NASF
National Association
for Surface Finishing

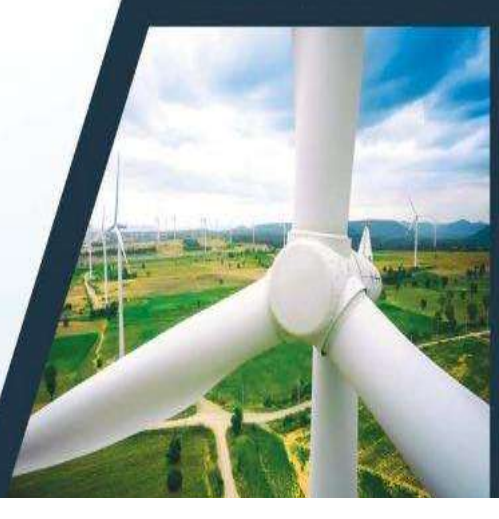
Washington Update | Chicago

Christian Richter
The Policy Group | NASF Government & Industry Affairs

November 20, 2025








Overview

- NASF 2025 Washington Forum
- New Finishing Economic Report
- Regulatory and Litigation Developments
  - ✓ EPA
  - ✓ OSHA
- Questions

NASF Washington Forum | Key Industry Messaging

Resources for 2025

PFAS Legislation & the Surface Finishing Industry

MESSAGE TO CONGRESS

We urge Congress to reject legislation that imposes additional PFAS burdens on surface finishing and ensure oversight on pending EPA rules that could impose a nearly $2 billion impact on the industry.

EPA Recommended PFOS Use – The US EPA in 1995 recommended PFOS-based fume suppressants for use by the plating industry along with other control options to reduce air emissions of hexavalent chromium to meet Clean Air Act standards. Since then, the industry's investment and commitment to innovation has reduced hexavalent chromium air emissions by 99.9% – *from 173 tons to ~100 pounds/year* – a historic environmental achievement.

The Surface Finishing Industry Achieved a Nationwide PFOS Ban – Given early industry concerns over the use of PFOS, NASF approached EPA in 2008 and requested a federal ban from the agency to prohibit its use for surface finishing. The new nationwide EPA restriction went took effect in 2012. The industry – comprised largely of small, family-owned and privately-held businesses – is the only industry to have proactively requested and received a nationwide ban on PFOS from EPA. Since then, the industry has adopted safer PFAS alternatives to PFOS (6:2 fluorotelomer sulfonate) and recently new PFAS-free alternatives have been commercialized for use.

Pending EPA Rules May Impose $2 Billion in Costs to the Finishing Industry Alone – EPA has advanced major regulations to address PFAS, including: (1) a new wastewater discharge rule for the surface finishing industry (scheduled for proposal in May 2026); and (2) Superfund liability for remediation of legacy uses of PFAS (finalized in April 2024). ***These rules could impose nearly $2 billion on the finishing industry for PFAS remediation costs as well as new pretreatment technology on top of the expansive controls for wastewater discharges now in use.***

Facility Burdens and Supply Chain Ramifications – Pending EPA and state regulatory actions could severely burden the industry and disrupt critical supply chains, even though the surface finishing industry represents a tiny fraction of industrial PFAS used (less than 0.3%) and its use was based directly on EPA's recommendation.

Voluntary Projects Are Proceeding – Recently, the NASF has been working closely with its automotive industry customers and partner organizations on a collaborative effort to ensure the elimination of PFAS and voluntarily transition to non-hexavalent chromium coatings. More on the ***Automotive Industry Action Group*** project is here.

Legislative Recommendation – We urge Congress to recognize the success of the industry's sustainability efforts, reject legislation that imposes new PFAS regulatory burdens on surface finishing and exercise close oversight of the potentially severe small business impacts from pending PFAS regulations. The NASF and the industry will continue to work with federal EPA and its key regional offices – as well as with states, the municipal wastewater treatment community and its supply chain partners – to ensure that an environmentally sustainable, technically sound and economically feasible outcome is achieved on PFAS requirements for the surface finishing industry.

For more information, contact: Christian Richter (crichter@thepolicygroup.com or 202-257-0250) or Jeff Hannapel (jhannapel@thepolicygroup.com or 202 257-3756) with NASF.

"Advancing a Sustainable Future"
National Association for Surface Finishing

NASF Economic Report – Executive Summary Update 2025

NASF

2025 EXECUTIVE SUMMARY
National Association for Surface Finishing

EXECUTIVE SUMMARY

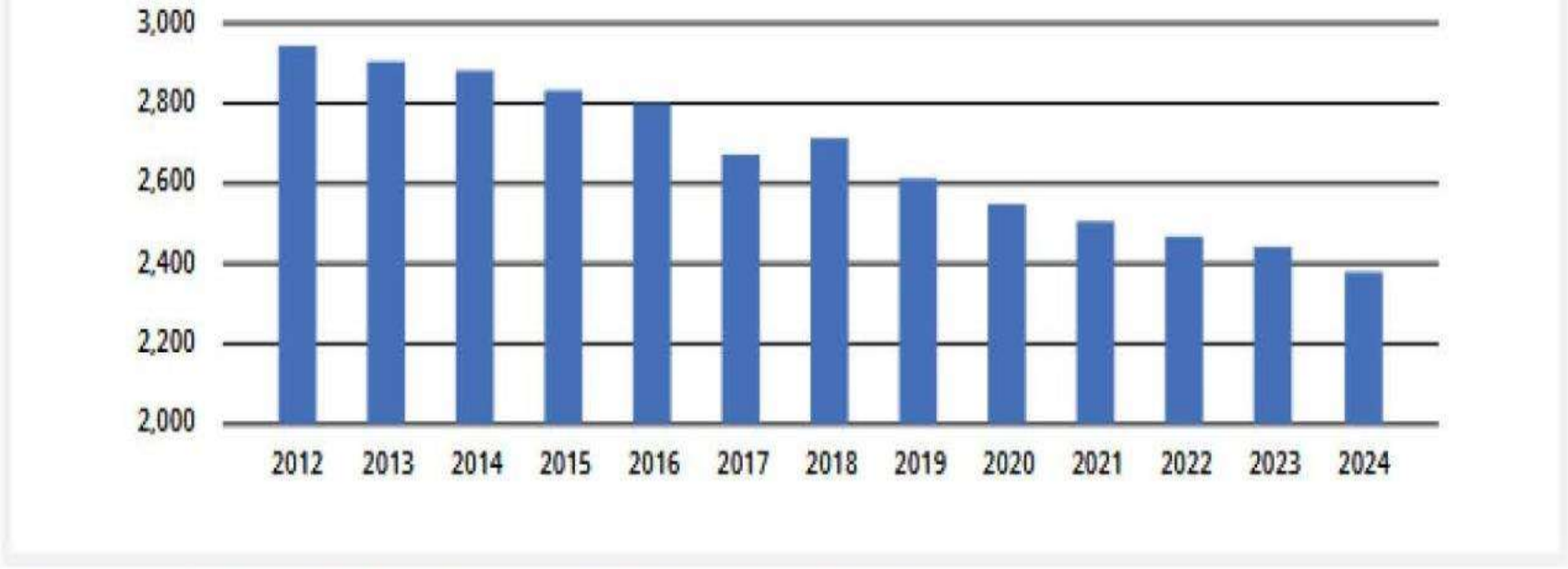
THE U.S. SURFACE FINSIHING INDUSTRY ESSENTIAL INSIGHTS

The U.S. surface finishing industry comprises approximately 2400 small mostly family owned businesses nation-wide that provide specialized coating and engineering services for key U.S. industries. With an annual economic output of nearly $25 billion and 106,000 employees, the industry, including its supply base, is small yet vital to the nation's future. Given its specialized expertise and its unique role in the supply chain, the surface finishing industry is:

- Essential to the U.S. economy
- Critical for national defense and
- Indispensable to the supply chain for key industries like automotive, aerospace, energy and others

Millions of products used or relied upon by consumers are "finished" with some form of coating technology through processes and chemistries that are often not fully appreciated for their role in manufacturing.

