

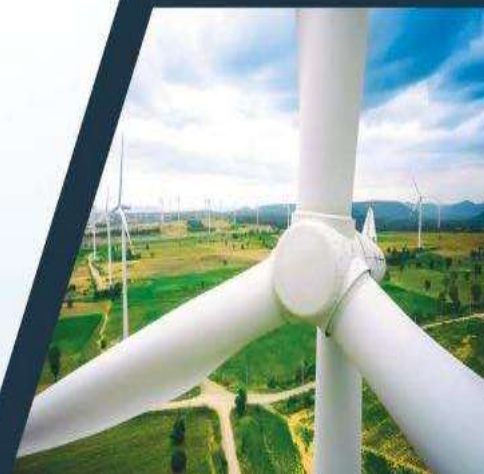


National Association
for Surface Finishing

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 flame 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 into 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 advocated 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 expensive 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 Hannapell (jhannapell@thepolicygroup.com) or 202-257-3756 with NASF.

"Advancing a Sustainable Future"
National Association for Surface Finishing

NASF The Surface Technology Initiative Aerospace & Defense Coatings



- Cadmium (Cd)
- Chromium (Cr)
- Chromate Conversion
- Nickel (Ni)
- Zinc-Nickel (Zn/Ni)
- Anodizing
- Ceramics – wear
- Ceramics – thermal barrier
- Thin Film Coatings
- Polymer Coatings
- Precious metal coatings (Au, Pt, Pd, Ag, Rh, etc.)

Chromium

Hard chrome plating – Wear and corrosion resistance – hydraulics, landing gear, other highly stressed components

Chromate conversion – Aluminum structure and skin – corrosion and paint adhesion on structural components, fasteners exposed parts

Chromate primers – Skin panels, structural components, areas exposed to harsh environments, and enhance corrosion resistance when used in conjunction with chromate conversion coatings

Nickel

Nickel Plating – Hardness, wear, corrosion resistance for engine components, bearings, electronics, etc. where durability is critical

Electroless Nickel Plating – Hardness, wear, corrosion resistance for complex-shaped components such as manifolds, gears, valves

Cadmium

Cadmium Plating – Corrosion protection of steel parts, fasteners, electrical connectors, lubricity, low electrical resistance

Zinc-Nickel Plating – Alternative to cadmium, non-toxic, higher performance

Anodizing

Sulfuric and Chromic Acid Anodizing – Used on almost all structural components, skin panels, etc. – hard, erosion, corrosion-resistant finish, improves paint adhesion

Ceramics

Thermal Spray – Abrasion, hardness, corrosion resistance for landing gear, engines and to protect turbine engine section components from melting

Polymers

1. External paint system
2. Paint on all dashboard gauges, trim, knobs
3. Aluminum/Zn filled dip-coat fastener coatings
4. Televisive polymer coatings on window drives
5. Fabric and leather coatings – against fire, stains, bacteria, water, static shock
6. E-coat to prevent or reduce corrosion

Thin Film

Thin Film Coatings – Of lenses, windows, optical infrared transmission

Precious

Gold & Other Cr – electronics, avionics, connectors – (Au, Pt, Pd, etc.)



The Surface Technology Initiative Automotive Coatings

- Nickel (Ni)
- Zinc (Zn)
- Chromium (Cr)
- Polymer
- Cu, Al, Au, Sn, Pd and Other



Zinc (Zn)

1. Zn plate on parts/frame improved corrosion resistance
2. Zn plate on fasteners, fluid tubes, connectors, brackets
3. Zn, Fe, & Mn phosphates paint adhesion, corrosion and break-in wear

Cu, Al, Au, Sn, Pd and Other

1. Copper under decorative coatings, electronics
2. Gold, silver, tin on all electronics
3. Diamond-like carbon on fuel injectors
4. Aluminum on light reflectors
5. Hydrophobic coatings for "wood" interior trim
6. Nitrocarburizing for wear components
7. Platinum, palladium, rhodium for catalytic converters to reduce pollution
8. Optical coatings – sunglasses, smart glass
9. Thin aluminum, Cr for car mirrors
10. Powder coating for wheels
11. Anodizing – pistons, rings, and slides
12. Conversion coatings on Zn, Zn/Ni, steel
13. Tie alloy coatings for bearings

Nickel (Ni)

1. Electroless Ni for plating on plastics
2. Ni plate under decorative chrome
3. Electroless Ni for wear, corrosion – pistons, poppet valves, brake systems, fuel lines, gears
4. Ni for decorative trim
5. Ni plated magnesium to reduce weight
6. Electroless Ni to stop radio interference
7. Ni plating for electronic circuit, substrates
8. Electroless Ni/Pd/Au for wire bond, soldering
9. Electroless Ni/Pd for fuel injectors

Chromium (Cr)

1. Hard Cr on valve stems, shocks, brake cylinders, fuel injection nozzles
2. Decorative Cr on interior and exterior trim, wheels, knobs, insignia

The National Association
for Surface Finishing
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NASF.org

NASF Economic Report – Executive Summary Update 2025



2025 EXECUTIVE SUMMARY National Association for Surface Finishing

EXECUTIVE SUMMARY

THE U.S. SURFACE FINISHING INDUSTRY ESSENTIAL INSIGHTS

The U.S. surface finishing industry comprises approximately 2400 small mostly family owned businesses nationwide 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:

