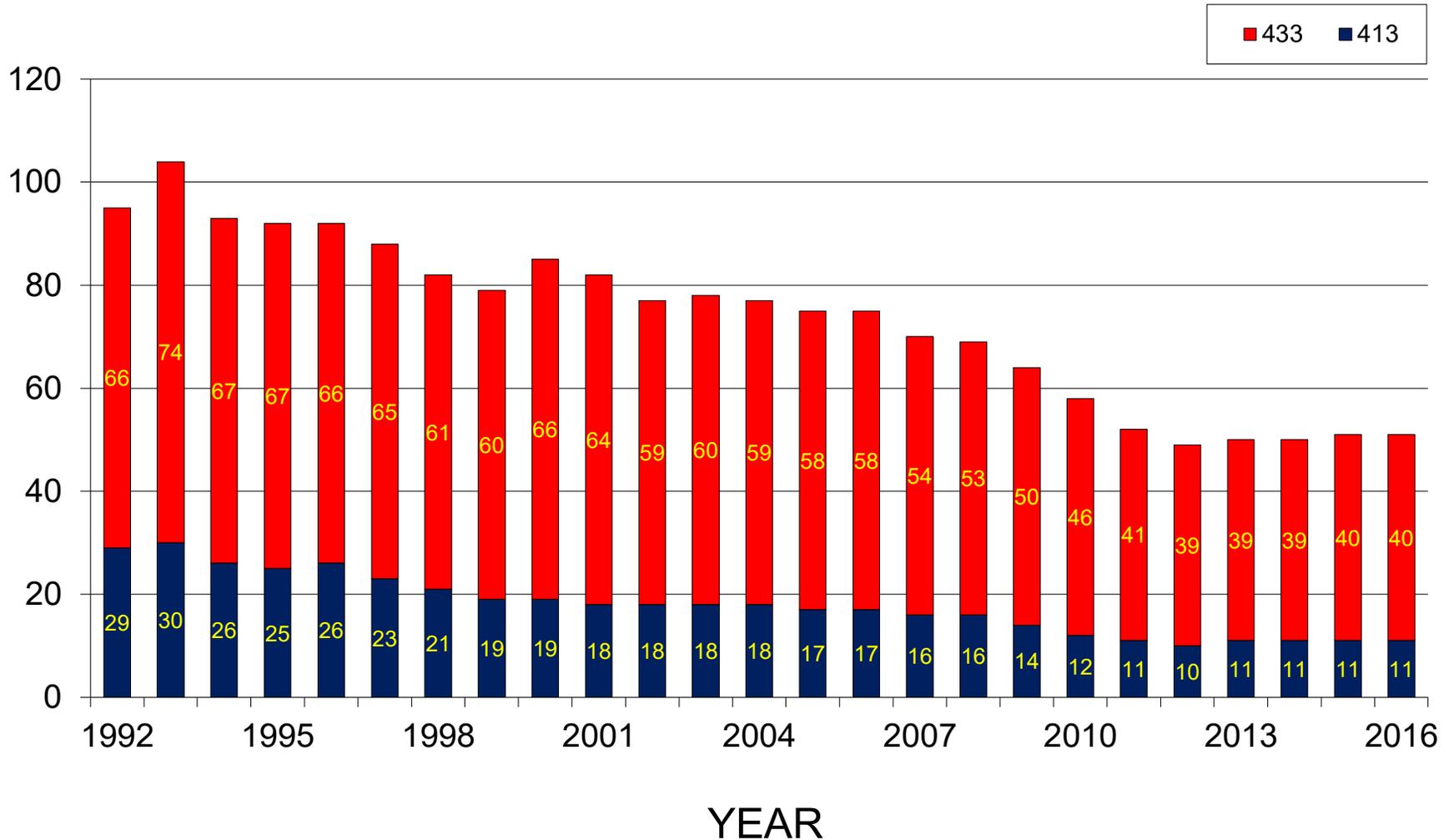
Trends in Surface Finishing Permits, 413 v. 433 Chicago

