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Revised Ambient Air Monitoring Quality Assurance Requirements

ABSTRACT

The revised air monitoring quality assurance requirements are EPA's first comprehensive changes to the air monitoring rules since 2006. These changes formalize many changes that had been informally adopted by Agency memorandum and guidance documents. Many of the changes were driven by improved monitoring technology—such as continuous particulate matter analyzers—that were not commonly available at the time of the previous update.

The revised rules also revert to the pre-2006 structure whereby state and federal monitoring program requirements are set out in Appendix A, with industrial PSD monitoring requirements specified in Appendix B. EPA provides a summary of the changes at the following URL:

https://www3.epa.gov/ttnamti1/files/ambient/pm25/Summary_of_Appendix_A_Changes_%203_25_2016.pdf.

ARTICLE

Key Changes

The revised regulation once again separates the quality assurance requirements applicable to state and federal monitoring programs from those for industrial PSD monitoring. This change recognizes the many differences in the objectives and implementation approach between the state and industrial monitoring programs. Other significant items include:

- Increased emphasis on the role and responsibilities of the Primary Quality Assurance Organization (PQAO)
- Requirement that EPA be provided a courtesy copy of an organization's Quality Assurance Project Plan (QAPP), even if that PQAO has been delegated QAPP review authority by EPA.
- Clarification of the applicable system and performance audits and required frequency for each type of monitoring program
- Updated calibration and audit ranges for gaseous analyzers

Impacts On Existing Monitoring Monitoring Programs



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- PG 4 Company Profile: Elk River Fall Protection
- PG 8 Multi-Purpose Abrasive Nylon Brush Becomes Staple in Machine Shops
- PG 18 Company Profile: RegScan One Global Regulatory Software
- PG 20 The Hearing Loss Prevention Trifecta
- PG 26 W.L. Gore & Associates Introduces Gore FR Apparel
- PG 27 New Draw Bar Cover from Rockford Systems Prevents Injuries to Vertical Mill Operators, Helps in OSHA Compliance
- PG 28 Ad Index



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Safety Zone Magazine™ is published six times a year on a bi-monthly basis by CJS Media, 951 1st Ave. W. Alabaster, AL 35007 USA. *Safety Zone Magazine*™ is distributed free to qualified subscribers. Non-qualified subscription rates are \$57.00 per year in the U.S. and Canada and \$84.00 per year for foreign subscribers (surface mail). U.S. Postage paid at Birmingham, Alabama and additional mailing offices.

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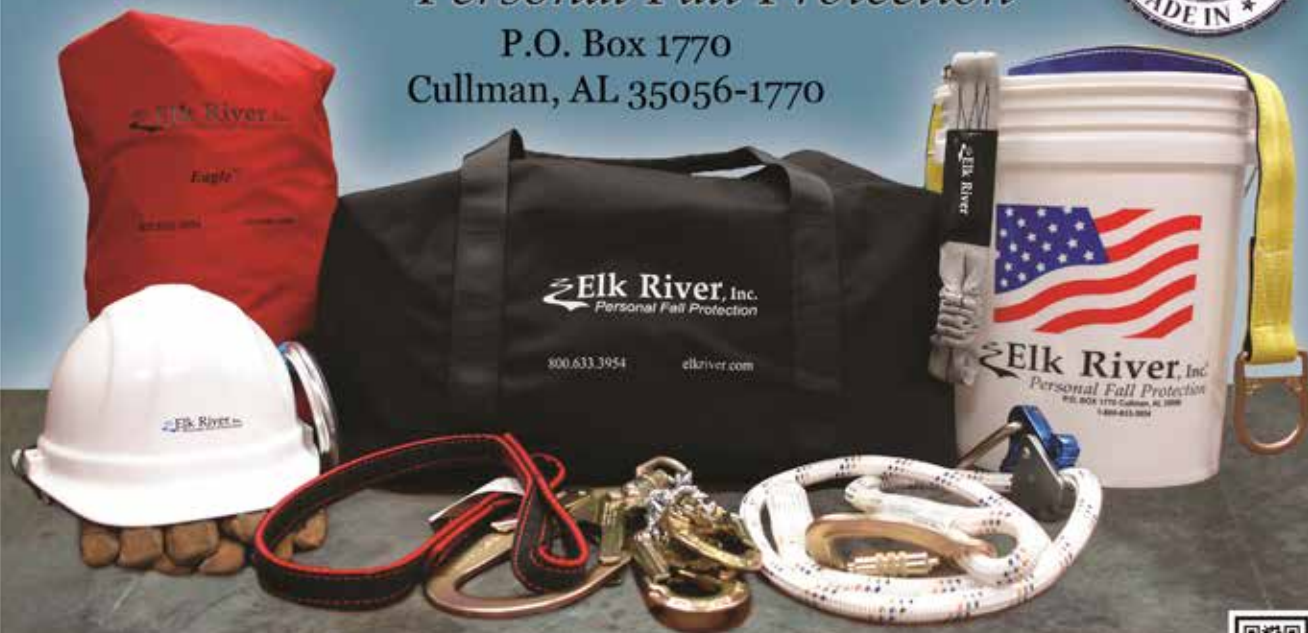