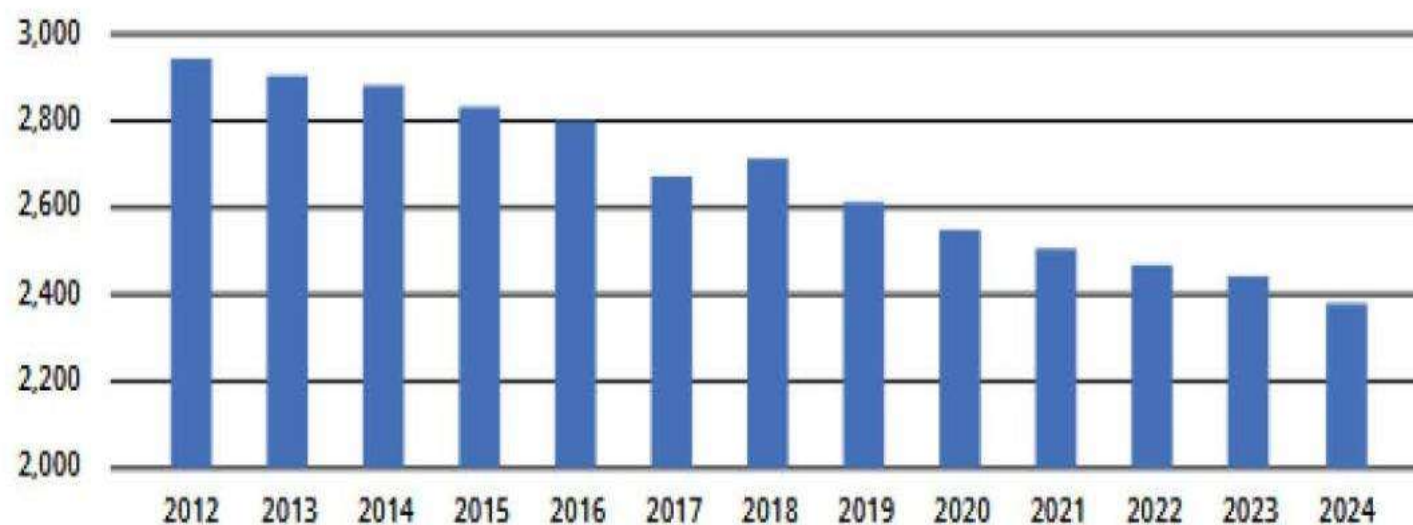
- Essential to the U.S. economy
- Critical for national defense and
- Indispensable to the supply chain for key industries like automotive, aerospace, energy and others

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

NUMBER OF JOB SHOP SURFACE FINISHING ESTABLISHMENTS



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

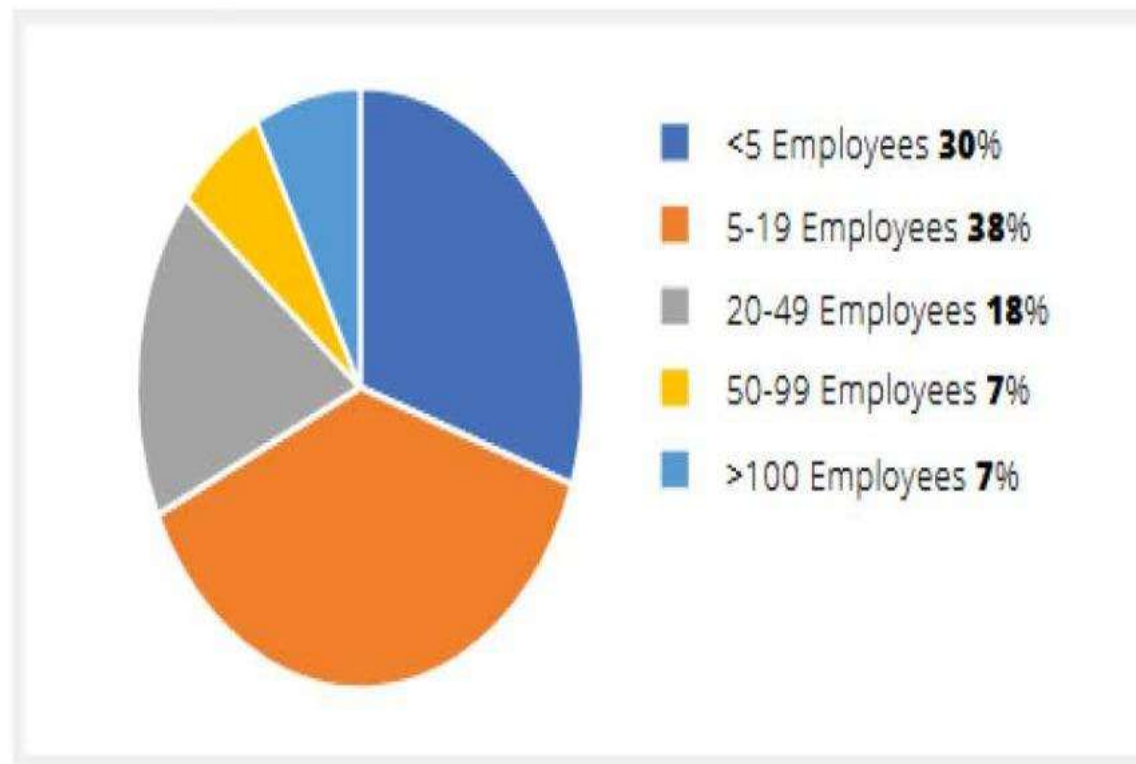
	OUTPUT (MILLIONS OF \$S)	# OF SURFACE FINISHING ESTABLISHMENTS	EMPLOYEES (FTES)
CALIFORNIA	\$ 1,715	366	9,090
OHIO	\$ 1,227	195	6,506
MICHIGAN	\$ 994	173	5,266
ILLINOIS	\$ 858	186	4,547
TEXAS	\$ 802	152	4,253
INDIANA	\$ 561	85	2,971
PENNSYLVANIA	\$ 540	109	2,860
WISCONSIN	\$ 488	82	2,586
MASSACHUSETTS	\$ 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

NUMBER OF JOB SHOP SURFACE FINISHERS BY NUMBER OF EMPLOYEES



Source | US Census Bureau

Global Finishing Industry Size (By Region): NASF Report

	OUTPUT (BILLIONS OF \$/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”

