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PRINT & GRAPHIC COMMUNICATIONS ASSOCIATION (PGCA) PREVAILS ON NEW YORK STATE BAN ON BLACK PRINTING INK CONTAINING CARBON BLACK

We are pleased to report that the New York State Legislature has adjourned without passing the Extended Producer Responsibility (EPR) legislation containing the proposed ban on carbon black, the primary pigment in black printing ink. Thanks to all who were involved in this monumental effort! We had many companies, members, and non-members alike, write letters, take meetings, and make personal calls to their NYS legislative representatives, expressing their concerns about this critical issue!

In achieving this victory, PGCA worked with an extensive coalition of organizations who are broadly opposed to the overarching EPR bill. However, the Print & Graphic Communications Association was one of only a few associations, along with the Color Pigment Manufacturers Association (CPMA) and the National Association of Printing Ink Manufacturers (NAPIM), and others, whose primary focus was on fighting against the proposed Carbon Black ban.

Without our focus on this critical issue, it is doubtful if the proposed ban, which would have essentially destroyed the packaging and label business in New York State, would have been removed from the overall bill!

To recap, several months ago, we advised the New York State industry, members and non-members alike, that the EPR bill, titled the Packaging Reduction and Recycling Infrastructure Act (PRRIA), contained a section that would ban the use of several chemicals that were being designated as “toxic” including carbon black.

Recognizing the existential challenge to our industry that a ban on black printing ink would be, PGCA jumped into action and took the following actions over the next several weeks.

- ✓ **Prepared and sent an immediate message**, protesting the proposed carbon black ban, to all New York State legislators and Governor Kathy Hochul through the PGCA Legislative Action Center.
- ✓ **Prepared and sent an Action Alert** to our industry contacts, member and non-member, advising them of the issue and asking them to communicate their concerns to their legislators, again through the PGCA Legislative Action Center. This alert, along with several follow-ups, generated over 500 individual participant grassroots communications to legislators.
- ✓ **Hired an experienced, effective, and knowledgeable Albany lobbyist**, Thomas Faist, Esq., from Faist Government Affairs Group to represent our industry's interests.



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COVER CONTINUED

- ✓ Through Mr. Faist's efforts **we met with a number of individual legislators and/or staff** including the following New York State legislative leaders:
 - **Bonnie Lockwood**, Regional Director of Western New York for NYS Governor Kathy Hochul
 - **Crystal Peoples-Stokes**, NYS Assembly Majority Leader
 - **Charles LeDuc**, Legislative Director for NYS Assemblywoman Deborah Glick (Assembly sponsor of the PRRIA)
 - **Marie Kelly**, Legislative Director for NYS Senator Pete Harkham (Senate sponsor of the PRRIA)
- ✓ **Commissioned an article on the topic**, written by Patrick Henry, that was used to educate legislators and industry representatives.
- ✓ **Conducted an extensive social media campaign** on the issue directed at the industry, graphic designers, and brand owners.
- ✓ **Authored a joint letter opposing the legislation** with one of the state's largest printing unions, the Printing Packaging & Production Workers Union of North America. Distributed letter to Senate and Assembly Labor committees as well as entire Legislature.

- ✓ **Encouraged members to invite legislators to their facilities** and supplied industry collateral material on the issue for their use.
- ✓ **Submitted a Memorandum-in-Opposition** to every member of the New York State legislature.

While the NYS legislature has adjourned without approving the bill, you can be certain the issue is not done. The EPR bill, without the carbon black ban, has passed the NYS Senate. The NYS Assembly adjourned without voting on the companion bill. The EPR bill, which will drive significant business out of New York State, will resurface before the end of 2024. While we don't believe a carbon black ban will be added back in, the environmental lobby may press for its inclusion into an amended bill and the fight will be on again. Stay tuned!

We are pleased to have taken a leadership role in this successful effort and are working diligently to address a similar situation in New Jersey as well as monitoring the situations in Pennsylvania and Delaware.