CHICAGO
NUMBER OF USERS SUBJECT TO PARTS 413 & 433



Trends in Surface Finishing Permits, 413 v. 433 Milwaukee

MILWAUKEE
NUMBER OF USERS SUBJECT TO PARTS 413 & 433



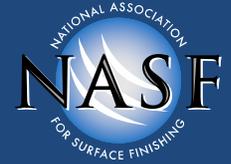
Industry Reductions 1992 -2016



25 Year Change in Permitted Categorical Dischargers

Los Angeles					Cleveland				Milwaukee			
	413	433	Total		413	433	Total		413	433	Total	
1992	131	297	428	1992	79	61	140	1992	29	66	95	
2016	28	222	250	2016	26	83	109	2016	11	40	51	
%	-	-	-	%	-	-	-	%	-	-	-	
Change	78.6%	25.3%	41.6%	Change	-67.1%	36.1%	22.1%	Change	-62.07%	39.4%	46.3%	
Chicago					Grand National Average							
	413	433	Total		413	433	Total					
1992	87	172	259	1992	326	596	922					
2016	49	146	195	2016	114	491	605					
%	-	-	-	%	-	-	-					
Change	43.7%	15.1%	24.7%	Change	-65.0%	17.6%	34.4%					

Metal Finishing Loadings Milwaukee Study



QUANTIFIABLE BASIS (LBS/DAY)

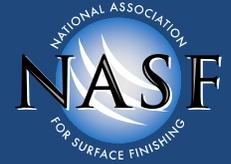
	Cadmium	Chromium	Copper	Cyanide	Lead	Nickel	Silver	Zinc
2014	0.05	1.20	3.19	0.34	0.15	1.20	0.06	4.00
2015	0.00	1.36	2.80	0.15	0.05	1.44	0.07	4.73
2016	0.00	0.84	2.33	0.04	0.02	1.34	0.03	2.04
AVG	0.02	1.13	2.77	0.18	0.07	1.33	0.05	3.59
AVG/FAC	0.0005	0.0263	0.0644	0.0042	0.0016	0.0309	0.0012	0.0835

1989 - 1992 Study vs 2014 - 2016 Study



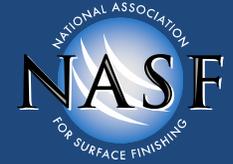
QUANTIFIABLE BASIS

	1989-1992 AVG LBS/DAY TOTAL	1989-1992 AVG LBS/DAY PER USER	2014-2016 AVG LBS/DAY TOTAL	2014-2016 AVG LBS/DAY PER USER	% REDUCTION TOTAL	% REDUCTION PER USER	1989-1992 % MMSD INF	2014-2016 % MMSD INF
CADMIUM	0.93	0.0096	0.02	0.0005	97.8	95.1	13.7	1.5
CHROMIUM	13.3	0.1371	1.13	0.0263	91.5	80.8	1.1	1.9
COPPER	9.3	0.0959	2.77	0.0644	70.2	32.8	4.2	2.7
CYANIDE	NA	NA	0.18	0.0042	NA	NA	NA	NA
LEAD	2.9	0.0299	0.07	0.0016	97.6	94.6	2.7	0.2
NICKEL	8.6	0.0887	1.33	0.0309	84.5	65.1	15.4	8.6
SILVER	0.35	0.0036	0.05	0.0012	85.7	67.8	3.1	NA
ZINC	38.2	0.3938	3.59	0.0835	90.6	78.8	9.8	1.6
TOTAL	73.6	0.7586	9.14	0.2126	87.6	72.0	3.6	2.1



Evaluation of Compliance Status

- **Significant noncompliance (SNC)**
- **Chronic violations**
 - 66% or more of all measurements taken exceed by any magnitude the daily maximum limit or the average limit for any one pollutant of concern
- **Technical review criteria violations**
 - 33% or more of all measurements taken for a particular pollutant of concern equal or exceed or exceed the product of the daily maximum limit or the average limit multiplied by 1.2
- **Evaluations conducted every six months**