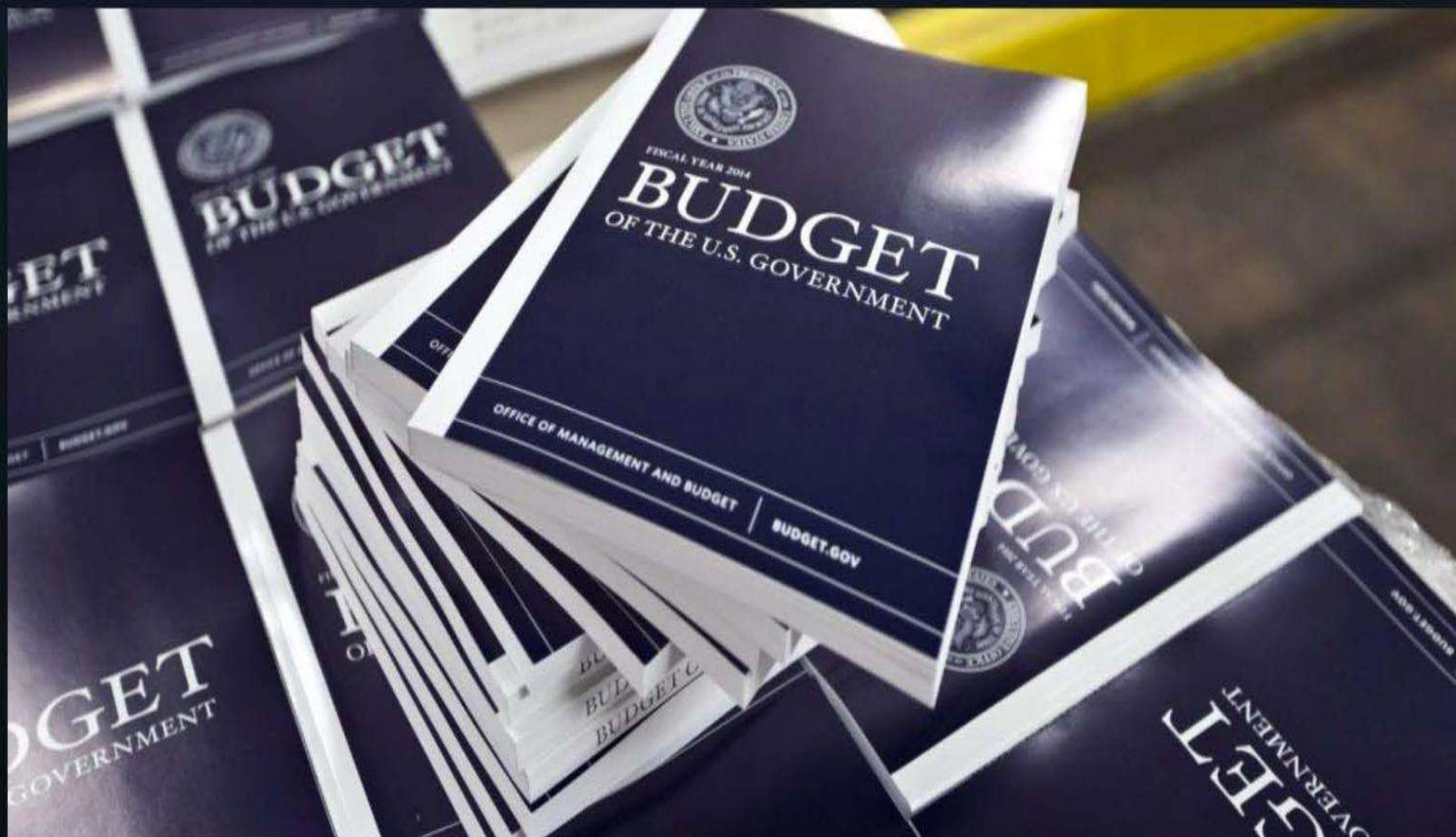
Key 2025 Priorities

- 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



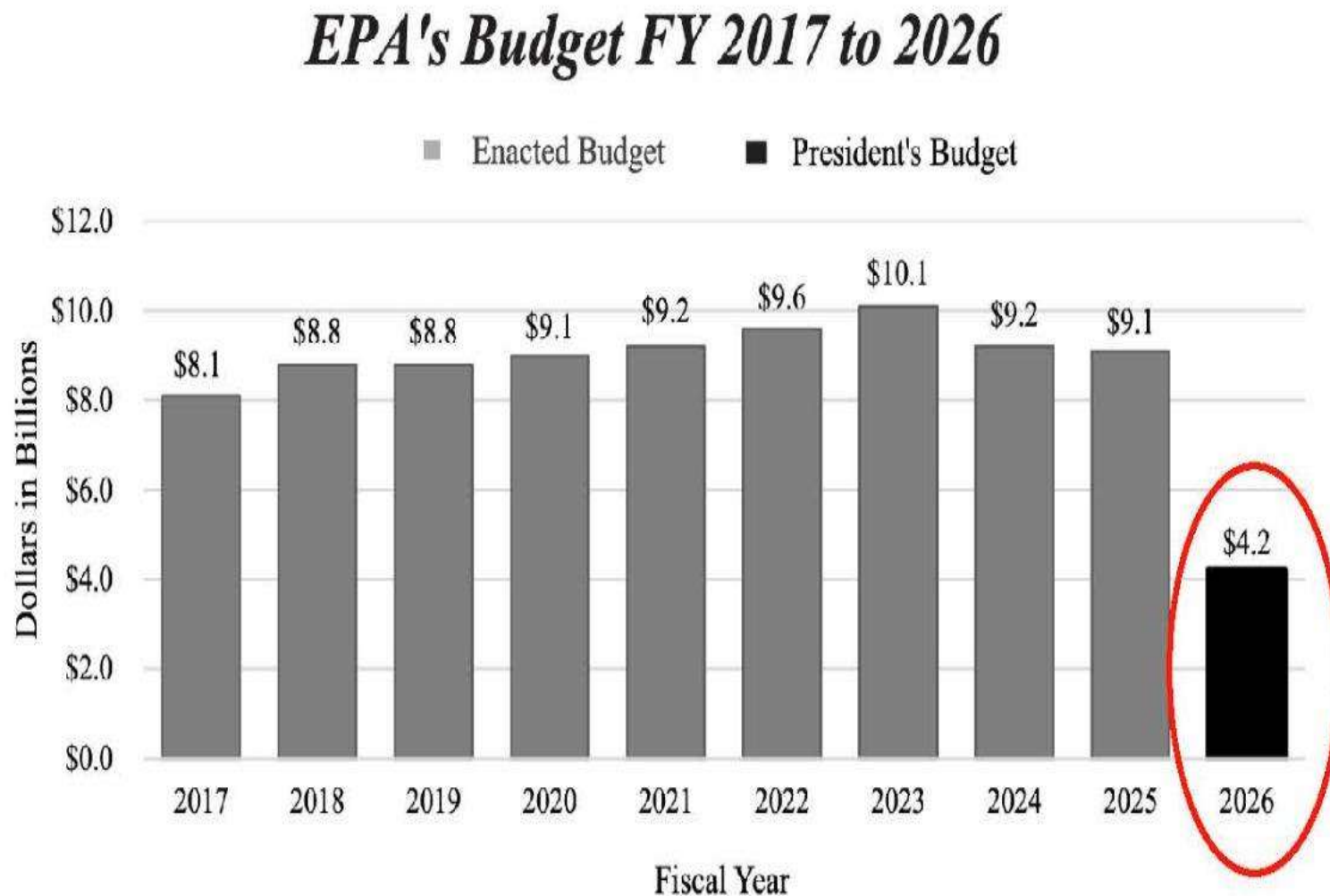
The President's Budget: Major Budget Increases and Cuts for FY 2026