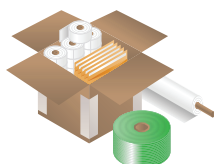
New Jersey printers can visit PGCA's Legislative Action Center at votervoice.net/PGCA/campaigns/ to urge New Jersey legislators to oppose the ban on carbon black. Please do not hesitate to contact Tim Freeman at tim@printcommunications.org or (716) 691-3211 with your questions or concerns and once again, thank you for your efforts on this important issue!

Count on US

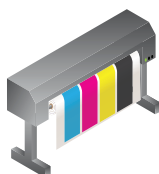
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DRUPA 2024**KEY TAKEAWAYS FROM DRUPA 2024**

By Keypoint Intelligence

drupa 2024 came to an end on Friday, June 7, and we bid “Verabschiedung” till 2028. Following the 2020 onsite gathering cancellation due to COVID, this highly anticipated event did not disappoint—buzzing with excitement and strategic announcements not only in technology but groundbreaking partnerships, too.

German Sacristan, Principal Analyst of On Demand Printing & Publishing

Strong alliances were a highlight of this year’s drupa. Heidelberg announced its collaboration with Canon to sell inkjet cut-sheet printers (i.e., varioPRINT iX3200 and the newly unveiled varioPRESS iV7 B2 press). Similarly, HP partnered with Canva, Landa with Gelato, and Ricoh with Scodix (revealed before drupa). These collaborations are crucial for growth. For instance, Heidelberg can leverage its offset market presence to help Canon reach customers that might not have previously considered Canon’s inkjet printers. Likewise, HP and Landa can tap into the expansive communities of print enablers and drivers like Canva and Gelato.



Heidelberg’s stand featuring the Canon varioPRINT iX3200 heralds a new partnership.

Acquisitions made even before drupa also played a significant role. Kyocera’s purchase of NIXKA in April 2023 allows it to expand into industrial and photo applications, demonstrating the effectiveness of acquisitions in fueling growth and innovation.

Technological Advancements

One of the most significant announcements was for Canon’s varioPRESS iV7 B2 press. It stands out not only for its speed—8,700 B2 full-color impressions per hour—but also for its modularity. The press feeds long edge first at 29.5”, indicating a potential future upgrade to a B1 press. The print module tower design also suggests the possibility of additional colors beyond CMYK, offering remarkable flexibility and scalability.

Innovative Approaches

Fujifilm introduced an interesting approach with its new Jet Press 1160CF. Starting with a tower/module that removes moisture from the paper before printing, the company addresses several key challenges: ensuring consistent print color quality between duplexing engines, maintaining speed in high-quality modes and on heavier media, as well as reducing wrinkling around solids when printed with text.

Focus on Software AI and Sustainability

Ricoh aggressively promoted the Pro Z75 and Pro VC80000, both utilizing the same printheads and inks. Under the banner “See the Potential in the Future of Print”, Konica Minolta demonstrated its new AccurioJet 60000. There was also focus on a software offering that provides print output quality guidance and recommendations based on demographic consumer profiles, such as country, gender, and age.

Komori showcased its new J-Throne 29 B2 digital press and emphasized how AI enhances the productivity and uptime of its offset presses by making automatic adjustments on the fly based on job-to-job experience. The company also highlighted sustainability by transparently displaying the electrical consumption of its offset presses per job on the control panels.

It was also encouraging to hear from HP about how the company assists its PSP customers with their sustainability efforts by enabling the creation and tracking of factory environmental assessments.

Jean Lloyd, Principal Analyst of Labels & Packaging

drupa 2024 was a showcase of cutting-edge technology and visionary approaches in the print and packaging industry. The event featured an array of leading companies that brought unique solutions and insights to the forefront.

Bobst: A Visionary Approach

Bobst left a lasting impression with its unique approach at the press event. Opting for a booth without any equipment, the company showcased a retrofit model to convey its industry vision of shaping the future of packaging while emphasizing its commitment to sustainability. The entire stand was focused on solutions to alleviate industry pain points, promoting seamless end-to-end workflows, and reinforcing a message of practicing what it preaches in sustainability.