US Finishing Industry Size (Establishments)
NASF Report



Source | Bureau of Labor Statistics and Orr & Boss estimates

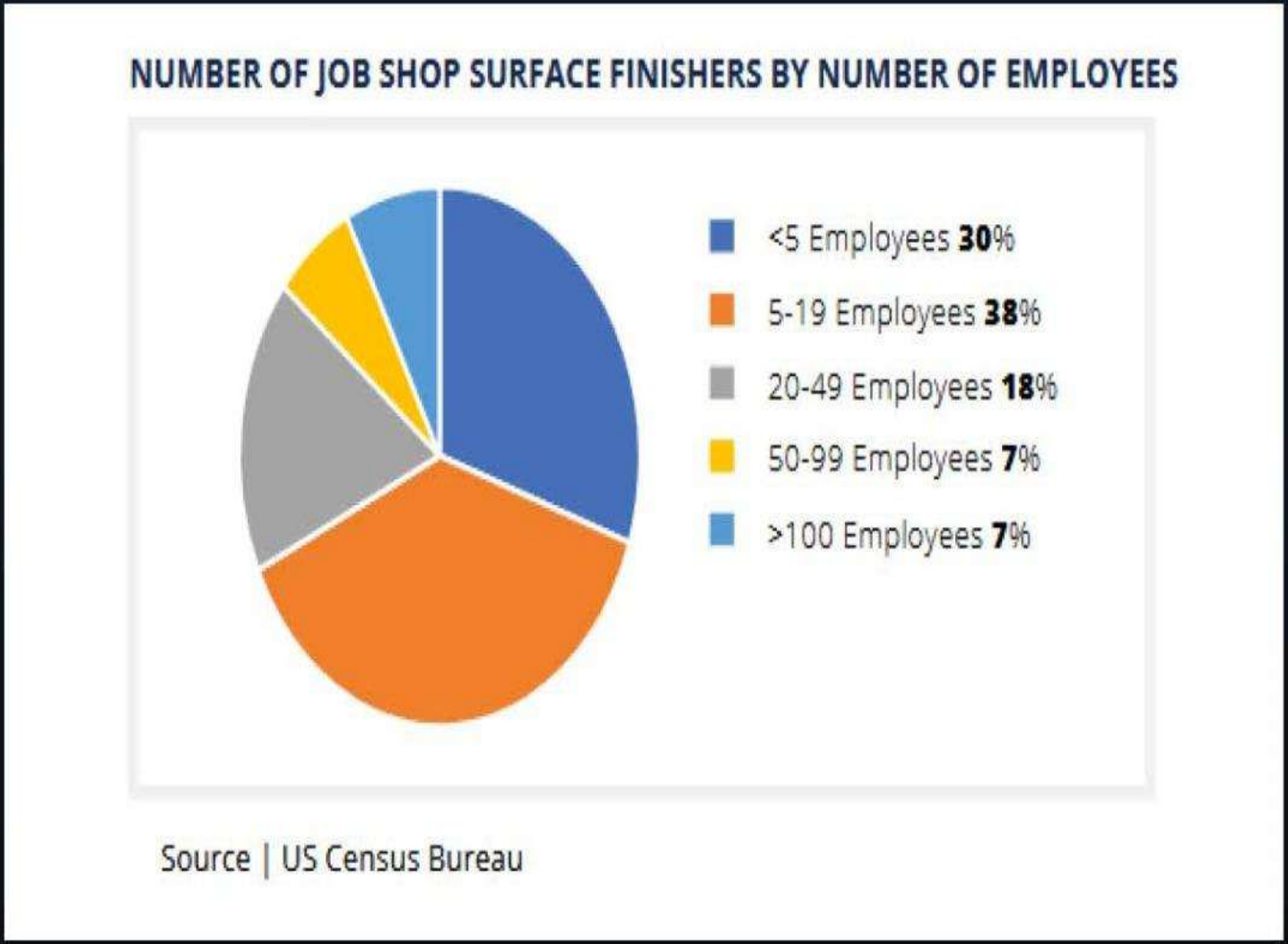
Top States for US Finishing: NASF Report

DIRECT SURFACE FINISHING OUTPUT | # OF EMPLOYERS, AND EMPLOYMENT BY STATE

	OUTPUT (MILLIONS OF $S)	# OF SURFACE FINISHING ESTABLISHMENTS	EMPLOYEES (FTES)
CALIFORNIA	$ 1,715	366	9,090
OHIO	$ 1,227	195	6,506
MICHIGAN	$ 994	173	5,266
ILLINOIS	$ 858	186	4,547
TEXAS	$ 802	152	4,253
INDIANA	$ 561	85	2,971
PENNSYLVANIA	$ 540	109	2,860
WISCONSIN	$ 488	82	2,586
MASSACHUSETTS	$ 425	55	2,254
NEW YORK	$ 394	74	2,088
MINNESOTA	$ 350	63	1,854
CONNECTICUT	$ 333	72	1,767
FLORIDA	$ 248	82	1,313
MISSOURI	$ 245	41	1,299
GEORGIA	$ 212	37	1,123
ALL OTHERS	$ 2,728	611	14,460
TOTAL	$ **12,120**	**2,383**	**64,237**

Sources | Bureau of Labor Statistics, US Census Bureau, and Orr & Boss Estimates

US Finishing Industry's Small Business Footprint
NASF Report



Global Finishing Industry Size (By Region): NASF Report

	OUTPUT (BILLIONS OF $S/YR)	% OF TOTAL
CHINA	$ 42.0	46
EUROPE	$ 18.1	20
NORTH AMERICA	$ 15.1	16
ASIA EX CHINA	$ 12.2	13
SOUTH AMERICA	$ 3.8	4
MIDDLE EAST & AFRICA	$ 0.9	1
TOTAL	$ **92**	**100**

Note | North America includes Canada, the U.S., Mexico & Central America; MEA is Middle East & Africa

U.S. Finishing Industry Economic Output: NASF Report

SUMMARY OF THE INDUSTRY'S ECONOMIC PROFILE

	DIRECT	INDIRECT	TOTAL ECONOMIC IMPACT
OUPUT (MILLIONS $/YR)	$ 12,120	$ 12,484	$ **24,604**
WAGES & SALARIES (MILLIONS $/YR)	$ 3,995	$ 3,362	$ **7,357**
EMPLOYMENT (NUMBER OF JOBS)	64,237	42,299	**106,536**
CONTRIBUTION TO GDP (MILLIONS $/YR)	$ 5,590	$ 5,624	$ **11,213**

From 2022-2024, the industry's output grew by an estimated 8.5% while employment declined by 0.7 percent, indicating an expansion in economic impact while increasing the value of output per employee.

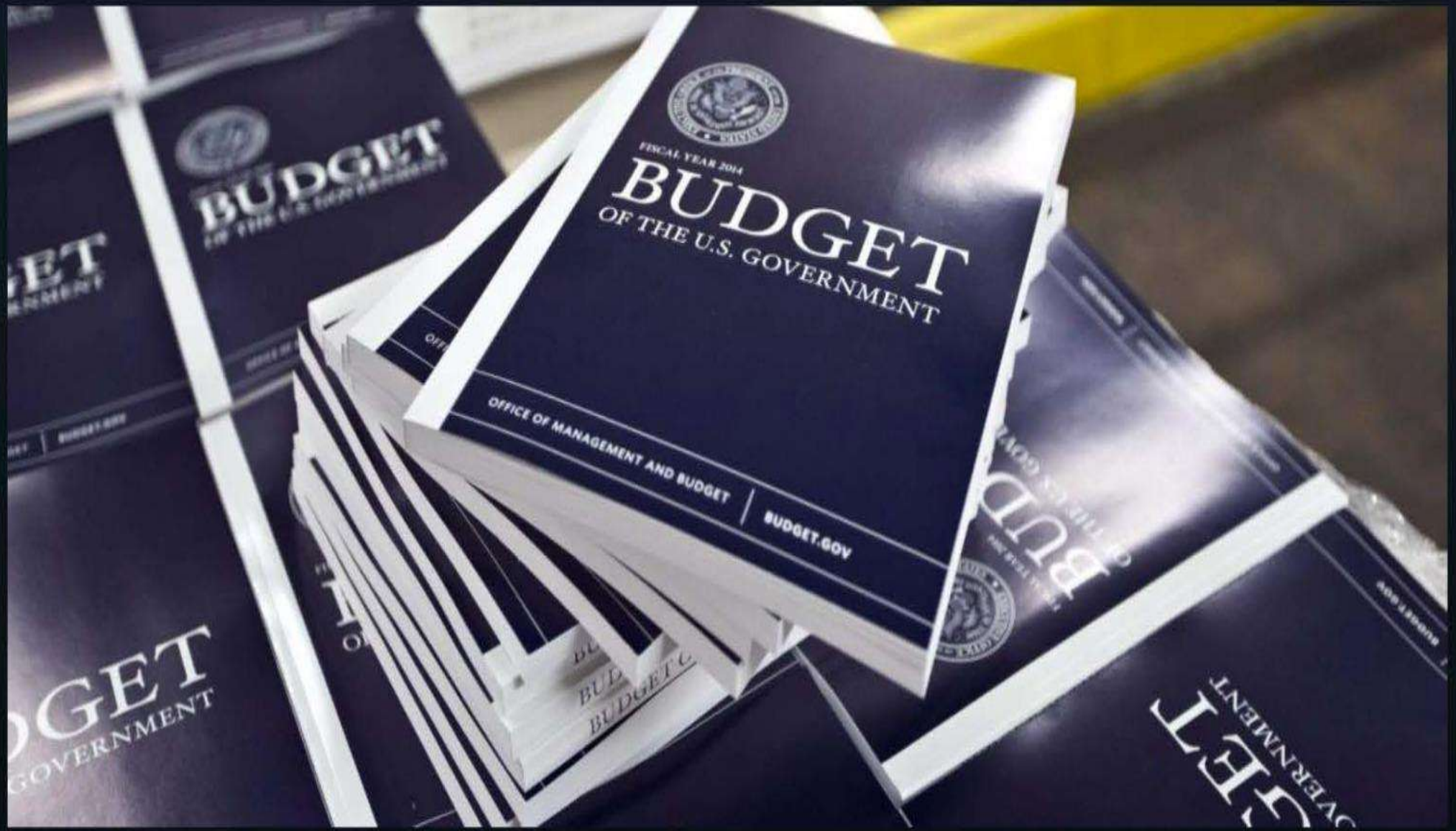
White House Executive Action Has Expanded: "We are Just Getting Started"