PERCENT CHANGE IN FUNDING, BY DEPARTMENT AND MAJOR AGENCY

FY2026 COMPARED TO FY2025

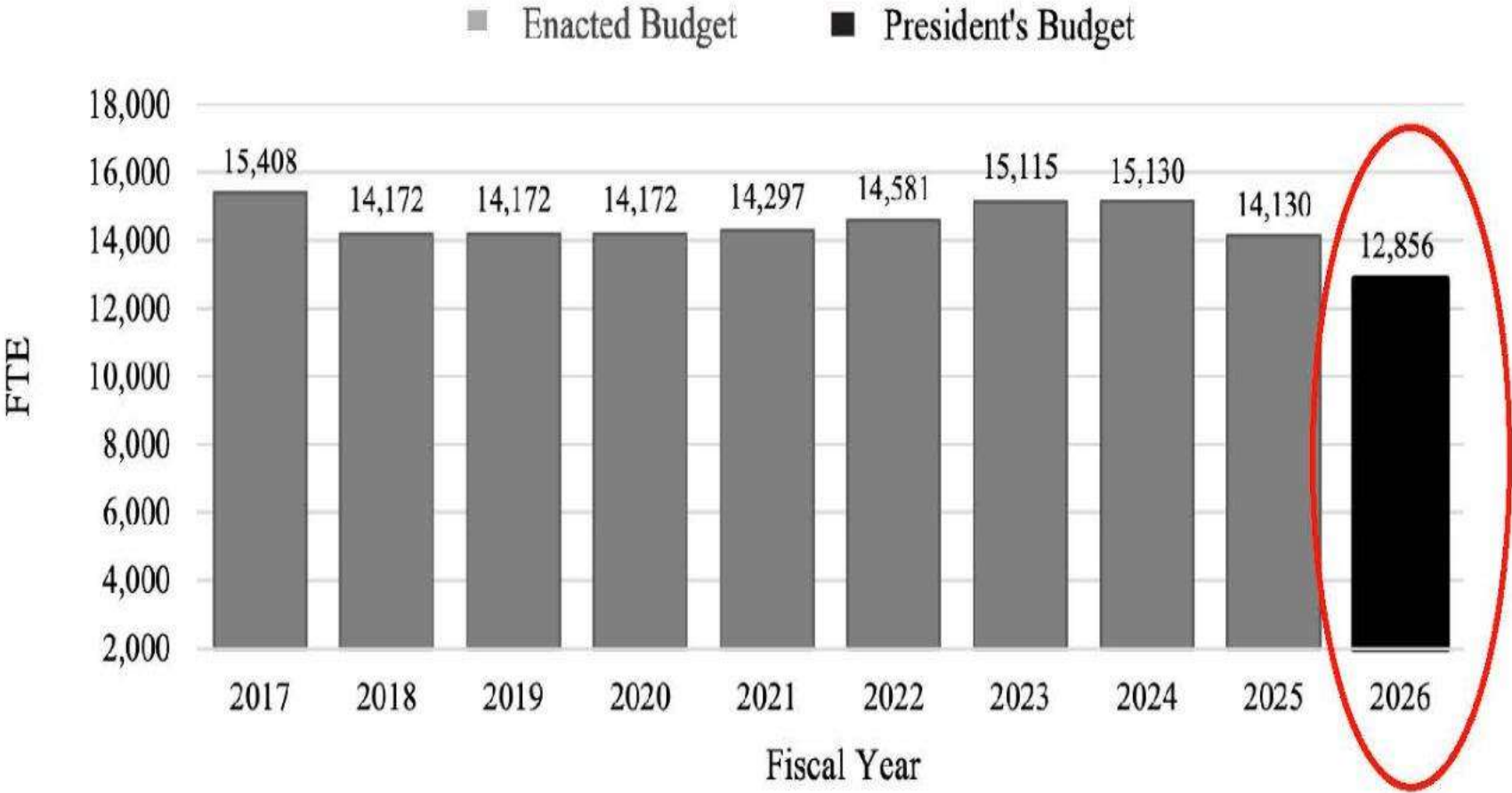


White House Cuts Proposed for EPA | A Closer Look



White House Cuts Proposed for EPA | Personnel Reductions

EPA's FTE Ceiling FY 2017 to 2026



EPA Political Leadership



**Lee Zeldin, Administrator
Environmental Protection Agency**

“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



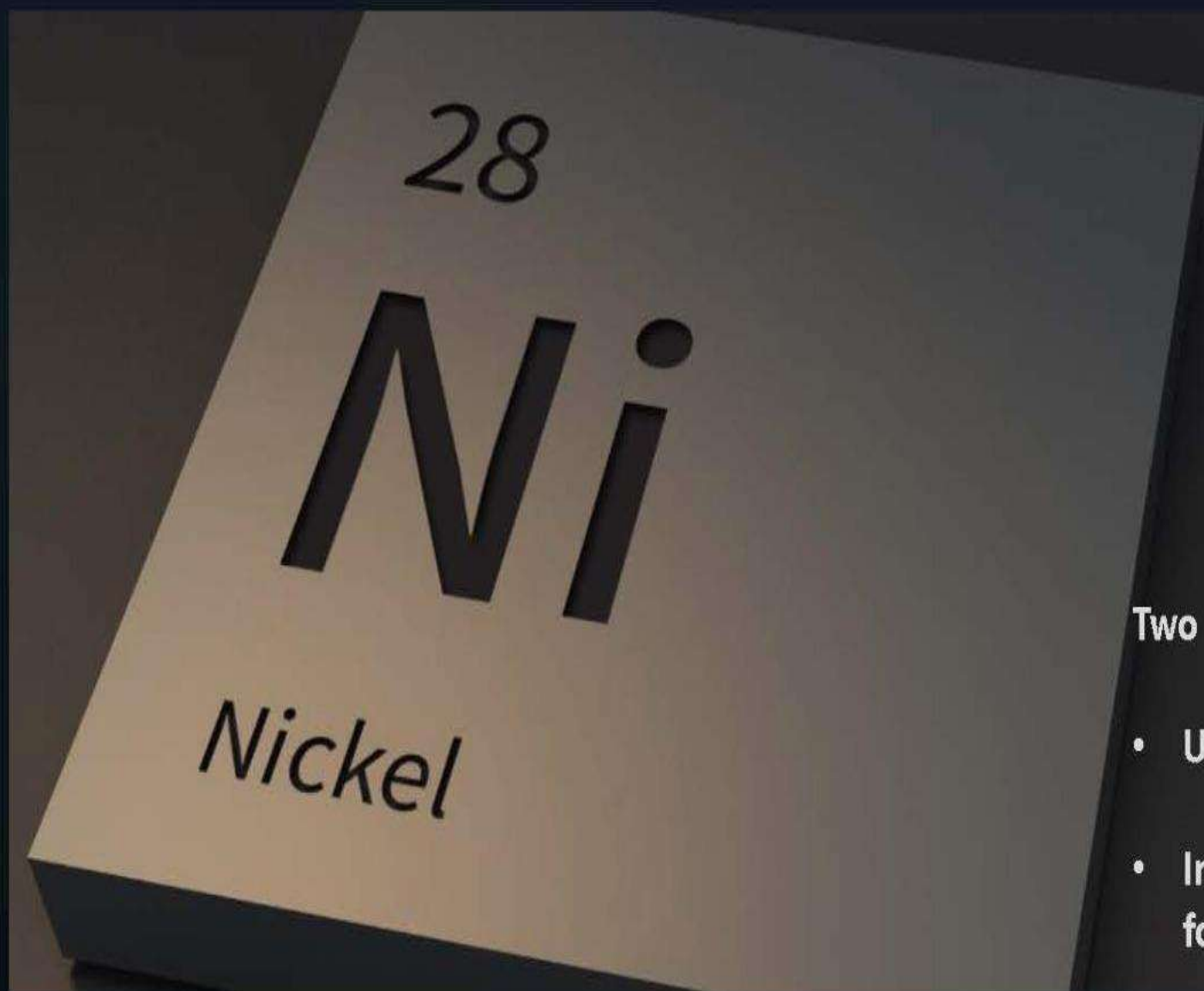
Aaron Szabo, Chief
EPA Office of Air

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?



A 3D-rendered periodic table tile for Nickel (Ni) is shown at an angle. The tile is light gray with black text. At the top is the atomic number '28'. Below it is the chemical symbol 'Ni' in a large, bold font. At the bottom is the word 'Nickel' in a smaller, italicized font.

Two Key Developments:

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

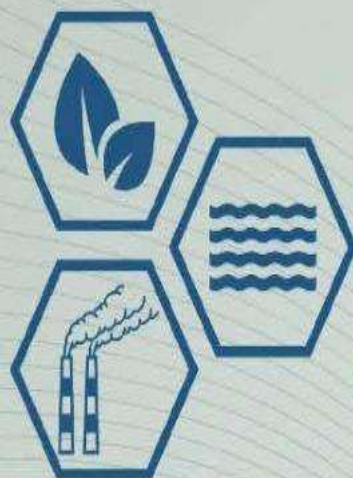
Nickel Risk to Human Health: Latest Expert Science Assessment Will Drive Future Restrictions | U.S. Centers for Disease Control

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**



Now removed
from ATSDR –
May 2025

Toxicological Profile for Nickel

October 2024

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

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Science Advisory Board (SAB)

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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



50 ppb



100 ppb



* 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

PFAS

DRAFT — FOR DISCUSSION PURPOSES ONLY

Draft Preamble Text — Proposed PFAS Effluent Guidelines for the Chromium Electroplating and Metal Finishing Sector

The Policy Group (TPG)
For Discussion Purposes

INITIAL DRAFT

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)