Canon

Canon's "Power to Move" theme stood out as the most compelling example of effective storytelling among the large exhibitors. This theme encapsulated Canon's vision for the future of the print industry, reflecting its commitment to empowering print service providers to adapt, grow, and succeed in a dynamic, ever-evolving market. Canon's new Label press, the LabelStream LS2000, attracted significant interest from attendees.

EFI

EFI's booth featured its popular Nazomi 14000 AQ press and aqueous inks, focusing on the theme of no compromise with digital solutions. Additionally, the new Packsize EFI X5 Nazomi, designed for the booming e-commerce application market, was a hot topic at the show. This system is fed by a fan fold and cuts, decorates, and delivers an erected box in 6-7 seconds—providing the right sized packaging for efficient delivery.

Fujifilm

Fujifilm's stand attracted significant attention, especially for its Jet Press FP790 Flexible Packaging press. The stand was extremely busy most days, with Fujifilm securing five deals within the first few days of the event. Additionally, Fujifilm Business Innovation and Konica Minolta announced plans for a strategic alliance involving production printing devices, multifunction printers, and office printers, with Fujifilm leading the charge.

HP

HP dedicated an entire hall to showcasing its solutions. The booth featured separate areas for commercial print, publishing, labels, flexible packaging, folding cartons, and corrugated packaging. Each station displayed vibrant printed samples, demonstrating the capabilities and possibilities of HP's technologies in a visually impressive manner.

On the commercial side, the Indigo 120K and 18K digital presses showed productivity improvements from previous versions, such as jamming reduction and auto recovery and alert that reduces operator intervention, which combine to increase uptime to be able to compete with inkjet.

Koenig & Bauer/Durst

The Koenig & Bauer/Durst stand impressed many with its modern design and well-displayed digital solutions. Digital integration was clearly a key focus, with the company highlighting growth areas in post-press, digital printing, corrugated printing, and flexible packaging. Durst's collaboration with Omer introduced an ultimate hybrid concept that unites analogue and digital technologies, revolutionizing the labels and flexible packaging markets.

Landa

Landa's opening press event was a standout moment, with Benny Landa captivating the audience with an overview of Nanography technology. Landa's partnership with Gelato and ESP Colour promises to redefine the print and packaging landscape—enhancing efficiency, quality, and profitability for print customers through advanced technology and software. The new Landa cut-sheet presses run at a very similar speed (11,200 B1 full color impressions per hour) to offset presses, bringing great productivity to digital inkjet.

Screen

Screen's booth featured the Truepress PAC 830F, a flexible paper packaging press that garnered much interest. The focus on labels and flexible packaging solutions highlighted Screen's dedication to innovation in the industry. On the commercial side, Screen showcased the new Truepress JET 560HDX, which does not require pretreated papers or primers.

Keypoint Intelligence Opinion

These highlights from drupa 2024 showcase the diverse and innovative approaches taken by leading companies in the commercial print as well as labels and packaging industries. Each exhibitor brought solutions and visions to the table, contributing to an exciting and forward-looking trade show experience. As expected, all solutions from vendors linked to the print buyers' purchasing criteria of quality, productivity, cost, and sustainability.

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PGCA Co-Presidents
Tim Freeman
and Melissa Jones
connected with
Deborah Corn
at drupa.

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Go to portal.printindustries.org/ to get started. Time to complete – 5 to 10 minutes for returning survey participants, 15 to 20 minutes for new participants. PGCA members who submit their data will receive a FREE copy of the results. Survey results are available to non-participants for \$250 (PGCA members) and \$750 (non-members). Contact Kim Tuzzo at (716) 691-3211 or kim@printcommunications.org with questions.