Key 2025 Priorities

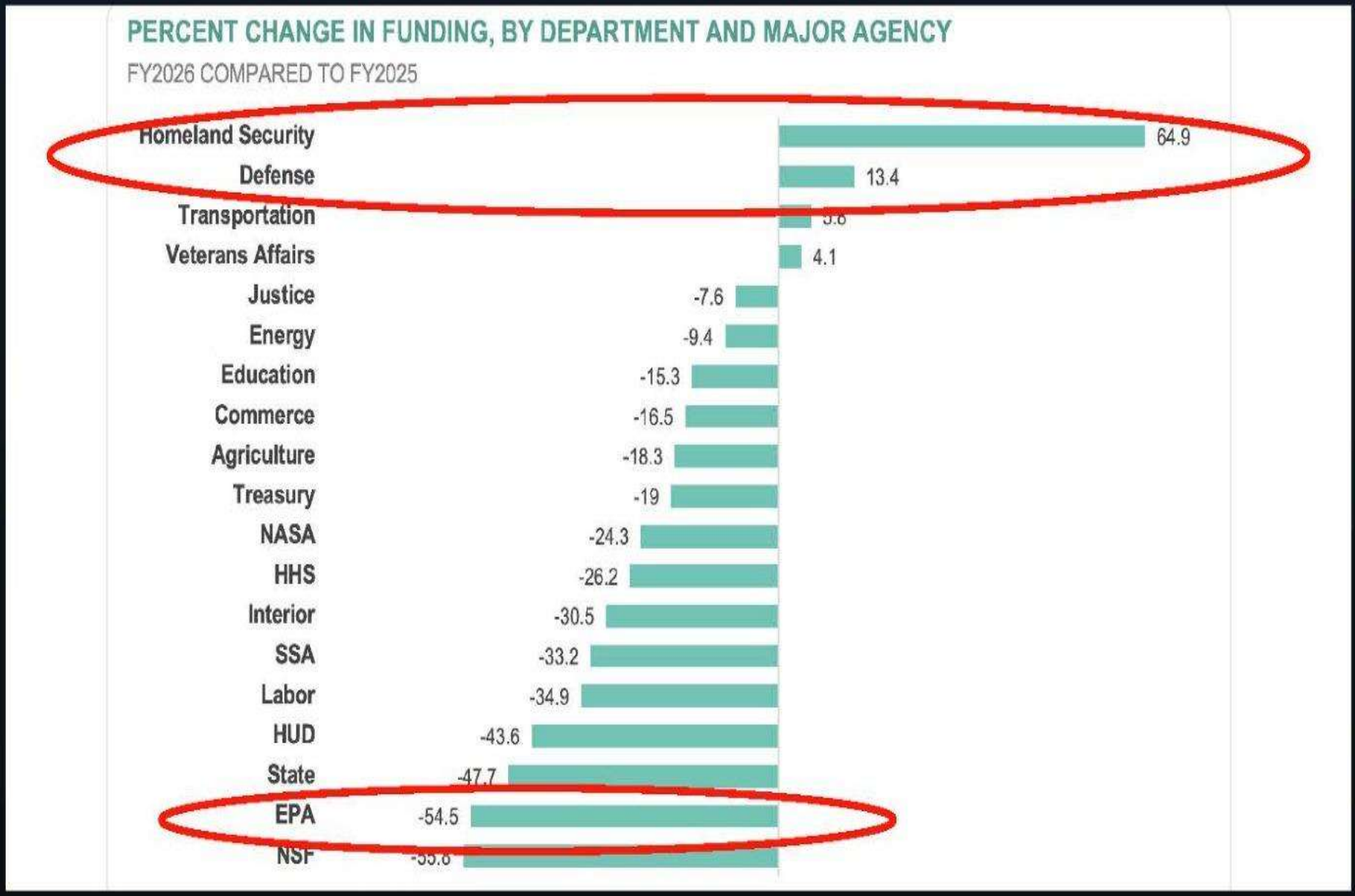
- Deregulate & Reshape Government
- Restructure Trade & Tariff Policies
- Extend & Expand Tax Cuts
- Secure Border & Stem Immigration
- Curb Inflation
- Lower Energy Prices