Priority: Other Significant

RIN Status: Previously published in the Unified Agenda

Agenda Stage of Rulemaking: Long-Term Actions

Major: Undetermined

Unfunded Mandates: Undetermined

EO 14192 Designation: Regulatory

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

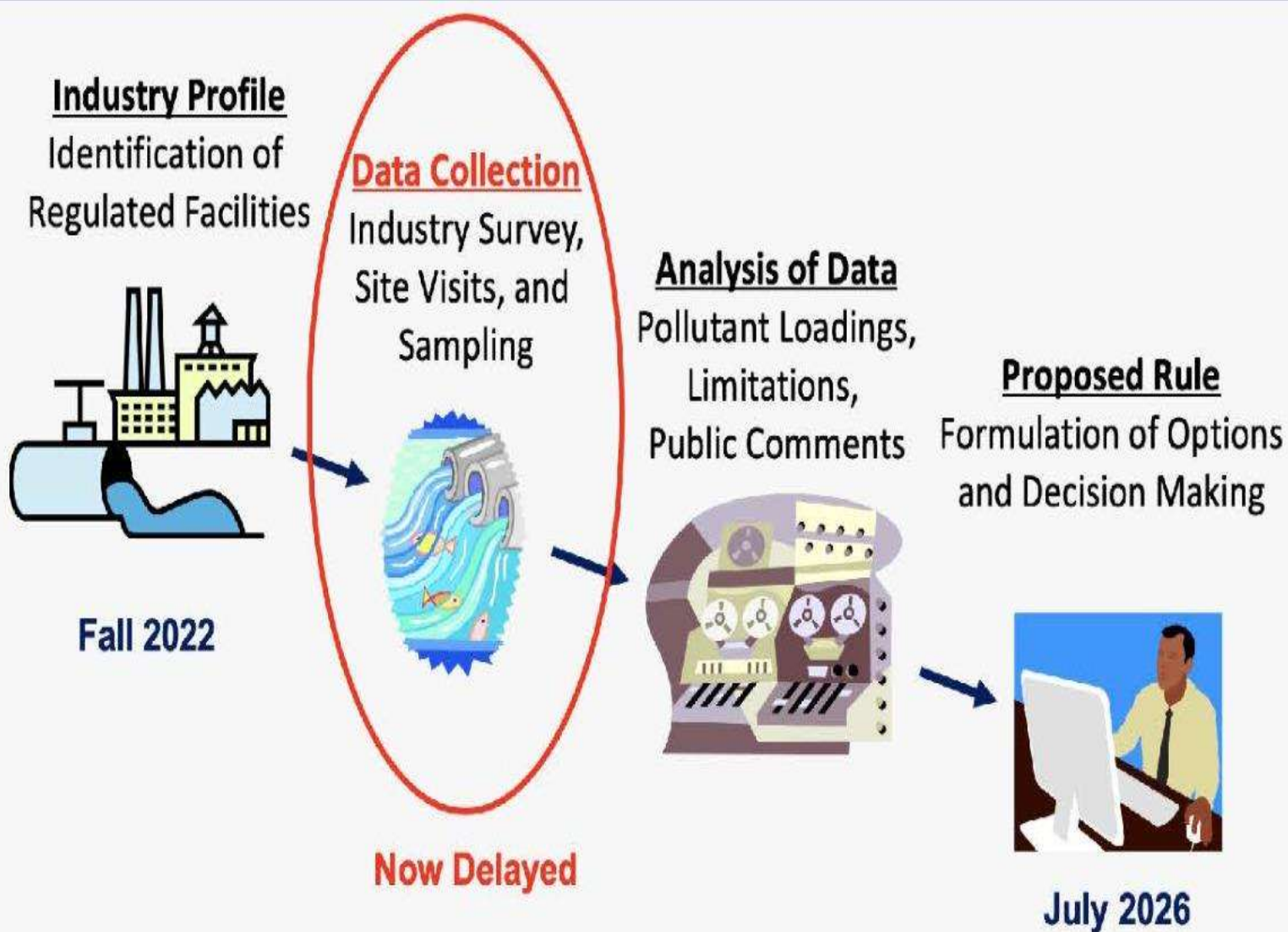
Included in the Regulatory Plan: No

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

RIN Data Printed in the FR: No

Schedule: Metal Finishing PFAS Rulemaking

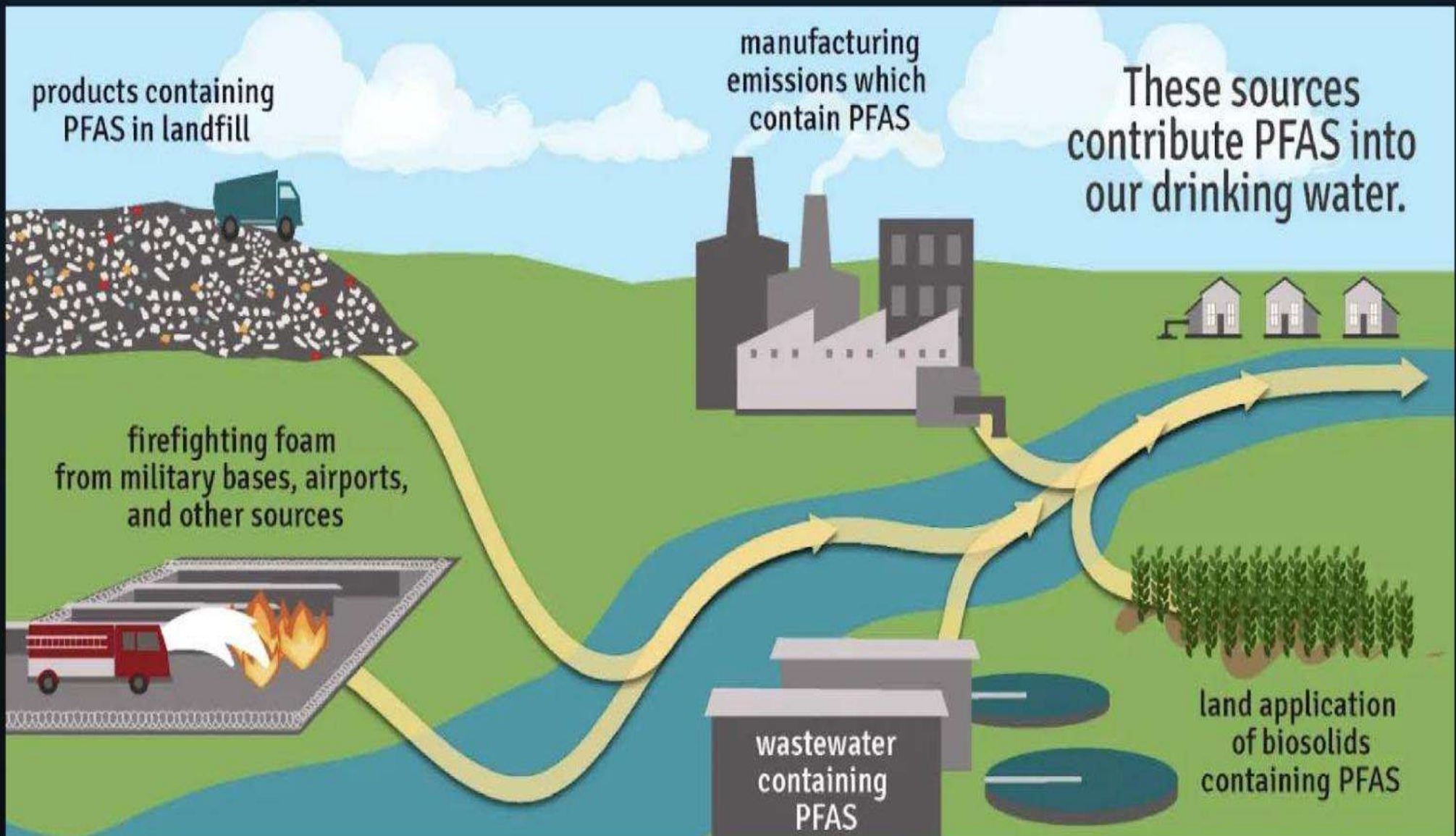
Pending Plans for Facility Sampling & Data Collection from EPA