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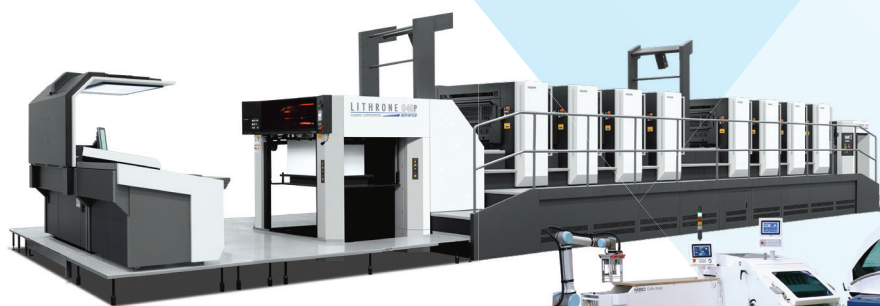
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UNION INVOLVEMENT IN OSHA INSPECTIONS

TIME TO PREPARE FOR OSHA'S NEW
"WALKAROUND RULE"

By Nicholas J. Fiorenza, Esq., Ferrara Fiorenza PC and PGCA Association Counsel

In a development consistent with President Biden's growing reputation as leading the most pro-union administration in history, the Occupational Safety and Health Administration (OSHA) has published a rule allowing employees to select non-employee third parties to be present for – and to participate in – OSHA inspections, commonly referred to as "walkarounds". The revised Final Rule, which went into effect May 31, 2024, modifies OSHA's current practice of only allowing employee representatives to be present during inspections. In announcing its new approach, OSHA expressed its view that the new rule will "better align OSHA's regulation with the OSH Act and enable the agency to conduct more effective inspections."

Since opening the door to non-employee representatives is intended to capitalize on outside "knowledge or experience with hazards or conditions in the workplace or similar workplaces", it is widely expected that union representatives (and organizers)

will take advantage of the new rule to gain access to non-union workplaces. And while already unionized workplaces can expect non-employee union officials to be present at their safety inspections, they should also take note that the door is now open to other third-party participants as well.



While employees and employers may file objections to any selected representative, there are no clear standards governing how such protests should be decided. OSHA inspectors have wide discretion to resolve these issues. The rule includes some restrictions on the conduct of "inspection representatives", including safeguards against disruptions to operations, taking photographs, engaging with employees as to issues unrelated to the inspection and others. But, again, controversies involving these issues will be resolved by the inspector.

Although court challenges are expected, if implemented, employers will not only now face the daunting task of complying with OSHA regulations and preparing for potential inspections, they will also have to prepare for a union's (or other third party's) involvement in OSHA inspections as well as these third party's access to the employer's workplace and employees in general.



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CONTINGENCY PLAN

BUILDING A BETTER “BACK-UP” PERSON

By Howie Fenton

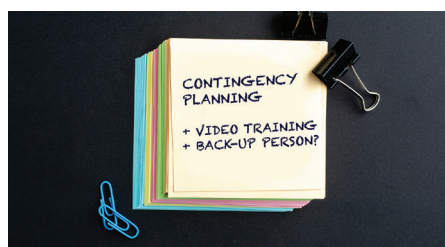
During a recent assignment, I had the opportunity to work with a company that was facing significant challenges in its production process. The magnitude of their struggle became evident when the production manager took a well-deserved vacation, leaving the staff to tackle a seemingly routine task. To their dismay, they found themselves unable to perform the task without the manager’s guidance.

The incident shed light on the risks associated with relying solely on individual expertise or specific personnel within an organization. While it is undoubtedly valuable to have skilled and experienced individuals leading various functions, it is equally important to have contingency plans in place. This ensures that operations can continue smoothly even when key team members are absent or unavailable.

The situation presented an opportunity for the company to reevaluate its approach to contingency planning. By acknowledging the limitations of a dependency on a single individual, they could recognize the need for a more sustainable and resilient system. Creating redundancy and cultivating back-up personnel not only mitigates risks but also enhances overall operational efficiency.

