

Supplying and servicing your coating, adhesive, abrasive and application equipment needs since 1971

Message from the CEO



Dan Iannuzzi

Since 1971, Camger Chemical Systems has provided OEM manufacturers with the highest quality products and ongoing technical assistance. We serve the wood, metal, plastic, specialty athletic field marking, and other coatings industries.

Over the past several years, we have expanded our product lines, and now manufacture a wide variety of products designed to meet customers' specific performance and regulatory needs.

We recently introduced our new catalog, which features spray application equipment and accessories, associated finishing supplies, a high quality line of Indasa abrasives, masking tapes, personal protection equipment, non-sparking tools, and more.

Our *First to the Finish* wood product line includes lacquers, conversion varnish, two-component polyurethanes, polyesters, water based finishes, contact adhesives, wood glues, stains, and other related products.

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Environmental Advisory

Impact of Air Quality Regulations on the Furniture Manufacturing Industry

According to Toxic Release Inventory reports filed with the EPA, solvents and VOCs (Volatile Organic Compounds) such as toluene, xylene, MEK and glycol ethers are a significant ingredient in the paint and coatings used by most furniture manufacturers for finishing operations. These chemicals top the list of regulated chemicals released to the environment.

Most New England furniture manufacturers are smaller than those in other parts of the US, use smaller quantities of these chemicals, and are thus not required to file these reports. However, these materials are also regulated by Federal and State air pollution control regulations.

Thus, many smaller manufacturers that use spray booths are not aware that, even those using relatively small quantities of solvents and emitting small amounts of VOCs must still acquire the proper Air Pollution Control Permits.

These regulations can be viewed online.

Massachusetts:

www.state.ma.us/dep/bwp/daqc/files/regs/7a.htm#02.

Maine: www.maine.gov/dep/air/airegs.htm

New Hampshire: http://www.des.state.nh.us/ard_intro.htm

Rhode Island: <http://www.state.ri.us/dem/pubs/regs/regs/air/air15-96.PDF>

Permit requirements vary somewhat from state to state and are multi-tiered according to the amount of VOC emitted. Permits increase in complexity and expense as usage increases.

The most important thing to remember is that once a facility obtains a permit at a certain solvent level, it is required to operate within that limit.

If business increases, requiring increased manufacturing and increased solvent usage, the facility must apply for a new permit at the next level of usage. This can involve increased costs, and even plant shutdown time while the permit process is underway.

(continued page 2)

Air Quality Regulations on the Furniture Manufacturing Industry *(continued from page 1)*

Therefore, it is wise to apply for the highest tier permit that the manufacturer and the regulating authority can agree on. This will avoid costly delays and interrupting plant operations.

In Massachusetts, there is provision in the law for exemptions or Permit by Rule for manufacturers willing to make changes in their processes.

This exemption, called the 310CMR 7.03 Plan Approval Exemption and 7.03 (13) Spray Booth Exemption, applies to furniture manufacturers and metal fabricators. These regulations can be viewed online at www.state.ma.us/dep/bwp/daqc/files/regs/7a.htm#03.

If the facility qualifies, it is allowed to use **670 gallons per month** of paint or coating, or emit **2.5 tons per month** of VOC. This contrasts dramatically with the **5 tons per year** limit on emissions imposed by a Limited Plan Approval in Massachusetts.

This exemption would allow for considerable growth for most manufacturers in New England without the time and expense involved in applying for new, more expensive permits.

This exemption generally requires the use of paint formulations with limited VOC content, and equipment that complies with specified performance parameters, including high efficiency spray guns such as HVLP and/or

electrostatic spray equipment; gun washers; and a spray booth equipped with manometers.

In addition to these specifications, local fire regulations also govern spray booth construction. These regulations are normally based on National Fire Prevention Association standard NFPA 33 “Standard for Spray Application Using Flammable or Combustible Materials” and administered by local fire departments. (These regulations are not accessible to the general public online.)

When considering the purchase of a spray booth, you must ensure that all equipment meets these regulatory requirements. Booths must also be inspected by your local fire department.

The changes may require some upfront expense, but will provide the maximum amount of flexibility in terms of manufacturing volume and solvent usage within the state and federal regulations.

Camger Chemical Systems offers a full range of coatings, formulations, and spray equipment that meet these regulations. Camger service personnel are fully qualified to survey spray painting facilities for compliance with NFPA regulations. They will also offer suggestions to optimize performance.

They have participated in a number of successful

conversions to this technology at facilities in new England. For more info, see your Camger rep.

*-Ken Soltys
Soltys Environmental Group
www.SoltysEnvironmental.com*

Reasonably Available Control Technology (RACT) for Furniture Makers

The air pollution regulations for furniture manufacturing facilities that use sufficiently large volumes of paint to classify them as major sources, must comply with USEPA-mandated regulations that are consistent from state to state. All facilities with paint spray booths that are major sources of VOCs and/or Hazardous Air Pollutants, must have an Air Pollution Control Permit or federally enforceable “restricted emission status” due to volume of paint sprayed and limited hours of operation.

However, facilities that use the volume of paint that places them below the major source category are governed by a set of standards mandated by the individual states with varying requirements.