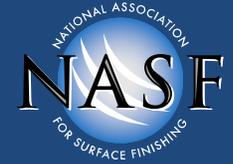
Evaluation of Compliance Status

EVALUATION PERIOD	# OF USERS	# OF USERS IN SNC	% OF USERS IN SNC
JAN - JUNE 1989	82	40	49
JULY - DEC 1989	84	44	52
JAN - JUNE 1990	83	33	40
JULY - DEC 1990	80	24	30
JAN - JUNE 1991	79	19	24
JULY - DEC 1991	75	14	19
JAN - JUNE 1992	75	11	15
JULY - DEC 1992	64	12	19
JAN - JUNE 2014	50	2	4
JULY - DEC 2014	50	3	6
JAN - JUNE 2014	51	7	14
JULY - DEC 2014	51	2	4
JAN - JUNE 2014	51	4	8



Reasons for Industry Reductions

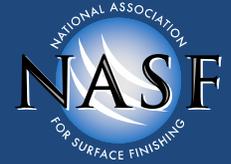
- Improved System Operation
- Survival in Adverse Economic Times
- Better Operational Controls
- Pollution Prevention Techniques



Next Steps

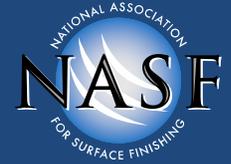
- **Focus on P2 Practices**
- **EPA at Forum & SUR/FIN '16**
- **EPA Site Visits**
- **Metals Loading Study – Presentation to EPA**
- **EPA Grant on Source Reduction Alternatives**
- **Benchmarking Industry on Environmental Performance**
- **EPA Final Decision on Rule**
 - **Need to Wait until Senior Management Is In Place**

PFOS Initiative Michigan & Beyond



- Michigan DEQ found PFOS in Flint River and traced source to chromium etch facility
- PFOS in wastewater discharge despite no additions since before September 2015
- Michigan DEQ set surface water quality standard of 12 ppt
- EPA drinking water advisory level of 70 ppt for PFOS
- NASF met with DEQ, EPA Region V and EPA HQ
- DEQ asking POTWs to start screening for PFOS
- Testing methodology an issue
- Focus on legacy issues and new non-PFOS fume suppressants

State Air Toxics Rules



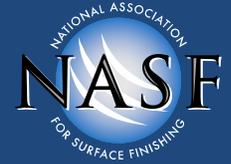
California

- Focus on Fugitive Emissions of Hexavalent Chromium
- SCAQMD Set Ambient Risk Level at 0.2 ng/m³
- Monitoring, Enclosed Building & Controls on Chromate Tanks
- Challenging Science, Policy, Process & Economic Impact

Oregon

- Cleaner Air Oregon Initiative
- Sets Limits on Allowable Risks from Air Toxics
- Prompted by Metals in Water, Air and Soils/Moss

EPA Grant for NASF-NCMS Partnership



U.S. Environmental Protection Agency FY 2016 and FY 2017 Source Reduction Assistance Grant Program Grant Application Package Instructions

Dear Mr. Chenevert:

Congratulations! You are receiving these instructions because your organization submitted an FY 2016 and FY 2017 Source Reduction Assistance (SRA) grant proposal to the U.S. Environmental Protection Agency (EPA) that merited further consideration. EPA is now asking your organization to submit an updated P2 grant application package. Please submit updates to the Project Officer identified below so she can ensure the application package is complete and approvable.

General Application Instructions, FY16 and FY17 Source Reduction Assistance Grants
National Center for Manufacturing Sciences (NCMS)

The final application package must be received (via email) by: **Friday, July 1, 2016.**

Please email the updated application documents to:

olone.kimberly@epa.gov; Kimberly O'Lone, Chief, State and Tribal Services Section
hall.antoINETte@epa.gov; Antionette Hall, Project Officer, State and Tribal Services Section
twickler.donna@epa.gov; Donna Twickler, Technical Contact, Source Reduction Section
anderson.christinea@epa.gov; Christine Anderson, P2 Coordinator, Source Reduction Section