“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 |



Final PFAS CERCLA Rule Enacted

**Strengthening Protections for Public
Health and the Environment**

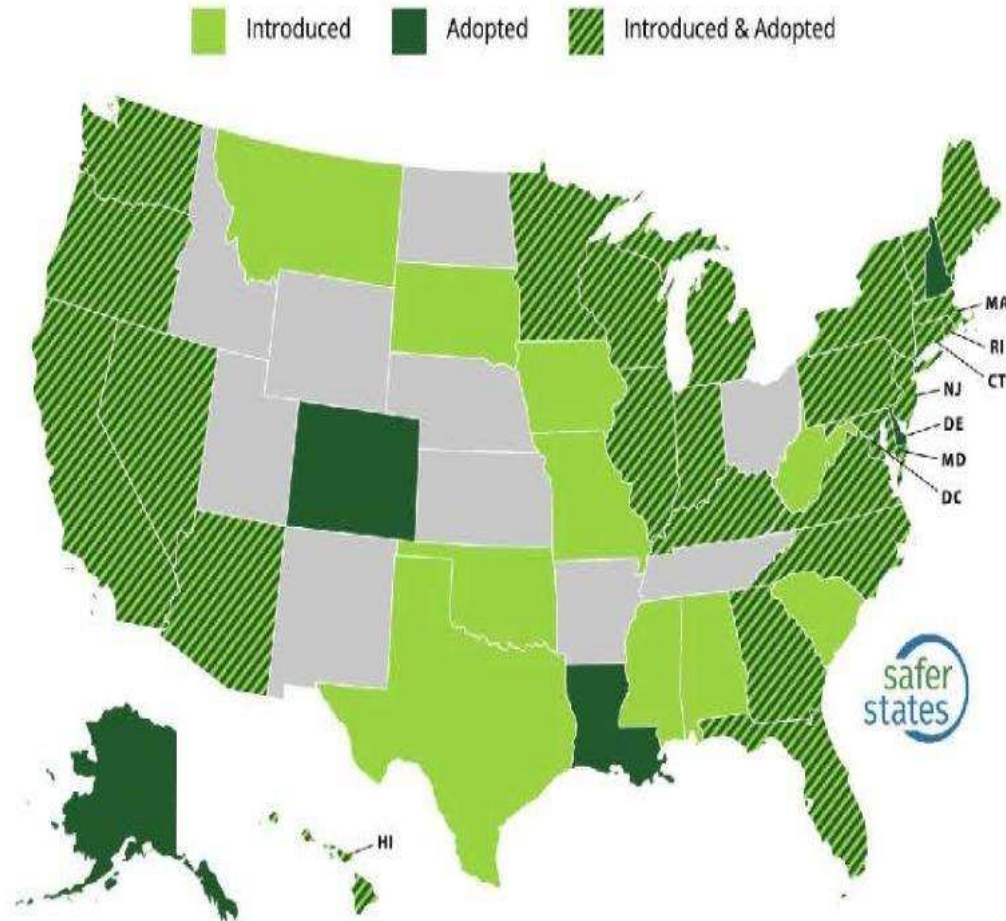
Pending: Biden-Era PFAS Drinking Water Rule

Major Opposition and Litigation



**Zeldin's EPA Weakens
Biden-Era PFAS Rules
Despite Upholding
Core Standards**

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



Policies Targeting PFAS

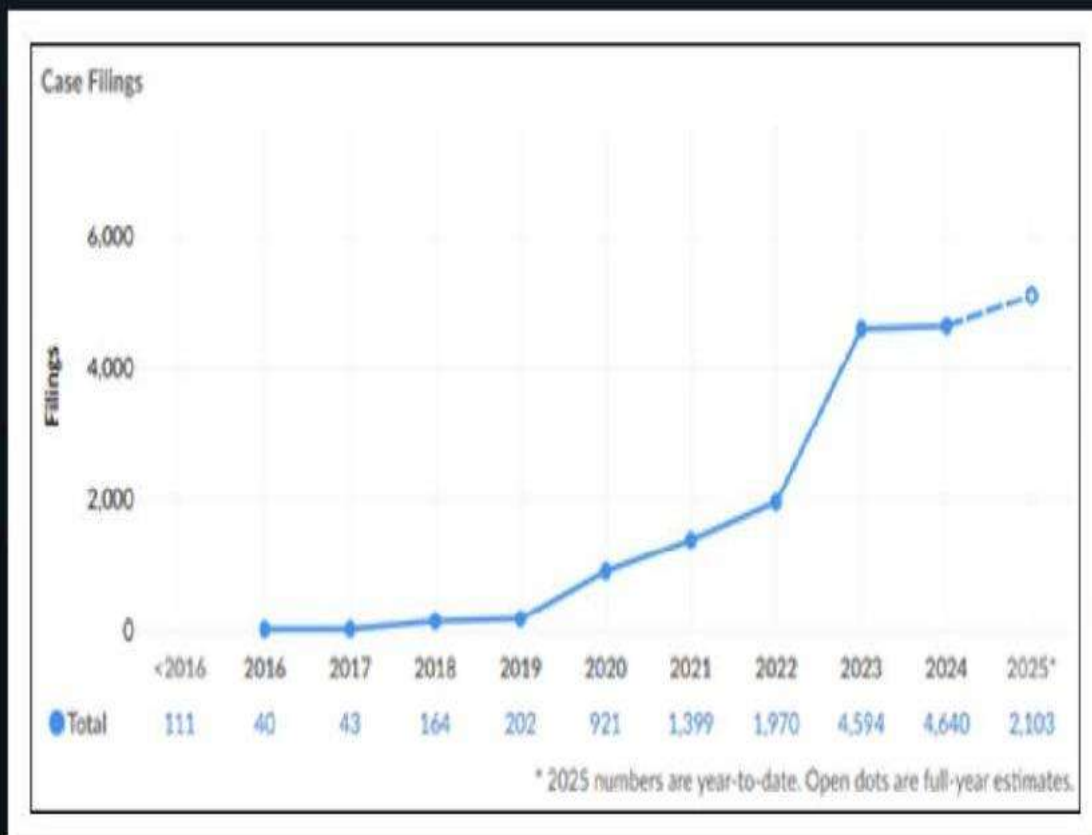
- 30 states have adopted 175 policies
- 35 states have proposed 220 policies
- More activity expected ahead