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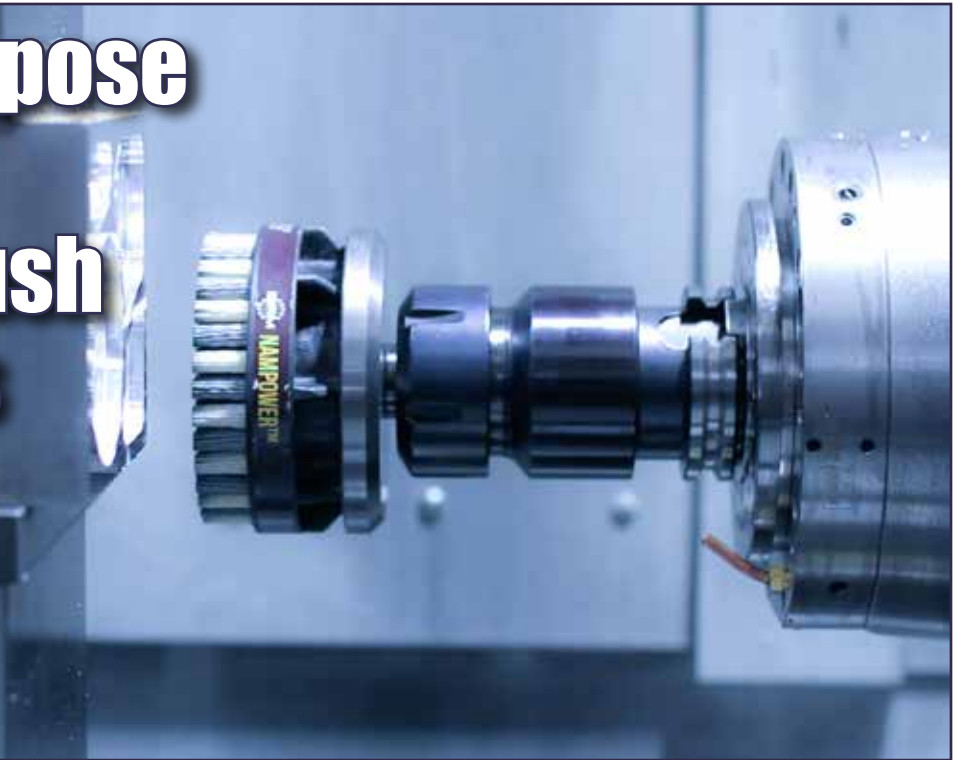
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Multi-Purpose Abrasive Nylon Brush Becomes Staple in Machine Shops



Abrasive nylon brushes prove to be flexible and useful finishing tools for deburring, edge breaking, surface finishing and corrosion removal on metal and alloy workpieces

In contract manufacturing, removing excess material that remains on a metal part after fabrication is an important finishing step. Despite utilizing increasingly sophisticated machining centers, however, much of the secondary finishing work is still performed by hand using oscillating tools, grinders, files, abrasive hand pads and wire brushes.

This labor-intensive approach only serves to drive up costs – for both the shop and, ultimately, the customer – while yielding inconsistent results. For those parts that do not meet the specifications, reworking may also be required.

As a result, contract manufacturers are turning to new finishing tools that can be easily integrated into automated machinery, CNC machines, transfer lines or robotic cells in an effort to reign

in costs and achieve more consistent results.

These new options include abrasive nylon brushes that can be used for a variety of finishing operations including deburring, edge breaking, surface finishing and even light corrosion removal. In some cases, these multi-purpose tools can also eliminate machining operations traditionally performed by chamfer tools and face mills.

“We have implemented abrasive brushes on every CNC machine we have, which includes our live tool lathes,” says Eric Sun, Founder of Orange Vise Company.

In addition to manufacturing CNC machine vises and quick change fixturing components, Orange Vise also performs a significant amount

of contract manufacturing. The disc brushes he utilizes are from the NamPower line developed by Brush Research Manufacturing.