Building a better back-up person involves several crucial steps. First, it requires identifying critical roles and tasks within the organization that could potentially be disrupted by the absence of key personnel. These could include specialized knowledge, technical skills, or decision-making authority. Once these roles are identified, the company can proactively work towards cross-training and skill development programs. This enables employees to acquire the necessary expertise and confidence to assume additional responsibilities when needed.

The next step involves taking advantage of the benefits of video training. Video training is becoming part of our culture. As more people discover YouTube videos on how to fix our garage door or build a new deck, the value of video training is undeniable. In addition, with today’s smart phones, it doesn’t cost much to make a video – and it’s easy to do. If you need a video about how to set up a machine or create a job ticket, simply ask your best operator how they do it. All you have to do is ask them to describe and show the process, why they are performing each step, and how they’re doing it. And after practicing for a few minutes, you can create a video with important content.



Once the videos are completed, they can be edited and saved in a folder accessible by anyone in the company. When the back-up person has to perform a task that they may not remember because they were trained on it six months ago, all they have to do is access the file, and they will see exactly how to perform that task.

In conclusion, the incident I witnessed during my recent assignment highlighted the importance of building a better back-up person within an organization. Relying solely on individual expertise or memory of past training poses significant risks, as demonstrated by the production struggles faced by the company when their manager was absent. By proactively identifying critical roles, implementing training programs, sharing knowledge, and fostering a collaborative culture, companies can build resilience and ensure smooth operations, even in the absence of key personnel.



From Mailers Hub News Issue #202 and used with permission from Howie Fenton. With over 30 years of experience, Howie has established himself as a leading advisor, author, and trainer in the graphic arts industry. His subject matter expertise lies in benchmarking operational and financial performance, which is underpinned by both practical and extensive market research. Visit howiefentonconsulting.com or email howiemfenton@gmail.com.

GUIDE TO EPA WIPES RULE

NAVIGATING THE EPA WIPES RULE: PREPARE YOUR PRINT FACILITY FOR COMPLIANCE AND INSPECTION

By ITU AborbTech, PGCA's Endorsed Printer Towel Provider

The EPA Solvent-Contaminated Wipes Rule (EPA Wipes Rule) helps ensure print facilities responsibly store, manage, and transport their solvent-contaminated wipes. As regular inspections become more prevalent, it's important to know what to expect and to be well-prepared for when an inspector shows up at your doorstep.

This article is your comprehensive guide to preparing for an EPA Wipes Rule inspection. We'll give an overview of the rule, provide guidance for getting your facility ready, and share example questions to help you anticipate and address potential concerns before an inspector arrives.

What is the EPA Wipes Rule?

Print facilities, with their heavy usage of solvents for cleaning and maintenance, are most affected by the EPA Wipes Rule. The rule, as implemented, prevents solvent-related hazards such as air pollution, groundwater contamination, harm to wildlife, and a host of health concerns to the human body that could arise from the mishandling of solvent-contaminated wipes.

EPA Wipes Rule compliance helps ensure solvent-contaminated wipes are properly stored, drums and containers are labeled correctly, and wipes are disposed of in accordance with exclusions from hazardous waste regulations or properly laundered if they're reusable.

Penalties for Noncompliance

The Resource Conservation and Recovery Act (RCRA) imposes fines of up to \$70,117 per day per violation concerning the management of hazardous waste. This includes the improper handling, storage, treatment, or disposal of hazardous materials.

Under the Clean Air Act (CAA), violations such as exceeding emission limits, failing to install necessary control technology, or not adhering to permit requirements can result in fines of up to \$93,750 per incident.

Meanwhile, the Clean Water Act (CWA) targets water pollution and can levy fines of up to \$53,907 for each violation, such as discharging pollutants without a permit or exceeding discharge limits.

Although these maximum fines are generally reserved for the most willful or severe breaches of the regulations, it's important to understand the significant financial risks.