The President's Budget for 2026 | Proposed Cuts to Agencies

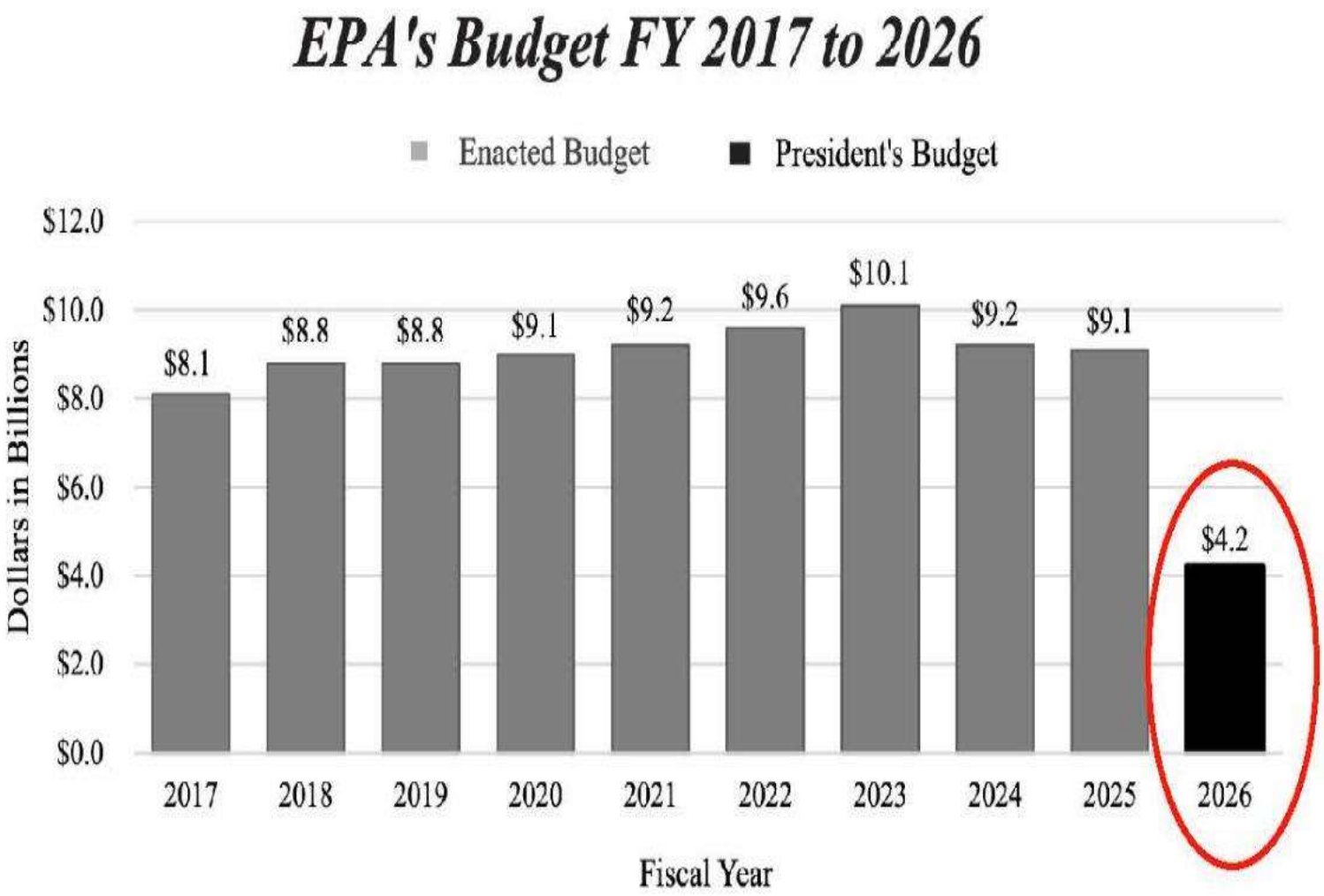
Fiscal Year Started Oct 1



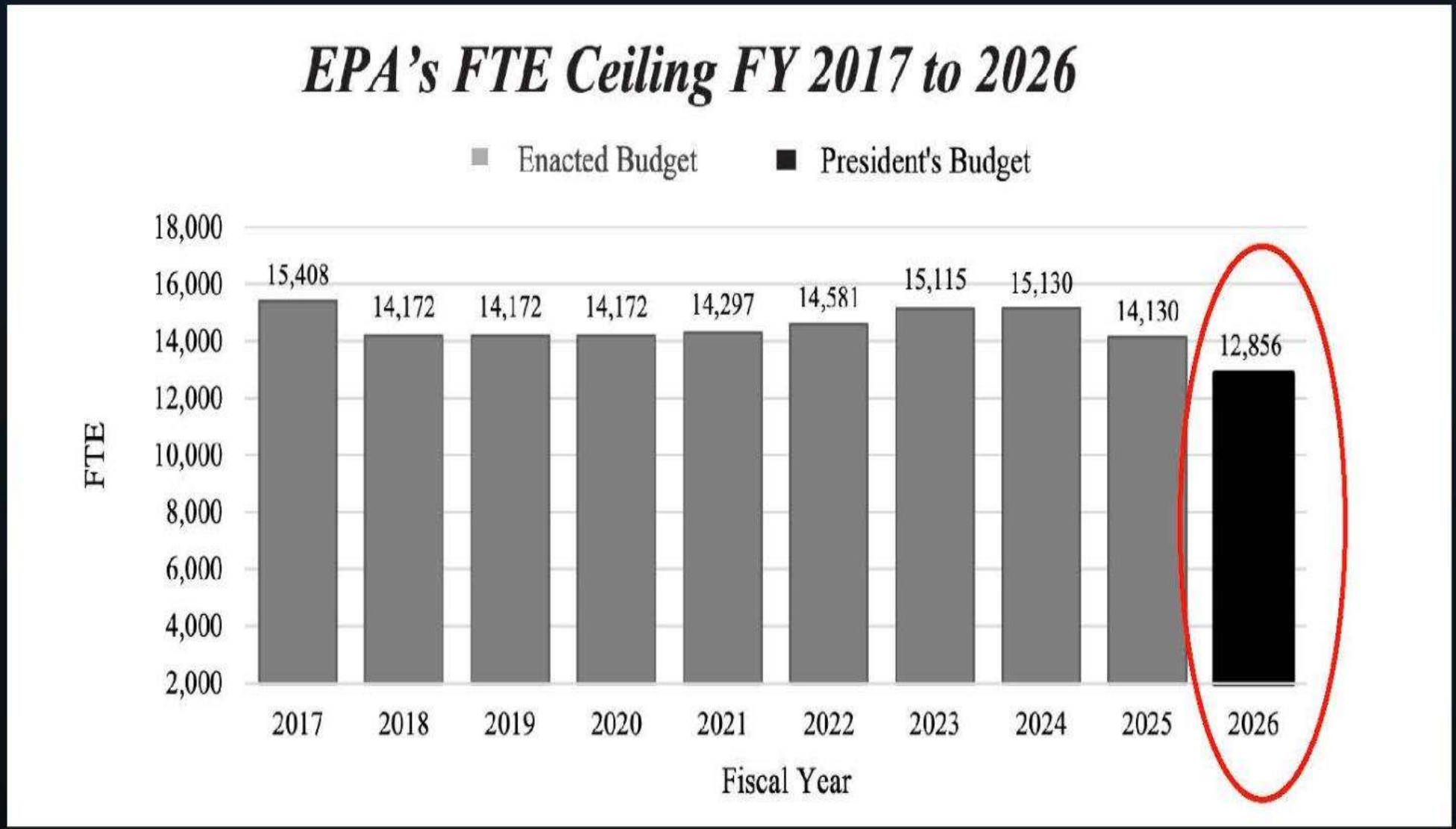
The President's Budget: Major Budget Increases and Cuts for FY 2026



White House Cuts Proposed for EPA | A Closer Look



White House Cuts Proposed for EPA | Personnel Reductions



EPA Political Leadership

"EPA is protecting our air, land and water, and the safety of American workers while supporting a thriving economy."

"In our first 200 days, EPA has taken more than 200 actions and counting to improve the environment and human health."

-- EPA Administrator Lee Zeldin

EPA Engagement and Outlook on Key Finishing Industry Issues

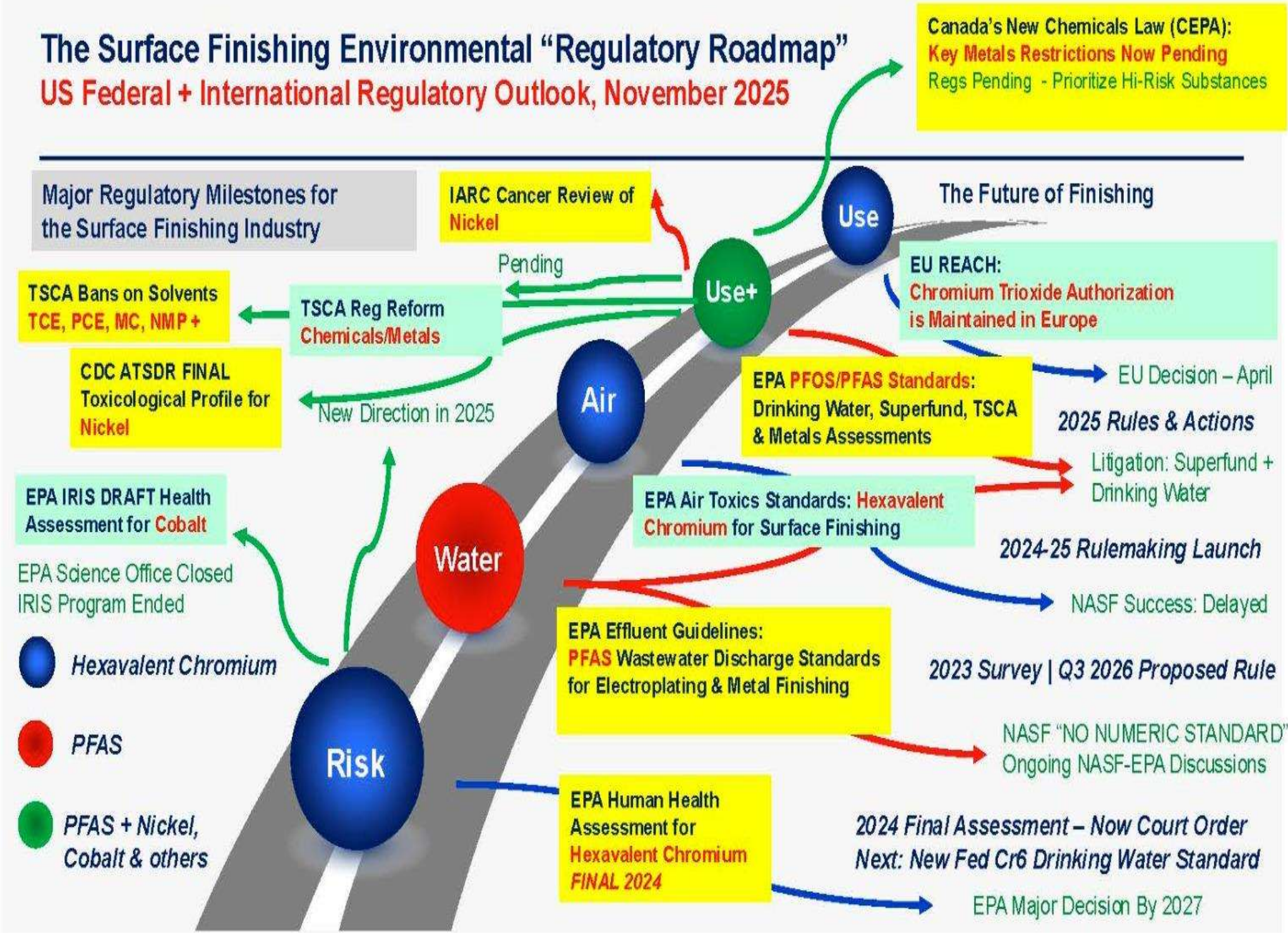
Air, Water, Chemicals, Waste

Peggy Brown, Acting Chief
EPA Office of Water

Aaron Szabo, Chief
EPA Office of Air

The Surface Finishing Environmental "Regulatory Roadmap"