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



UNITED STATES DISTRICT COURT

District of South Carolina

Aqueous Film-Forming Foams (AFFF) Products Liability Litigation

MDL No. 2873

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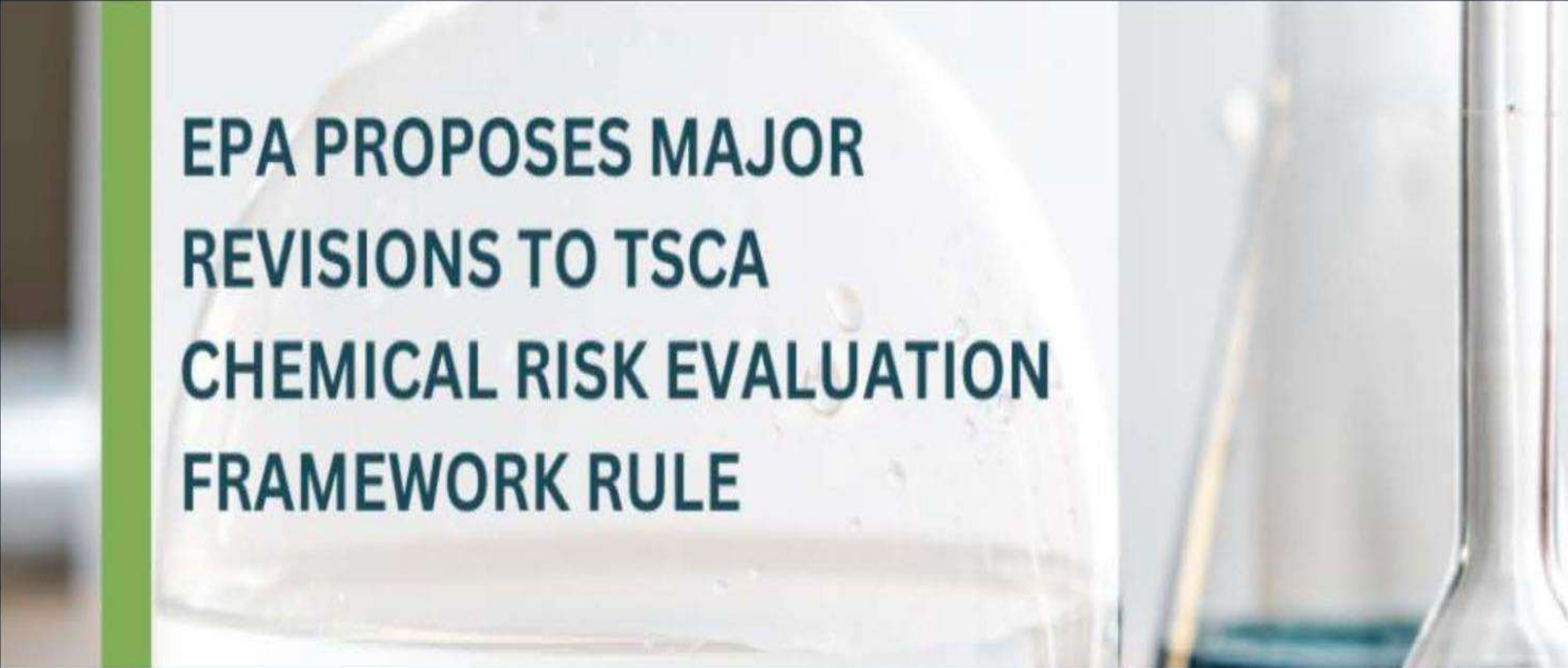
Contact Information

- ♦ U.S. District Court Staff
- ♦ Plaintiffs' Co-Lead Counsel
- ♦ Plaintiffs' Liaison Counsel
- ♦ Plaintiffs' Executive Committee
- ♦ Plaintiffs' Advisory Counsel
- ♦ Defendants' Co-Lead Counsel
- ♦ Defendants' Co-Liaison Counsel
- ♦ Defendants' Coordination Committee

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



**EPA PROPOSES MAJOR
REVISIONS TO TSCA
CHEMICAL RISK EVALUATION
FRAMEWORK RULE**

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



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

PERCENT CHANGE IN FUNDING, BY DEPARTMENT AND MAJOR AGENCY

FY2026 COMPARED TO FY2025



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



Prevent Heat Illness at Work

Outdoor and **indoor** heat exposure
can be dangerous.



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

Monday, June 16, 2025

9:30 AM ET

Organization/Group/Individual

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

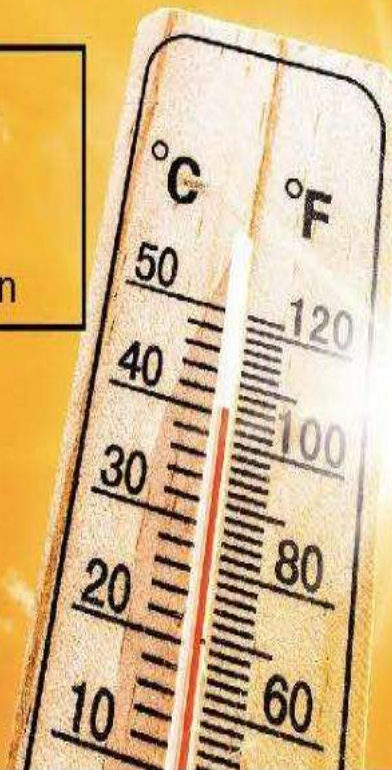


What Might Industry Want for a New OSHA Heat Standard

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



Donald P. Gallo
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Email: Don.Gallo@dgallolaw.com