What to Expect During an EPA or State Inspection

Inspections typically include an information-gathering stage to understand your operations. Once on-site, the inspection will typically involve the following

- **Interviews with facility representatives**
- **A review of relevant records and reports**
- **A physical assessment of the facility might include taking photographs, collecting samples for testing, and observing day-to-day practices.**



For an inspection focused on the EPA Wipes Rule, the key focus areas include storage methods, solvent recovery processes, and the overall management of contaminated wipes. Ensuring these areas meet or exceed regulatory standards is crucial to avoiding fines.

How to Prepare Your Print Facility for an EPA Inspection

Preparing your print facility for an EPA inspection can reduce the stress and potential issues that might arise during the process. Here's how to ensure you are prepared:

Pre-Inspection

Establish a Process: Develop and implement written processes for the storage, labeling, preventing and eliminating free liquid, and disposal of wipes to ensure consistency across your operations.

Here is a sample written process: Wipers are hand-wrung after use to eliminate free liquid. The user places the soiled towel into a labeled storage container located at the machine. The containers are combined into a labeled transportation container. When they are combined, the containers are visually inspected for evidence of free liquid. If any liquid is found, it is removed and properly handled prior to transportation to a disposal facility or laundry.

Develop a Plan: A comprehensive compliance plan, regularly reviewed and updated, can guide your facility's efforts, make sure everyone is on the same page, and demonstrate a proactive approach to environmental stewardship.

Documents

Organize all critical documents that the inspectors might review. This includes:

Facility Operations: Provide a detailed description of your facility's primary operations, including Standard Industrial Classification (SIC) and North American Industry Classification System (NAICS) codes. This will be helpful if the inspector needs this information pre-inspection or when they arrive on-site.

Environmental Permits and Licenses: Keep copies of all environmental permits and licenses required for your operations. This not only shows compliance but also helps with quick referencing during the inspection.

Process Documentation: Document each process or potential pollution source in your facility. Include information about the installation dates and any modifications made.

Chemical and Material Inventories: Maintain an updated list of all chemicals and raw materials used in your facility, highlighting how these materials are stored, handled, and disposed. Have a current SDS on hand for all chemicals.

Pollution Control and Waste Minimization: Provide details on pollution control devices and waste minimization practices you have in place. This could include anything from scrubbers and filters to recycling and reuse programs.

Maps and Layouts: Include a map of your facility that marks significant areas that might be of importance to an inspector such as process units, storage areas, and waste handling sites.

Compliance History: Keep a record of all previous interactions with environmental authorities, including past inspections and any enforcement actions.

Employee Training Records: Show that your employees are well-trained in environmental management as well as health and safety procedures. These records should showcase initial training for new employees and any ongoing or refresher courses.

Training should cover all aspects of the EPA Wipes Rule, including the proper handling and disposal of solvent-contaminated wipes and adherence to facility-specific procedures. For instance, employees should be taught to always ensure containers are securely closed, and labeled, follow proper processes to prevent free liquid and avoid disposing of these materials in regular trash bins.

Such detailed training minimizes the risk of non-compliance and reinforces best practices in workplace safety and environmental responsibility.

Accident History: Maintain an account of any environmental incidents or accidents, including spills, with details on how they were handled, and any corrective or preventative actions taken, such as a spill response procedure.

Internal Audit

Conducting an Internal Audit: Conduct regular audits of wipes usage, disposal practices, and compliance protocols to identify any potential issues. If you come across any areas of noncompliance that are too late to update before the inspection, be prepared to acknowledge them.

The inspector may also uncover other problem areas. In this case, you should be able to explain the corrective measures you are taking to come into compliance.

Each time you have an inspection, you should revise your established plans, make notes, update your processes, and discuss continuous improvement or 6S projects.

Questions You Should Be Prepared to Answer

ITU AbsorbTech's in-house Environmental Engineer, Jodi Drew, has provided some questions that may be asked during an inspection to help you prepare.

Q: How do you mitigate free-standing liquids?