Please note that EPA may not be able to fund you at the full Federal requested amount of \$260,000 (\$259, 540 revised) over the next two years. Therefore we are asking you to prioritize the tasks and include the amount of Federal funding needed to complete the tasks in your workplan. Please attach the spreadsheet previously sent to Region 5 and provide additional information in the workplan on the specifics of these tasks and the fact they would be performed first. Remaining tasks should also be added (with their explanations), as these tasks may be accomplished should full funding become available. Once we have a final FY appropriation from Congress, we will communicate the final Federal award amount and negotiate a revised

Promote Environment, Health & Safety Focus



Some Activities Underway

- Benchmarking Best Practices
- Revising P2 Guidance
- Launching Web Resource
- New Training Curriculum



- HOME
- COMPLIANCE ASSISTANCE
- REGULATIONS
- NASF NEWS
- TOOLS & CALCULATORS
- TRAINING & EDUCATION
- LIBRARY / ARTICLES
- ASK THE EXPERTS
- DIRECTORIES
- NASF MEMBERSHIP
- CONTACT



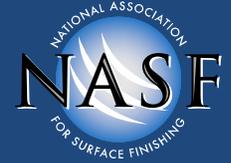
WELCOME TO THE NEW SURFACE TECHNOLOGY ENVIRONMENTAL RESOURCE CENTER

EXPLORE SUPERIOR PLATING SOLUTIONS
Prevent premature part failure through engineered corrosion, friction and wear resistance.

Learn More →

The Surface Technology Environmental Resource Center (STERC), previously known as the National Metal Finishing Resource Center (NMFRC), provides a wealth of useful environmental compliance information to the surface finishing and surface treatment industry. STERC is the result of a new partnership with NCMS, the AESF Foundation and NASF initiated in 2016 and through continued grant funding from EPA.

NASF Partnership and MOU: New NASF Member Benefit with AIAG



Insight. Expertise. Results.

MEMORANDUM OF UNDERSTANDING
Between
AUTOMOTIVE INDUSTRY ACTION GROUP (AIAG)
And
NATIONAL ASSOCIATION FOR SURFACE FINISHING
8/9/2016

Purpose

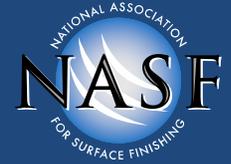
The purpose of the Memorandum of Understanding (MoU) is to define a level of cooperation and communication between the Automotive Industry Action Group (AIAG) and the National Association for Surface Finishing (NASF).

AIAG

AIAG is a not-for-profit trade association of automotive vehicles manufactures and suppliers. The AIAG mission is to improve the productivity of its members and the automotive industry by providing an organization to:

- Foster cooperation and communication between customers and their suppliers to improve business processes

Corporate Sustainability: Supply Chain Impacts



DAIMLER



HONDA

TOYOTA



Automotive Industry Guiding Principles to Enhance Sustainability Performance in the Supply Chain

We endeavor to achieve excellence, innovation and performance in a sustainable manner. People and the environment are the automotive industry's most important resources. For this reason, we are working together to attain the highest standard in business integrity and in the social and environmental performance of our supply chain.

The automotive industry supply chain has a high degree of complexity, therefore we believe in the benefits of a common approach and message. The following guidelines clearly describe our minimum expectations towards business ethics, working conditions, human rights, and environmental leadership, for our suppliers as well as their subcontractors and suppliers. We expect that suppliers will uphold these standards and cascade them down their supply chain.

These guidelines are based on fundamental principles of social and environmental responsibility that are compliant with local law, consistent with international expectations and are supported by the sponsoring Auto Manufacturers. Individual manufacturers may have their own standards, codes and policies that supersede these guidelines.

