



Advocacy Alert: Foundries Save Millions of Dollars Thanks to AFS Advocacy on Sweepers

THE ISSUE

OSHA's 2016 crystalline silica rule required America's metalcasters to spend an average of more than \$1 million per foundry on compliance – and in some cases, much larger amounts. There were numerous provisions in the final rule that were vague and undefined, creating massive uncertainty in this \$44 billion industry that directly employs more than 160,000 persons. These poorly defined regulatory requirements posed major problems for foundries as they attempted to simultaneously comply with the rule and operate their businesses.

AFS ADVOCACY

When the rule was issued, AFS and the National Association of Manufacturers filed a lawsuit, challenging the rule's legality. The U.S. Court of Appeals for the D.C. Circuit ultimately upheld the regulation. However, AFS's work was just beginning. AFS entered into extensive consultative discussions with OSHA representatives which led to the agency's publication of an advisory document that answered dozens of questions about the rule's requirements.

Additionally, AFS invested in research into the effectiveness of existing non-HEPA sweepers. These research results were analyzed and submitted to the agency for consideration.

THE POSITIVE OUTCOME

Based in large part on the AFS-funded research, OSHA concluded that existing non-HEPA sweepers are effective in meeting the requirements of the new rule. At an average cost of \$30,000 per new sweeper, this AFS advocacy achievement saved the foundry industry millions of dollars, helping foundries remain competitive as they made major compliance expenditures.

Concurrently, AFS held a number of workshops and Members-Only Webinars providing expert advice on compliance. Because every foundry is different in terms of size, air flow and layout, the Society also published a guide for small foundries that addressed many of the concerns that smaller foundries had in determining the best plans for achieving full compliance in a cost-effective manner.

AFS thanks its Corporate Members whose dues investments are the major funding source for AFS research and advocacy efforts.