In Massachusetts, facilities classified as non-major sources are still required to apply for a permit. They also have the additional option of qualifying for an exemption by installing a spray paint booth. (See previous article, page 1).

CEO's message *(continued from page 1)*

In response to numerous requests from our customers about their exposure to federal and state environmental regulations, we are pleased to introduce our new Environmental Advisory newsletter. This issue features valuable information for wood finishers on air quality regulations and RACT (Reasonable Available Control Technology) regulations.

Upcoming issues of Environmental Advisory will include up-to-date information on permits, hazardous waste, and other issues of interest.

Our technical and sales staff is available to answer general questions on regulatory issues, and we have recently begun working with Ken Soltys of the Soltys Environmental Group to address more detailed customer questions.

Ken is an **independent** consultant who brings a wealth of knowledge and experience on both the regulatory and client sides of these issues. He was most recently an environmental consultant with the Massachusetts Office of Technical

Assistance, and has worked as a product development specialist for General Electric, Stauffer Chemical, Midland Dexter, and other manufacturers. We invite our customers to contact him directly for in-depth information on these issues. He can be reached at 781-875-1079, or visit the web site:
www.SoltysEnvironmental.com

We hope you find the information contained in this Environmental Advisory helpful, and will use it to protect your company from costly fees and litigation.

It is our goal to continue to provide our customers with the best products and services, and with the information they need to remain profitable in these tough economic times.

Sincerely,

Dan Iannuzzi
President, Camger Chemical Systems

RACT for Furniture Makers *(continued from page 2)*

Furniture manufacturing facilities in Massachusetts that have qualified for the permit exemption, must use coatings that meet the formulation requirements in the Massachusetts RACT for Wood Surface Coatings[310 CMR 7.18(23). View these regulations online at www.state.ma.us/dep/bwp/daqc/files/regs/7b.htm#18]

Maine, New Hampshire, and Rhode Island all have essentially the same RACT regulations, which are based on Control Technology Guidelines issued by the USEPA although they may be applied differently.

New Hampshire manufacturers that are not major sources must undergo pollution testing and certification in lieu of a permit. Maine also has additional permit requirements for minor sources.

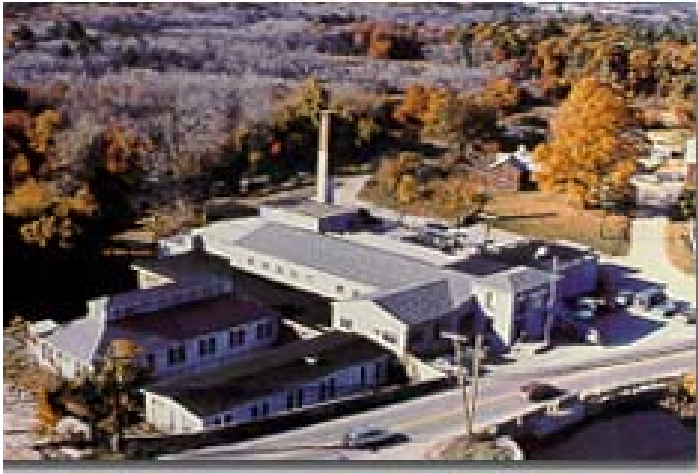
All manufacturers with spray paint operations that use VOC-based paints and coatings must comply

with RACT at a certain threshold level set by individual states. Once the threshold is tripped, the requirements of RACT are set by the USEPA and consequently the same for each state. Therefore, it is important to maintain accurate records of the amount of paint sprayed, including dilution ratios, according to the record keeping section of the Wood Surface Coating RACT.

Camger Chemical manufactures paints and coatings that comply with these federal and state regulations. These formulations have been thoroughly tested and found to perform as well or better than current paint formulations with greater concentrations of VOC. Most also yield more coverage, making them more cost effective than older formulations with higher VOCs. For more info, see your Camger rep.

-Ken Soltys
Soltys Environmental Group
www.SoltysEnvironmental.com

Coatings Care: Health, Safety, and Environmental Responsibility



Camger's 80,000 square foot state-of-the-art facility, located in Norfolk, Massachusetts.

Camger Chemical Systems is proud to participate in Coatings Care, a performance-based initiative designed to assist industry companies manage their health, safety and environmental responsibilities.

Coatings Care, sponsored in the U.S. by the National Paint & Coatings Association, is now being implemented in 20 countries around the world. The program teaches companies how to effectively protect worker and community health, safety, and the environment, while implementing sound business strategies that will provide for expansion and market growth.

Environmental Responsibility

Participants ensure the safe selection, handling, use and disposal of chemical components in paint product, and emphasize environmental protection in new product development.

Its four codes of management address issues of manufacturing, transportation and distribution, product stewardship, and community responsibility.

We at Camger are proud of our safety and environmental policies. We invite you to tour our 80,000 square foot state-of-the-art facility in Norfolk, MA, where you will see how our management practices address appropriate health, safety, and environmental concerns, while maintaining the highest levels of quality and efficiency.

Many of our products have been specifically developed to meet specific customer needs. We know that your success is our success. We welcome your suggestions on how we can work together to solve your coatings problems.



364 Main Street
Norfolk, MA 02056
tel: 508-528-5787
fax: 508-520-1430
www.Camger.com