Business Ethics

The basis for sustainable and successful business activity is to have integrity and transparent business practices. Companies are expected to operate honestly and equitably throughout the

Working Conditions and Human Rights

Child Labor and Young Workers

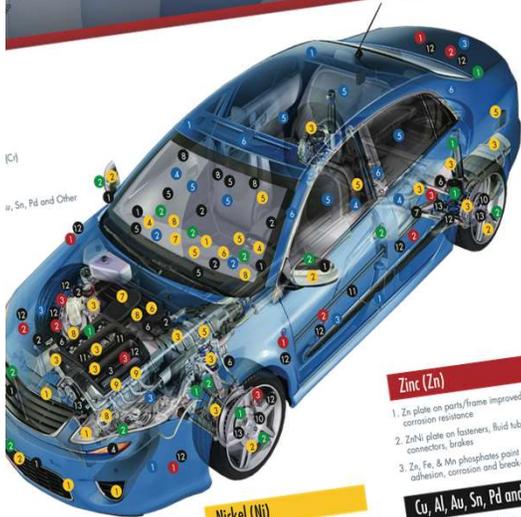
Child labor should not be tolerated and the age of employment must be in accordance with local labor law.

Raising Visibility and Awareness

The Vital Role of Surface Treatment in US & Global Manufacturing



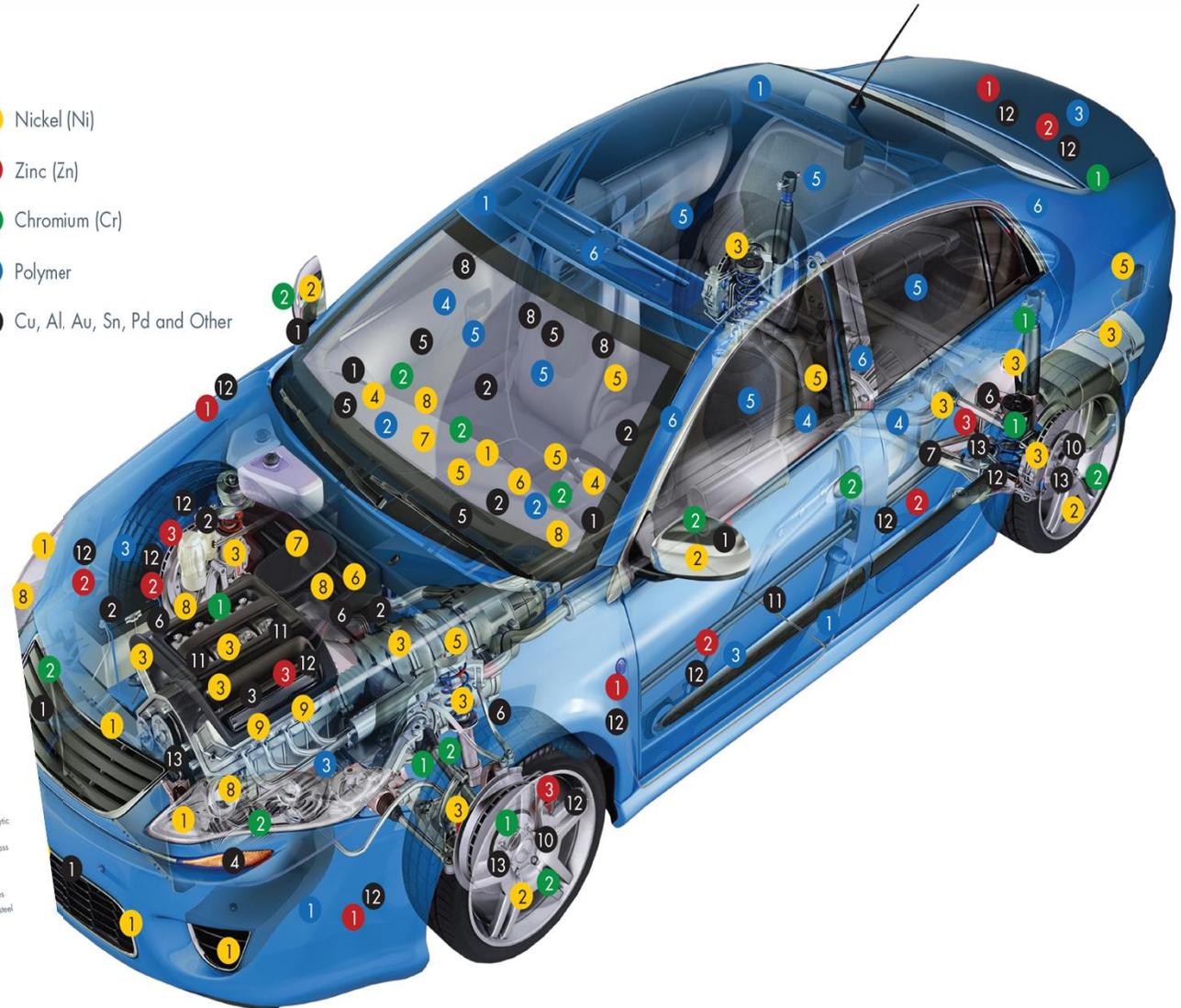
The Surface Technology Initiative Automotive Coatings