According to the EPA, solvent-contaminated wipes and their containers must contain no free liquids at the point of transport for cleaning or disposal. This rule prevents the creation of additional laundry waste and allows printers to use the exclusion.

It's essential to know what processes you have in place so that free liquids do not accumulate in your containers. Some examples of mitigating free-standing liquids include wringing out absorbents, using a drip pan to collect solvent, using precise measurements and pouring using a funnel to reduce splashing and spraying, removing excess ink from surfaces with a scraper before wiping, and placing basins around screens to capture chemical overspray.

You are required to keep a few written sentences explaining specific methods used at your facility for handling solvent-contaminated wipes. This should include material handling steps with details on how and where the extracted liquids are stored, treated, or disposed of.

By having this information written down and ready for an inspector, you're demonstrating that your facility effectively manages and minimizes free-standing liquids. It helps eliminate one of the common concerns regarding improper waste handling.

Q: What is your laundry process?

An inspector might ask about your laundry or disposal process to ensure that it complies with regulatory standards. They want to make certain there's a system in place for handling solvent-contaminated wipes correctly from start to finish.

Partner with a reputable towel cleaning service company to clean your towels and recover the solvent. Ensure they process towels in-house and meet the requirements in the EPA Wipes Rule.

For example, at ITU AbsorbTech, our processing facilities are registered to ISO 14001:2015 by Intertek. We are a permitted



PGCA'S SOCIAL MEDIA GURU

MEET TINA ANDERSON, PGCA'S SOCIAL MEDIA GURU!

Tina Anderson, Owner of Creative Juices Marketing + Events, has been creating our social media since we joined PIA and GAA together to form the Print & Graphic Communications Association. Tina has tripled our growth and engagement on LinkedIn and has grown our communities on Instagram and Facebook in leaps and bounds. We thought it was time for members to meet Tina, as an essential member of the PGCA staff.



Tina Anderson is a marketing professional with over 10 years of experience in social media, content creation, and community management. In March 2022 she launched Creative Juices Marketing + Events full time and has enjoyed the entrepreneurship experience. In addition to Creative Juices, she also owns SheConnects, a resource center for female professionals, and the Buffalo Kid Entrepreneurs, an organization that provides free vending and financial education to youth entrepreneurs.

In her spare time Tina has a passion for film, live music, stand-up comedy and traveling. She works with local theatres on live film events, and even co-ran a Drive Inn Theatre during the pandemic. Tina loves to connect with other businesses and organizations, so feel free to say "hi" in person, at events, or online at creativejuicesny.com!

Are you sharing and interacting with the wealth of social media materials regularly distributed by Print & Graphic Communications Association? Recent posts featured urgent information on Carbon Black legislation in NY and NJ, Print University, new member announcements and event announcements and recaps.

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Continued from page 11

solvent recovery facility under the Clean Water Act. We ensure proper wastewater treatment with advanced pretreatment, then discharge it to a local Publicly Owned Treatment Works (POTW). Any non-hazardous sludge generated during our processes is disposed of in a local landfill. We maintain comprehensive documentation on all our permits, including issuance dates, issuing agencies, and expiration dates. This documentation is readily available for our customers upon request.

Q: What is the frequency of your laundry service?

According to the EPA Wipes Rule, 180 days is the maximum amount of time allowed to accumulate soiled absorbents before they must be cleaned or disposed of. Tracking your laundering or disposal schedule and adhering to this timeline shows the inspector that processes are in place and are being followed regularly.

For ITU AbsorbTech customers, our Service Reports are adequate to show scheduled pickup dates.

Q: Is everything labeled?

The EPA Wipes Rule requires that all containers used for in-house storage (like red flip-top cans) and those used for external transport be labeled as "Excluded Solvent-Contaminated Wipes."

At ITU AbsorbTech, our service representatives carry a supply of these labels in their vehicles, allowing them to immediately address any missing labels and guarantee all containers comply with labeling requirements.

Q: Are your containers ready to be moved?

All transportation containers must be able to be closed/sealed and leakproof for transportation away from the site.