US Federal + International Regulatory Outlook, November 2025

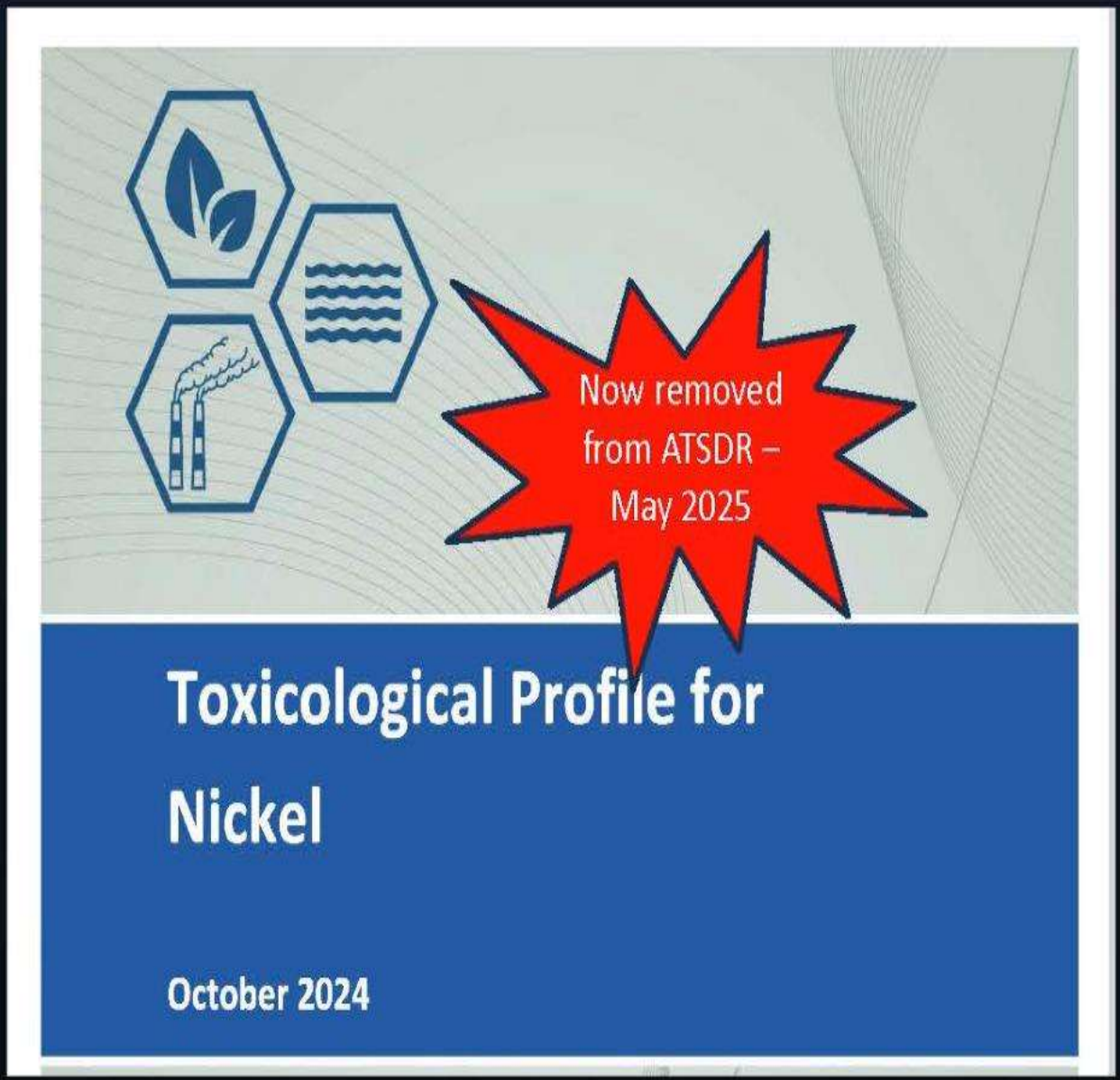


Beyond EPA there is New Regulatory Attention: Does Nickel Metal Cause Cancer?

Two Key Developments:

- US CDC Health Profile for Nickel
- International Cancer Classification for Nickel Metal

Nickel Risk to Human Health: Latest Expert Science Assessment Will Drive Future Restrictions | U.S. Centers for Disease Control



ATSDR Agency for Toxic Substances and Disease Registry

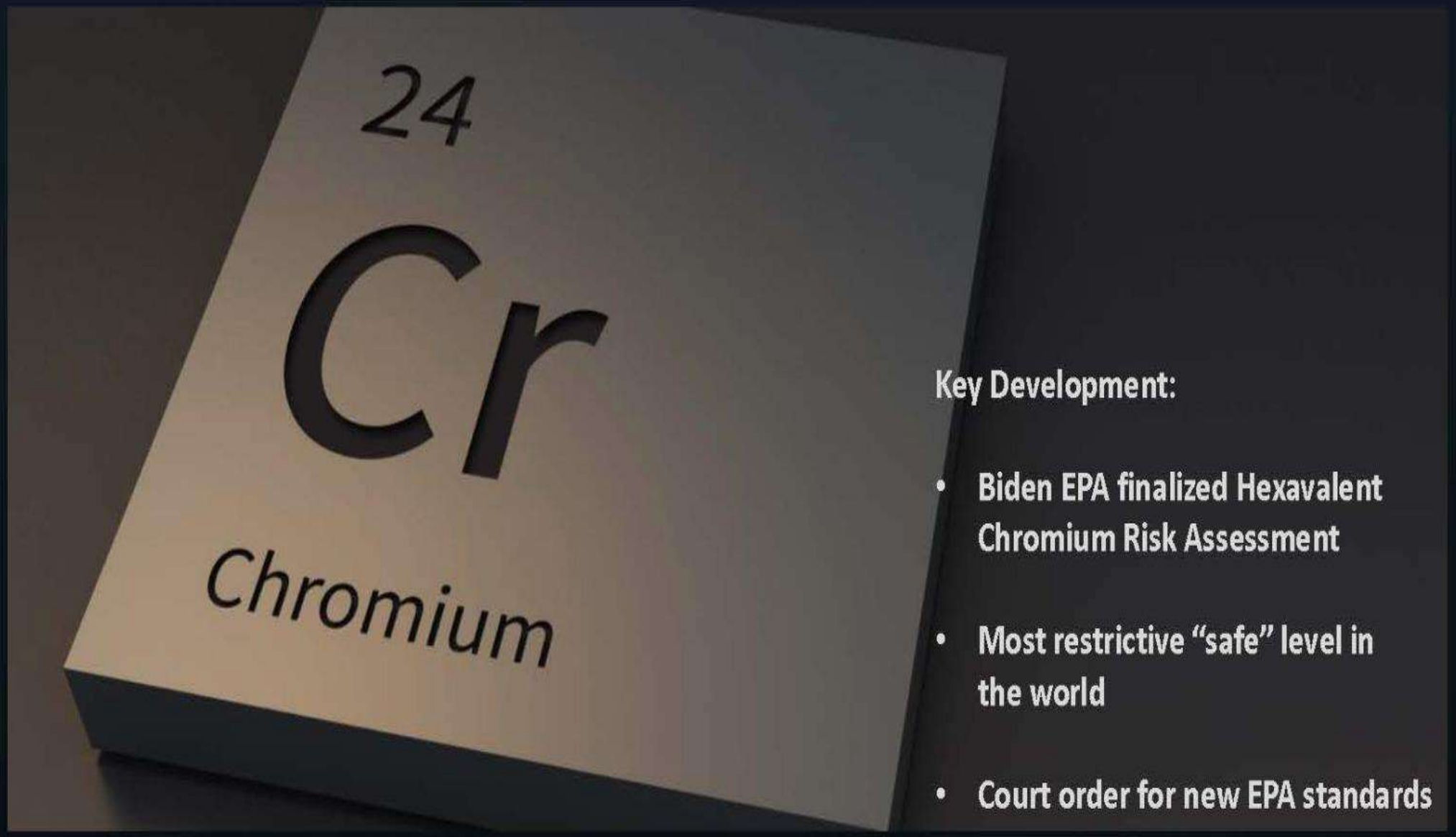
Agency for Toxic Substances and Disease Registry

Final Risk Profile – November 2024

Lowest "safe" human exposure level (inhalation) in the world – set at ambient background levels

- ✓ Based on the wrong nickel compound Not produced in the U.S.
- ✓ ATSDR viewed as "gold standard" by state, local and global regulators
- ✓ First Step in Major Risk Assessment for EPA and other wide-ranging rules
- ✓ **May 2025 – Nickel Profile Removed by ATSDR | NEW VERSION PENDING**

Challenge: The Future of the Biden EPA's Hexavalent Chromium Study



Key Development:

- Biden EPA finalized Hexavalent Chromium Risk Assessment
- Most restrictive "safe" level in the world
- Court order for new EPA standards

EPA's Final Health Assessment for Hexavalent Chromium | 2024

EPA United States Environmental Protection Agency

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Federal Register Notices

Peer Review of the Integrated Risk Information System (IRIS) Toxicological Review of Hexavalent Chromium

EPA's Office of Research and Development has requested that the SAB review the draft EPA IRIS Toxicological Review of Hexavalent Chromium. The draft assessment includes a hazard identification analysis, which summarizes the chemical properties, toxicokinetics, and health effects associated exposure, and dose-response analysis, which characterizes the quantitative relationship between chemical exposure and each credible health hazard. These quantitative relationships are used to derive cancer and non-cancer toxicity values (e.g., inhalation unit risk, oral slope factor, reference concentration, reference dose).