(C4)

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- Nickel (Ni)
- Zinc (Zn)
- Chromium (Cr)
- Polymer
- Cu, Al, Au, Sn, Pd and Other



- Polymer**
1. External paint system
 2. Paints on all dashboard gauges, trim, knobs
 3. Aluminum-Zn filled dip-spin fastener coatings
 4. Lubricious polymer coatings on window drives
 5. Fabric and leather coatings - against fire, stains, bacteria, water, static shock
 6. Eco-coat to prevent car frame corrosion

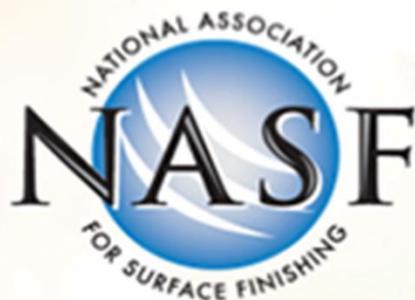
The National Association for Surface Finishing
 1800 M Street Suite 400 S
 Washington D.C. 20036
 P: (202) 457-8404
 F: (202) 530-0659
 NASF.org

- Nickel (Ni)**
1. Electroless Ni for plating on plastic
 2. Ni plate under decorative chrome
 3. Electroless Ni for wear, corrosion - pistons, suspension, brake systems, fuel lines, gears
 4. Ni for decorative trim
 5. Ni plated magnesium to reduce weight
 6. Electroless Ni to stop radio interference
 7. Ni plating for electronic circuits, substrates
 8. Electroless Ni/Pd/Au for wire bond, Pb-free soldering
 9. Electroless Ni/PTE for fuel injectors

- Chromium (Cr)**
1. Hard Cr on valve stems, shocks, brake cylinders, fuel injection nozzles
 2. Decorative Cr on interior and exterior trim, wheels, knobs, insignia

- Zinc (Zn)**
1. Zn plate on parts/frame improved corrosion resistance
 2. ZnNi plate on fasteners, fluid tubes, connectors, brakes
 3. Zn, Fe, & Mn phosphates paint adhesion, corrosion and break-in wear

- Cu, Al, Au, Sn, Pd and Other**
1. Copper under decorative coatings, electronics
 2. Gold, silver, tin on all electronics
 3. Diamond-like carbon on fuel injectors
 4. Aluminum on light reflectors
 5. Hydrographic coatings for "wood" interior trim
 6. Nitrocarburizing for wear components
 7. Platinum, palladium, rhodium for catalytic converters to reduce pollution
 8. Optical coatings - anti-glare, smart glass
 9. Thin aluminum, Cr for car mirrors
 10. Powder coating for wheels
 11. Anodizing - pistons, rings, seat slides
 12. Conversion coatings on Zn, ZnNi, steel
 13. Tin alloy coatings for bearings



LEADERSHIP CONFERENCE

FEBRUARY 25 – MARCH 1, 2018
KOLOA, KAUAI, HAWAII



Conference Chair:

Erik Weyls

Coventya, Inc.

NASF Washington Forum, April 16-18, 2018

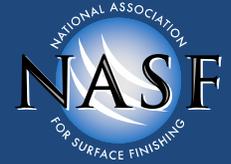


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NASF 1000



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Thank you

The Government Advisory Committee

QUESTIONS



For More Information, Contact:

Jeff Hannapel

The Policy Group

jhannapel@thepolicygroup.com

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