



Environmental Advisory

CAMGER
COATINGS SYSTEMS, INC.

www.Camger.com

Message from the CEO



*Dan
Iannuzzi*

Since 1971, Camger Coatings 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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Recycling Solvents: Benefits to Manufacturers

US Environmental Protection Agency regulations allow for the recycling of certain materials, including organic solvents.

Recycling allows manufacturers reduce VOC emissions and gain a margin of safety in complying with existing Air Pollution Control Permits.

Recycling also helps reduce raw material costs, and reduce hazardous waste generated.

All six New England states comply with federal regulations requiring that records be maintained on the amount of material being recycled, including dates, where the material originated and where and how it was reused.

In addition to complying with federal regulations, New Hampshire, Vermont and Rhode Island do not require state permits for recycling; Massachusetts and Maine do.

In Massachusetts, recycled materials must be classified as Class A, B or C.

Organic solvents are generally classified as "Class A Recyclable Materials."

Massachusetts manufacturers who recycle Class A materials must:

- submit a one-time notification to the DEP prior to or upon commencing a Class A recycling operation
- obtain a generator ID number from the DEP
- manage regulated materials that are not recycled as hazardous wastes which must be accumulated, collected, transported, stored, treated, and disposed of in compliance with the hazardous waste regulations.
- Very Small Quantity Generators who ship Class A materials off-site for recycling may not accumulate 1000 kilograms or more of regulated recyclable materials on site at any one time.

Ask your Camger representative for more information about how you can recycle your solvent using a still. Camger offers many types and sizes of small distillation systems to choose from.

Rhode Island Manufacturers Face Tough Environmental Regs

The US Environmental Protection Agency estimates that significant amounts of solvent are released into the atmosphere from small uncontrolled sources such as manufacturing facilities that perform painting and coating operations.

Solvents and VOCs (volatile organic compounds) such as toluene, xylene, MEK and glycol ethers are significant ingredients in the paint and coatings used by many manufacturers for finishing operations.

Many Rhode Island manufacturers also use organic solvents in their manufacturing operations for parts cleaning or paint stripping.

In many instances, the quantities involved are so small that factory managers are not aware that they are subject to environmental regulations.

One group of regulations that normally falls “under the radar” for small Rhode Island manufacturers are the state Air Pollution Control (APC) regulations.

Rhode Island Air Resources Regulation 9.3.1 (f), states that “any stationary source (facility using solvents) which has the potential to increase emissions of a listed toxic air contaminant by greater than the minimum quantity for that contaminant, as specified in Appendix A” is required to obtain an Air Permit.

A review of Appendix A reveals that emission rate thresholds for toluene and xylene are 1.2 lbs/hour and methylene chloride at 0.1 lbs/hour.

This regulation does not restrict usage to the quantities specified, but requires that users have a permit to use these chemicals.

Since this state requirement is more stringent than federal pollution control regulations, many smaller local businesses are not aware that they may be noncompliant.

Manufacturers that use small quantities of solvents should make a careful review of the solvents they use, calculate amounts used, and determine permits required.

Rhode Island Rules & Regulations for Hazardous Waste Management are also more stringent than US EPA standards for accumulation of hazardous waste.

The state requires that “a generator of Hazardous Waste may accumulate hazardous waste on-site for 90 days” regardless of the amount stored or a company’s hazardous waste generator status.

The containers must be stored in an area designated for the collection of hazardous wastes and marked with proper signage and yellow tape or lines on the floor.

Each container must be labeled with the nature of the contents e.g. “WASTE SOLVENT” and dated when the container was placed there.

Accurate tracking of waste solvent is critical in calculating VOC emissions for determining permit status, however, a generator is allowed to accumulate up to 55 gallons of hazardous waste (or 1 quart of acutely hazardous waste) with no storage time limit in an area adjacent to the manufacturing process generating the waste.

The container must be identified as a SATELLITE STORAGE container for hazardous waste.

Once the container is full it must be labeled, dated and moved to an area labeled the HAZARDOUS WASTE ACCUMULATION AREA and scheduled for pick up by a licensed Hazardous Waste Transporter within 90 days.

If you have recently been visited by a state environmental regulating authority, or need more information on federal or state environmental regulations, call Ken Soltys at Soltys Environmental for an initial consultation to determine your environmental regulatory exposure.

-Ken Soltys

Soltys Environmental Group
www.SoltysEnvironmental.com

781-875-1079

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 the information they need to remain profitable in these tough economic times.

Sincerely,

Dan Iannuzzi
President, Camger Coatings Systems

OSHA Issues Final Rule on Respiratory Protection

The Occupational Safety and Health Administration has announced an addition to the approved fit-testing protocol in its Respiration Protection Standard. The revision adds a new quantitative fit-testing procedure to assist workers and employers in the proper fit and selection of respirators.

The new fit-testing protocol, referred to as the Controlled Negative Pressure (CNP) REDON protocol, requires three different test exercises followed by two redonnings of the respirator.

The three test exercises are normal breathing, bending over, and head shaking, and include holding the breath, removing, then redonning the respirator.

“Selecting the proper respirator is a vital step in protecting a user against potential overexposure and adverse health effect,” said OSHA Administrator John Henshaw. “The additional fit-testing protocol will help employers and employees to select the right respirator based on conditions in their workplaces.”

Camger carries a full line of respirators designed to protect workers and comply with OSHA regulations. Dan Iannuzzi, Camger president, said, “Camger is committed to providing products to our customers that help them ensure the safety of their worker and comply with the latest regulations.”

For more detailed information on respiratory protection protocols, see your Camger rep.

Coatings Care: Health, Safety, and Environmental Responsibility



Camger Coatings 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.

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.



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