EPA's Final Health Assessment for Hexavalent Chromium | 2024

How did it compare with current drinking water standards?

EPA's new "safe" concentration

Final EPA Decision: Revised the "safe" level to range of <1 to 10 ppb

Drinking Water Standards by Agency

Health Canada — 50 ppb

World Health Organization

EPA — 100 ppb

Texas Commission on Environmental Quality

* Background levels in U.S. are 1-5 parts per billion

Court Order: EPA MUST Finalize a New Federal Drinking Water Standard for Cr6

Final Decision must be made within 3 Years of EPA's Health Assessment

NASF Initiative with Automotive OEMs: Hexavalent Chromium + PFAS

Focus: Voluntary Supply Chain Collaboration vs. Regulatory Mandates

Automotive Industry Action Group

AIAG is the global automotive industry's collaborative hub — uniting OEMs, suppliers, and service providers to create best-in-class processes for quality, supply chain, and sustainability. By fostering open collaboration and shared expertise, we drive progress and empower companies of all sizes to shape the future of automotive excellence.

PFAS: The Environmental Issue of Our Time | Metal Finishing in "Top Two" Industry-Specific Regulations

EPA PFAS Rule: Metal Finishing Effluent Guidelines

September 2025 Regulatory Agenda

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View Rule

View EO 12866 Meetings | Printer-Friendly Version | Download RIN Data in XML

EPA/OW **RIN:** 2040-AG24 **Publication ID:** Spring 2025

Title: Revisions to the Metal Finishing Effluent Guidelines to Address PFAS Discharges in Chromium Electroplating Wastewater

Abstract:

As announced in the Effluent Guidelines Program Plan 15 at 88 FR 6258 (January 31, 2023) under this action, the EPA is revising the Metal Finishing Effluent Limitation Guidelines at 40 CFR part 433 to address discharges of per- and polyfluoroalkyl substances in wastewater from chromium electroplating facilities.

Agency: Environmental Protection Agency(EPA)
RIN Status: Previously published in the Unified Agenda
Major: Undetermined
EO 14192 Designation: Regulatory

Priority: Other Significant
Agenda Stage of Rulemaking: Long-Term Actions
Unfunded Mandates: Undetermined

EPA PFAS Rule: Metal Finishing Effluent Guidelines

September 2025 Regulatory Agenda

Timetable:

Action	Date
NPRM	07/00/2026

Regulatory Flexibility Analysis Required: Undetermined

Small Entities Affected: Businesses, Governmental Jurisdictions

Included in the Regulatory Plan: No

Sectors Affected: 332813 Electroplating, Plating, Polishing, Anodizing, and Coloring

RIN Data Printed in the FR: No

Schedule: Metal Finishing PFAS Rulemaking

Pending Plans for Facility Sampling & Data Collection from EPA

Industry Profile
Identification of Regulated Facilities

Fall 2022

Data Collection
Industry Survey, Site Visits, and Sampling

Now Delayed

Analysis of Data
Pollutant Loadings, Limitations, Public Comments

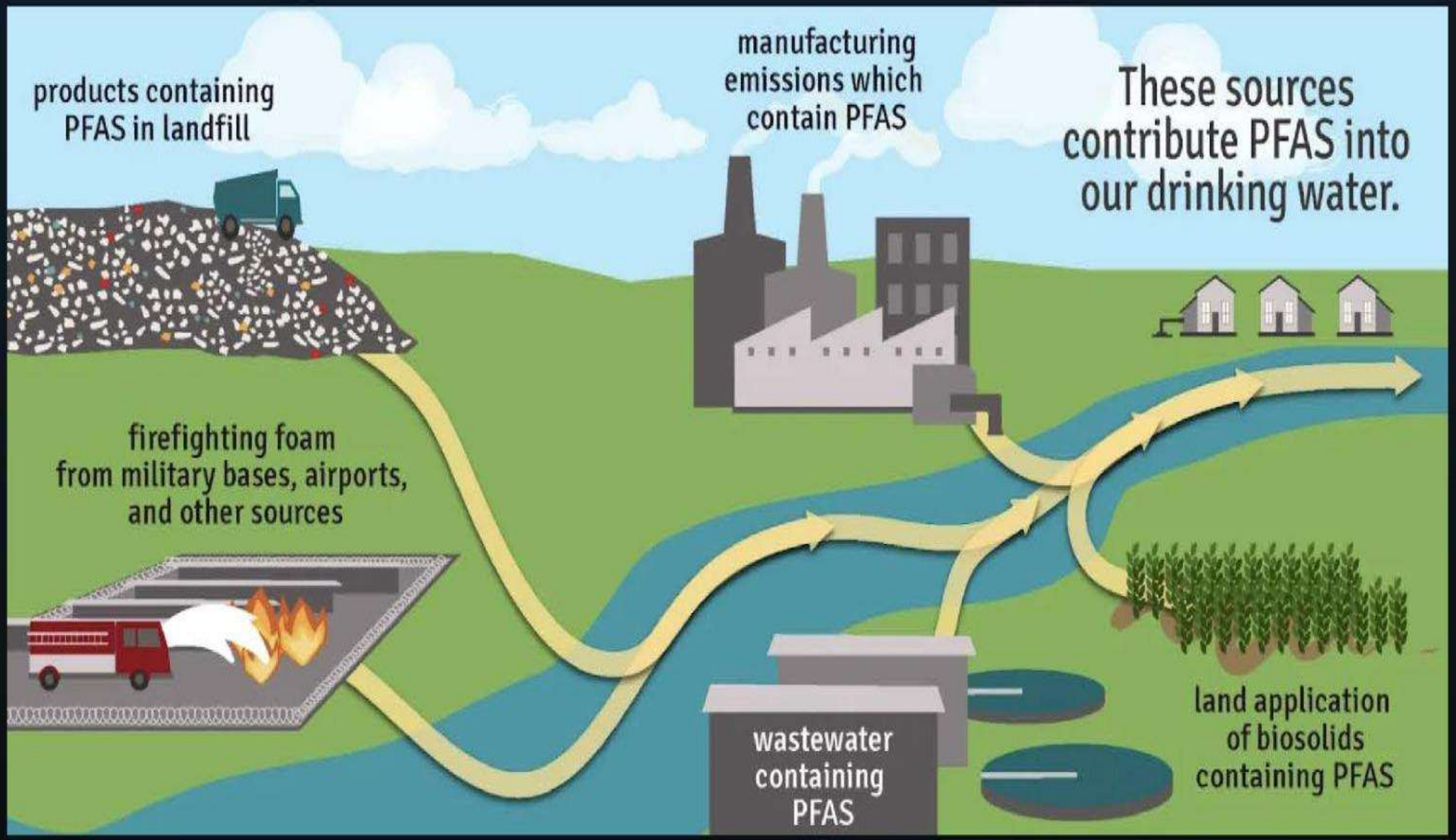
Proposed Rule
Formulation of Options and Decision Making

July 2026

"EPA should recognize the success of the industry's [PFOS] elimination efforts and avoid imposing new PFAS regulatory burdens on surface finishing that may have potentially severe small business impacts."