Conclusion

Print facilities can go beyond simply preparing for an inspection. By integrating the strategies discussed, such as internal audits, employee training, and process controls, you can foster a culture of going above and beyond compliance and ensuring environmental responsibility.

You should also update your compliance plan regularly. Remember, preparation is key. By taking these steps now, your facility can confidently showcase its dedication to safety and sustainability during your next inspection.

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ANDY BIERNAT RECOGNIZED FOR LEGISLATIVE ACHIEVEMENT

Congratulations to Andy Biernat, VP Strategic Risk Advisor, with Gilroy Kernan & Gilroy, for receiving the Daniel E. Colacino Legislative Achievement Award from the National Association of Benefits and Insurance Professionals (NABIP), NY chapter.

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The Daniel E. Colacino Legislative Achievement Award recognizes NABIP members who have performed special service in state legislative affairs during a single association year or over an extended period of time. This honor is presented to members making significant contributions and performing outstanding service in connection with state legislative matters by developing and implementing methods to strengthen and improve NABIP-NYS's stance in the industry.



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HAZARD COMMUNICATION STANDARD UPDATE

HAZARD COMMUNICATION STANDARD UPDATED

Three years after it was proposed, The Department of Labor (OSHA) has announced the final rule to the current Hazard Communication Standard. The new 29 CFR 1910.1200 standard has been updated to align it with the seventh revision of the Globally Harmonized System of Classification and Labeling released by the United Nations committee of Experts in 2017. The rule also includes several letters of interpretation OSHA issued since the standard was last updated in 2012 and is primarily focused on chemical manufacturers, distributors, and suppliers. The changes will enhance the standard to better protect workers by improving the amount and quality of information on labels and safety data sheets and allow workers and first responders to react more quickly in an emergency. The updates take effect on July 19, 2024.

The updated standard included new definitions for bulk shipment, released for shipment, immediate outer packaging, combustible dust, gas, liquid, solid, and physician or other licensed health care professional. Exposure and/or exposed, physical hazard and hazardous chemical have been revised. Some of the changes will require labels on small packaging to be more comprehensive and readable. Other changes help ensure trade secrets no longer prevent workers and first responders from receiving critical hazard information on safety data sheets.

Workers will also benefit from other changes in the updated standard, including a clearer hazard classification process to provide more complete and accurate hazard information on labels and safety data sheets; updated physical hazard classes to better inform users on safe handling of explosives, aerosols and chemicals under pressure; and updated

precautionary statements on how to safely handle, store and dispose of hazardous chemicals.

The final rule also addresses issues that arose since the implementation of the 2012 standard and improves alignment with other federal agencies and Canada.



Established in 1983, the Hazard Communication Standard provides a standardized approach to workplace hazard communications associated with exposure to hazardous chemicals. OSHA updated the standard in 2012 to align with the third revision of the GHS to provide a common and coherent approach to classifying chemicals and communicating hazard information.

Steve Stankavage, PGCA's Director of EHS, provided his take on the updated standard.



OSHA is closing some gaps in the standard. Moreover, they are closing a rather annoying oversight in the trade secret classification. For example, chemical manufacturers could claim a chemical, including the concentration, could be labeled as a trade secret so long as they have the hazards of the chemical listed. However, if they are just claiming the exact concentration is a trade secret, they must give a concentration range as narrow as possible that will not give away the exact concentration.

Chemicals in secondary packaging are affected. For example, the chemical container inside an outer shipping container/box/drum, etc., must contain the same labeling as the labeling inside.

Finally, manufacturers cannot claim the "label is too small" to print the pictograms and hazardous information on the label for chemical bottles or containers less than 100 mls. in size. The essential details must be on the label.

Overall, printers aren't going to be affected all that much. As the update goes into effect, we will see how the chemical manufacturers present the new information on the labels.

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Contact Steve at sstankavage@printcommunications.org or (570) 579-6497 with any questions on this or any other safety issue.

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