



Issue Summary:

PFAS and the Surface Finishing Industry

Spring 2019

The National Association for Surface Finishing (NASF) represents the interests of businesses, technologists and professionals in the surface coatings industry. NASF and its member companies have a long history of environmental stewardship. We are the only industry in the U.S. to have requested a ban from the U.S. Environmental Protection Agency on the use of PFOS nearly ten years ago.

Due to the association's efforts, the EPA banned the use of PFOS from use in the industry in 2012. NASF and its members have continued to work proactively with the US EPA, the Michigan Department of Environmental Quality (MDEQ), and other stakeholders in Michigan, at the national level and globally to find effective solutions to reduce and eliminate perfluorooctane sulfonate (PFOS) in wastewater discharges.

A History of Proactive Environmental Stewardship around PFOS

- Beginning in 1995, the U.S. Environmental Protection Agency recommended the use of PFOS as a fume suppressant in the chromium electroplating process.
- The amounts of PFOS used represented a tiny fraction of all commercial uses. It's estimated that the use of PFOS in the surface finishing industry represented less than one half of one percent of U.S. and global PFOS use.
- It's estimated that thirty to forty percent of surface finishing facilities have chromium electroplating processes.
- The surface finishing industry over ten years ago began working with EPA and Minnesota to eliminate the use of PFOS as a fume suppressant based on early findings of PFOS in wastewater from chromium plating operations.
- NASF proactively approached EPA and began a process that led to the industry itself requesting a national, industry-wide ban from EPA on the use of PFOS in chromium plating operations, which was finalized under a new federal Clean Air Act rule in 2012.
- The surface finishing industry is the only industry to have proactively requested and received a ban on PFOS use in a USEPA regulation. The ban came into full effect in 2015.
- The industry took steps during that time to adopt safer, EPA--approved, commercially available alternatives for fume suppression. The industry has since been working to explore and utilize both EPA--approved fluorinated and non--fluorinated based alternatives as fume suppressants.

So Why Is PFOS turning up in Wastewater Discharge from some surface finishing operations?

- Industry and regulatory agencies are uncertain why PFOS has been found to be present at trace levels in wastewater from some facilities.
- As the issue has come to light, NASF has engaged with USEPA, Michigan DEQ, the wastewater treatment plant community, industry partners, and other stakeholders in the U.S., Europe and Asia in an effort to gain a more thorough understanding of: (1) why trace amounts of PFOS may still be present and where it's coming from, and (2) the most effective solution for minimizing and eliminating residual concentrations.
- More sensitive testing has revealed trace amounts of PFOS in wastewater effluent discharges from some Michigan surface finishing facilities, even though the surface finishing industry no longer uses PFOS.
- As analytical testing technology has become far more sensitive, PFOS detection values have been lowered from parts per billion to parts per trillion. Tests today can measure close to 1 ppt, the equivalent of a single drop in about 20 Olympic--sized swimming pools.

NASF has continued to engage stakeholders in Michigan, across the U.S. and worldwide to better understand and take appropriate steps to address the issue.

- NASF has been working to develop and launch a national research project to understand why PFOS may be present in the wastewater effluent of plants that haven't used PFOS in years or, in some cases, ever.
- As we have in the past, we are working to bring together federal and state agencies and other stakeholders across the region, including US EPA, EPA Region 5, Michigan DEQ, and wastewater treatment plants, to research this unexpected finding and to effectively address the issue.

For more information, please visit nasf.org/pfas

All questions regarding the NASF and the surface plating industry's environmental stewardship efforts to address PFOS in wastewater discharges should be directed to Christian Richter at crichter@thepolicygroup.com or Jeff Hannapel at jhannapel@thepolicygroup.com.