- NASF PFAS Policy Brief
September 2025

EPA Biosolids Risks Under Review for PFAS: Land Application Concerns



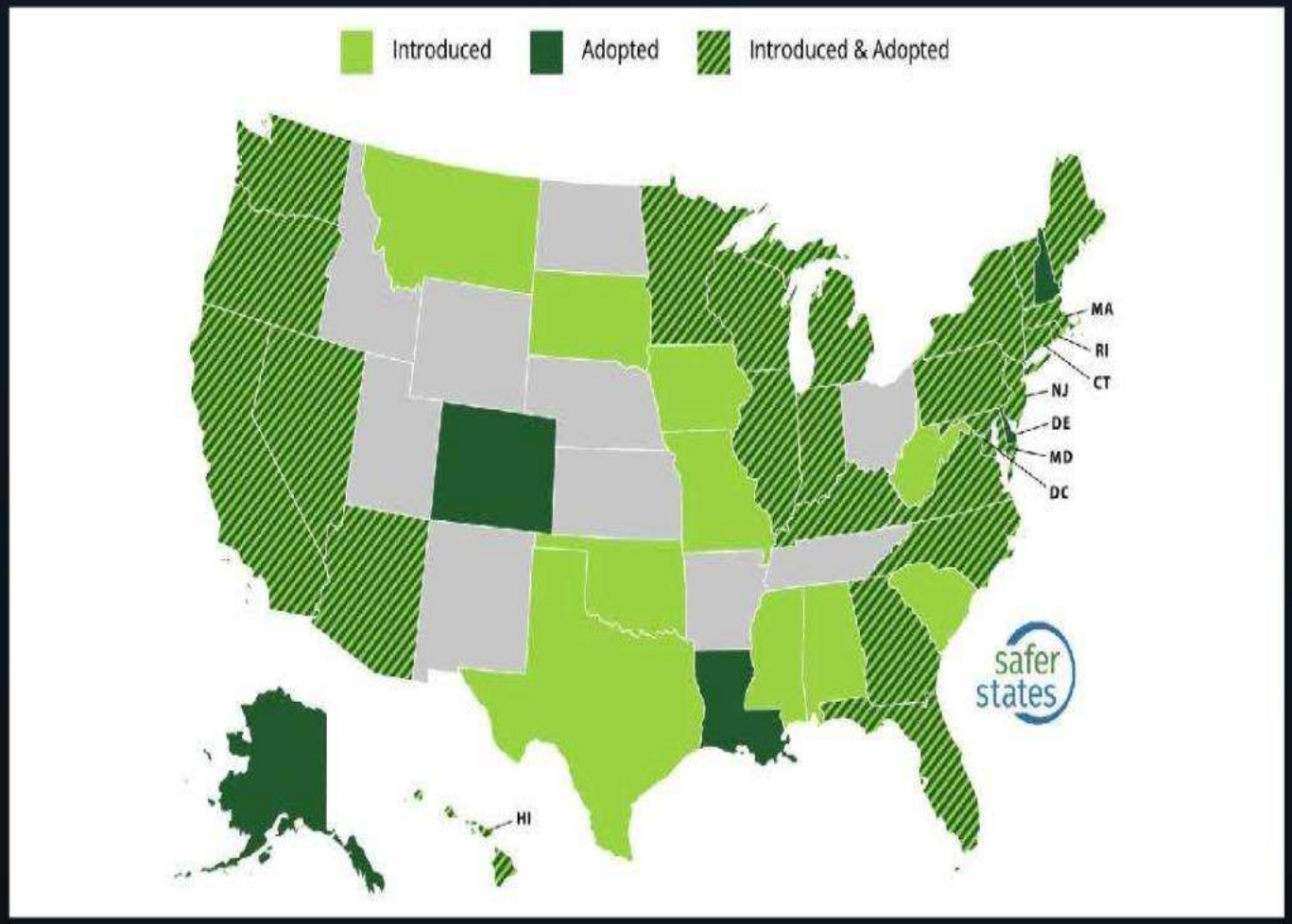
Trump EPA Has Kept Biden 2024 PFAS Listing for Superfund Cleanup Liability

Major Industry Opposition & Litigation |

Pending: Biden-Era PFAS Drinking Water Rule

Major Opposition and Litigation

State Legislation for PFAS: Status & Outlook | The Headlines for Consumers



Policies Targeting PFAS

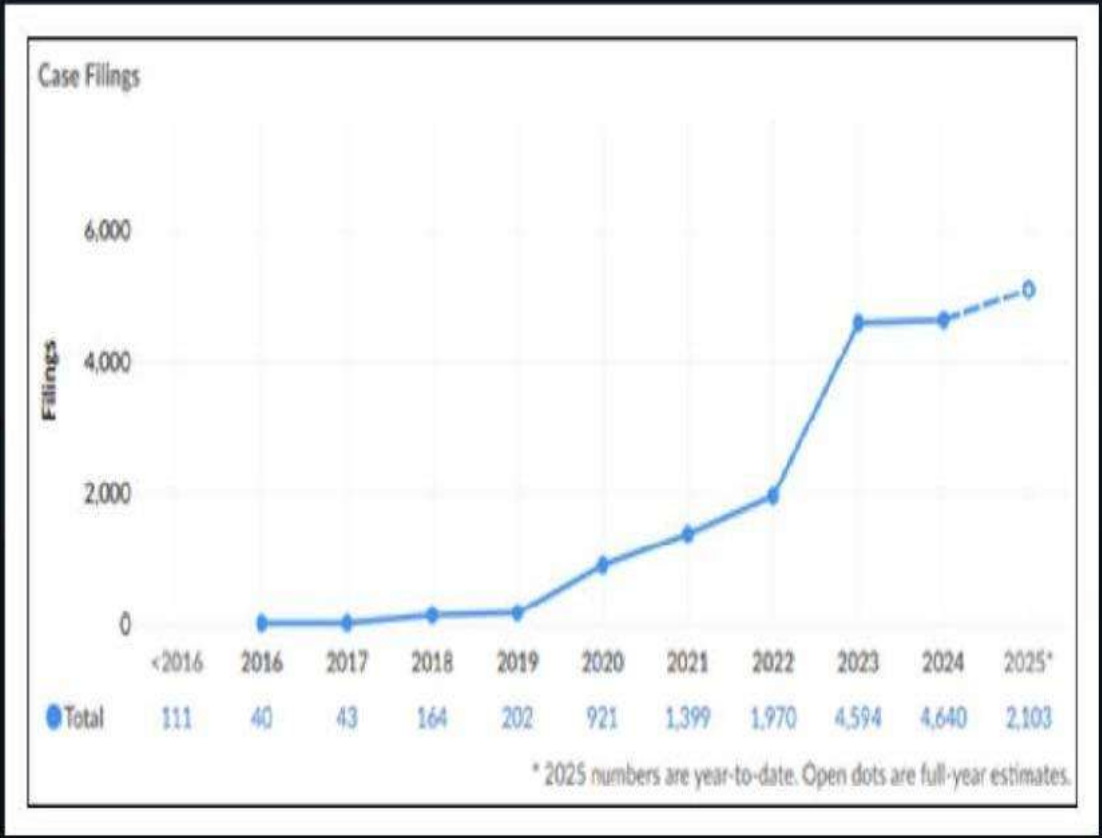
- 30 states have adopted 175 policies
- 35 states have proposed 220 policies
- More activity expected ahead

Outlook for PFAS Regulation: Downstream Users

"Litigation is broadening to target not only chemical manufacturers but also consumer goods companies, secondary manufacturers, and downstream users."

-- Stephanie Feingold, Morgan Lewis
Washington, DC
June 2025

PFAS Litigation: Developments Are Unfolding in 2025



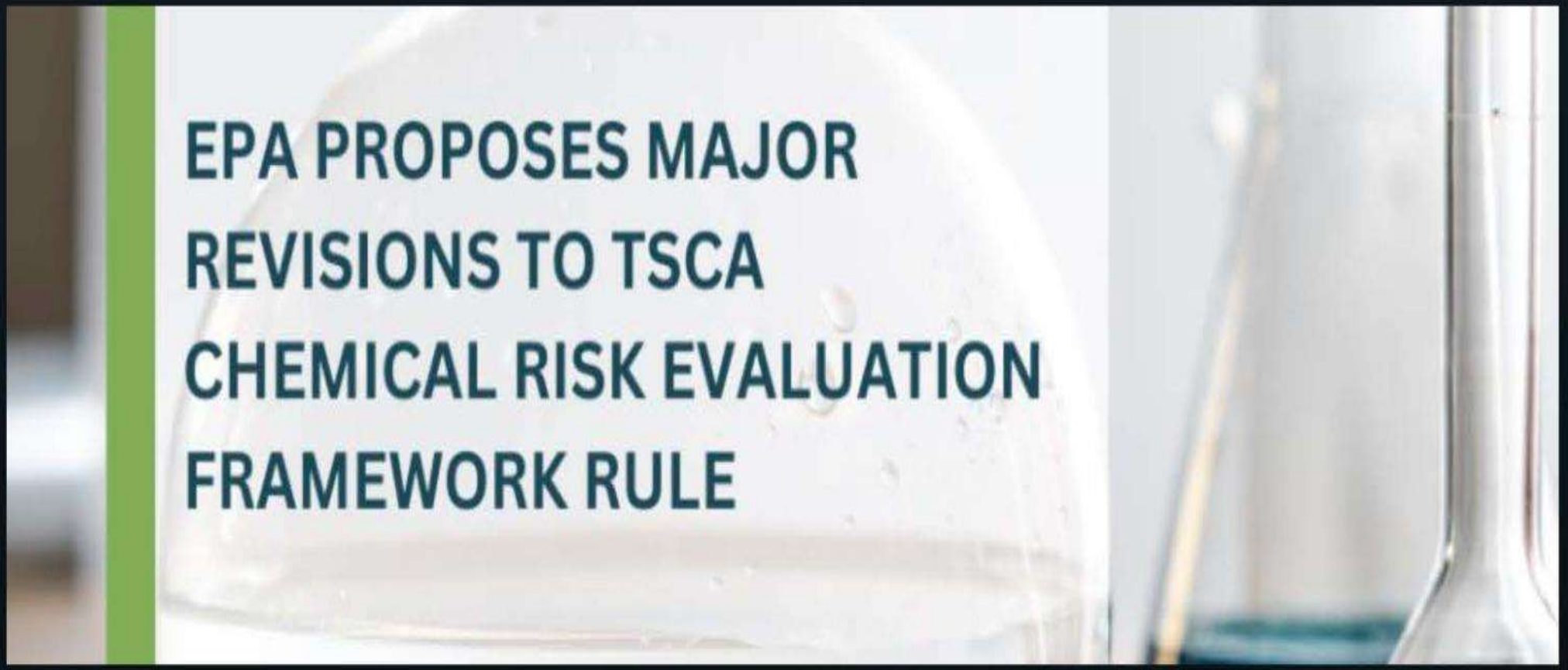
- PFAS litigation is expanding across plaintiffs, defendants, and industries
- Defendant universe now moving to industrial users, not just PFAS manufacturers
- Major settlements pushing plaintiffs to target "downstream users"
- Municipalities: "Who else contributed to PFAS?"
- Magnitude: PFAS litigation could exceed asbestos-scale with unprecedented risk

Nationwide PFAS Litigation is Being Consolidated in South Carolina

Status: Moving Beyond Firefighting Foam and Manufacturers Only

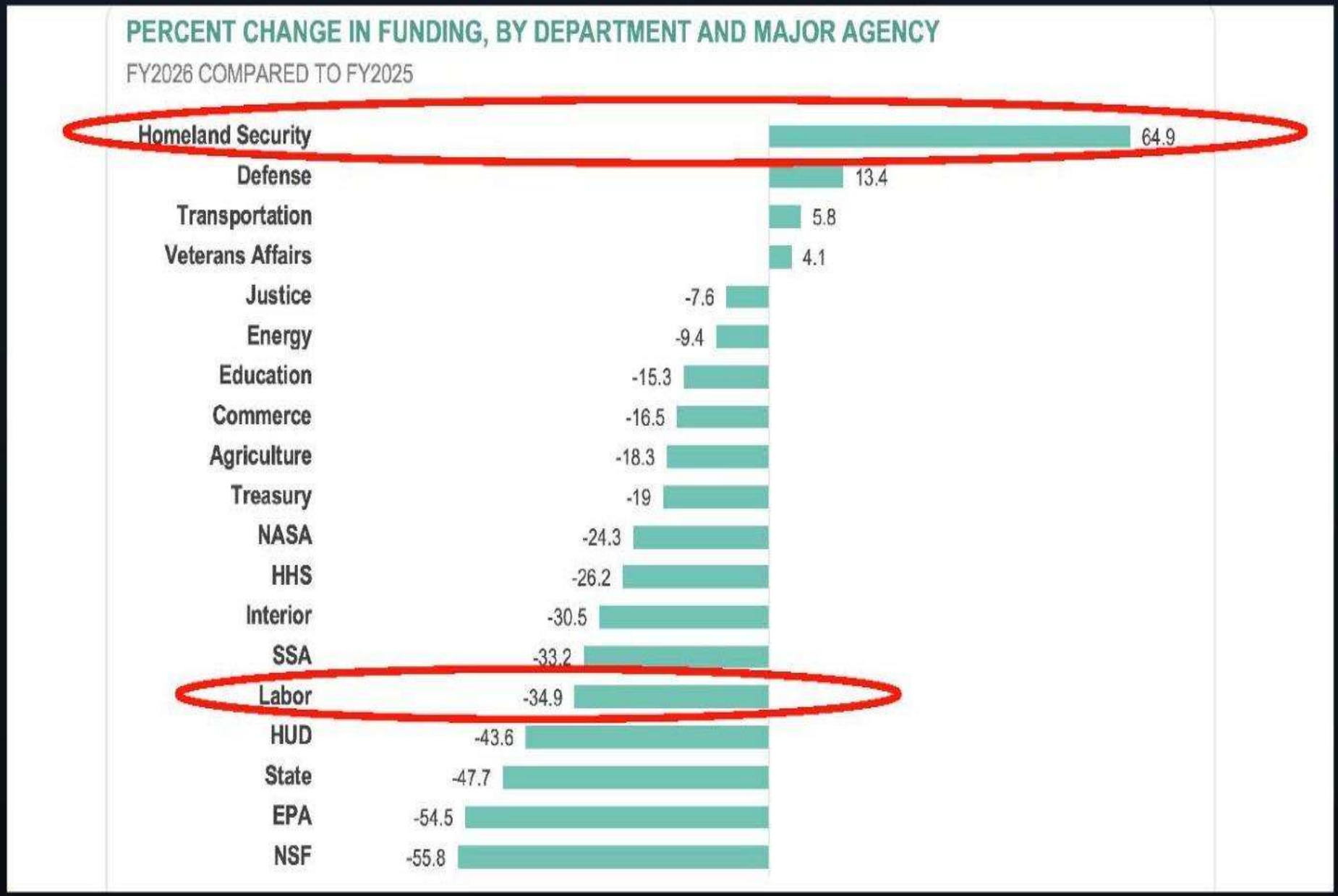
- **Total Cases:** Over 10,000 cases have been added to the MDL since 2018, now likely exceeding 12,000.
- **MDL Focus:** The MDL consolidates claims related to PFAS contamination caused by aqueous film-forming foam (AFFF), used in firefighting.
- **Case Types:** Range of claims such as property damage, personal injury, and natural resource damage.

Major Announcement Last Week: EPA Launches Revisions to US Chemicals Management Rules | Implications for Finishing



Labor and Employment: Shifting Balance Back to Employers, but New Rules Ahead

The President's Budget: Major Budget Increases and Cuts for FY 2026



OSHA Funding Outlook: President's Proposed Budget for FY 2026

Trump Budget Plan Proposes Big Cuts to OSHA, Lowering Head Count and Limiting Enforcement Capabilities

Major Deregulation Announcement from the Department of Labor – July 2025

U.S. DEPARTMENT OF LABOR

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News Release

SECRETARY CHAVEZ-DEREMER UNVEILS AGGRESSIVE DEREGULATORY EFFORTS IN PUSH TO PUT THE AMERICAN WORKER FIRST

WASHINGTON – U.S. Department of Labor Secretary Lori Chavez-DeRemer today announced the department's initial deregulatory efforts, which aim to cut regulatory burdens, spur job creation, and fuel economic opportunity for American workers and businesses.

OSHA "Big Picture" Outlook

OSHA®

Occupational Safety and Health Administration

Major Ongoing OSHA Rulemaking Proposal: Heat Injury and Illness Prevention

OSHA Heat Rule: Hearings Held June & July + Comments Closed on September 2, 2025

OSHA's Informal Rulemaking Hearing for Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings

Dates and Times	Organization/Group/Individual
Monday, June 16, 2025	
9:30 AM ET	**Welcoming Remarks** Amanda Wood Laihow Acting Assistant Secretary of Labor for Occupational Safety and Health
	OSHA, Staff Housekeeping Remarks
	Introduction and Hearing Guidelines Administrative Law Judge
	American Federation of Labor and Congress of Industrial Organizations (AFL-CIO) (30 minutes) Rebecca Reindel Chenay Arberry Ayusha Shrestha
	U.S. Chamber of Commerce (10 minutes) Marc Freedman

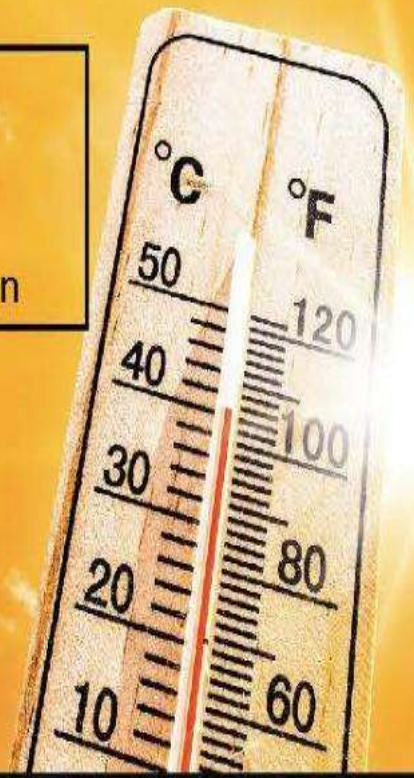
Industry's Position: Two Views on the Heat Rule

What Might Industry Want for a New OSHA Heat Standard

PRESS RELEASE:
Nevada OSHA Heat Illness Regulation Approved

Performance-based Standard:

- one-time job hazard analysis
- written safety program
- employee training on heat illness prevention



Thank You

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