Composed of flexible abrasive nylon filaments bonded to a fiber reinforced thermoplastic base, the abrasive disc brushes contain a unique combination of both ceramic and silicon carbide abrasive.

The abrasive filaments work like flexible files, conforming to part contours, wiping and filing across part edges and surfaces of non-ferrous, cast iron, mild steel and ductile iron, stainless and alloy steels, titanium and high nickel alloys.

“For us, there really isn’t another solution, because the alternative is to have a worker use a file or a handheld abrasive pad, and the part is not going to have the finish you get with the



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abrasive nylon brushes,” says Sun.

Edge Finishing, Often Without Chamfer Tools

Finishing sharp edges between two faces of a part, as well as deburring bits of metal or imperfections caused by the cutting action of the tools, can be accomplished with a variety of techniques.

Hand finishing is an option, as are options such as tumbling. Chamfering tools are also frequently used to provide a transitional edge at 90 degree angles, as well as for deburring. For some contract manufacturers, however, eliminating the chamfering step can prove valuable.

“I run the abrasive nylon brushes over any fairly flat part I have going in the

mill,” says Ken Spaulding of Zodiac Engineering, a contract manufacturer in California with a background in aerospace parts as well as mold making. “I don’t want to use a chamfer tool for edge breaking or deburring if it’s not necessary.”

The majority of the machining work Spaulding currently focuses on includes pocket knives as well as cycling components for BMX, road and mountain bikes. Spaulding sells products of his own design, along with contract manufacturing.

Spaulding uses the NamPower abrasive discs on his CNC and manual milling equipment for light deburring as well as surface finishing of various types of metals and alloys. For the pocketknives, this includes stainless steel for the blades and titanium and zirconium for the frames and handles; and 6061 aluminum for the bike stems and 7000 series aluminum for the sprockets.

“With the brushes, I get a very predictable and consistent edge break and surface finish,” says Spaulding. “I can do it inline and it is a lot more predictable and reliable than breaking edges by hand.”

For the cycle sprockets he produces, for example, Spaulding runs the brushes over the teeth in a single pass on each side of the part.

“The brushes deburr pretty much every side of the tooth, so I don’t have to run a chamfer tool around the edges. Also, tumbling doesn’t really get inside the teeth, like the brush does,” explains Spaulding.

Even when chamfer tools are specified, the edges may still require deburring.

“Chamfering tools are just half of the

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potential use for the abrasive nylon brush. Although most manufacturers specify the degree of edge finishing, there can be gray areas where a customer may not want a sharp 90 degree edge but does not specify chamfering.

In cases like this, Orange Vise may slightly round off the edges and corners with an abrasive nylon brush. The rounding can be minimal, if necessary, so it is not visible to the naked eye.

puzzle,” says Sun of Orange Vise. “The other half is some sort of abrasive method, such as tumbling. However, tumbling can be impractical for larger parts or anything that needs to remain dimensionally unaffected.” Instead, Sun finds abrasive nylon brushes “complementary” to 45 degree chamfering tools. This extends to chamfered holes.

“Often chamfers leave burrs on the top and the inside edges of drilled holes, so we use the NamPower brushes because they are flexible enough to remove any burrs from the top edge, while going into the hole enough to deburr the lower edge,” says Sun.

Minor edge breaking is another

Surface Finishing Without Face Milling

In addition to edge finishing, the abrasive nylon brush has application for surface finishing. In some cases, this can replace the use more aggressive face mills, flycutters or grinders.

Sun describes the finish as “almost like

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a milled finish, with a consistent swirl pattern in one direction.”

“The surface finish was good enough that we were actually blending it with our ground finishes on our vices,” says Sun. “With large surfaces that required multiple passes, there were no visible blends. The whole thing looked like it was done in one pass.”

He adds that there are times when a workpiece or even a machine does not lend itself well to using a large face mill, creating the need for multiples passes to accomplish the task.

“You can use a brush to create a cosmetic 6” pattern even if the machine can’t

handle a similarly sized face mill,” says Sun.

Corrosion Removal

Another potential use for the tools is light corrosion removal, often without affecting specified tolerances.

“With only a few passes a 120 or 180-grit brush, you can remove a significant amount of rust without affecting the dimensions of the workpiece,” says Sun. “On steel, for example, it is unlikely to create a measurable difference.”

“The pattern will be nice and even as opposed to if you use a handheld abrasive hand pad where the patterns may run in random directions,” says Sun.

Sun cautions that aluminum is more susceptible to dimensional changes when using abrasives, so a finer grit brush may be required. However, the removal of



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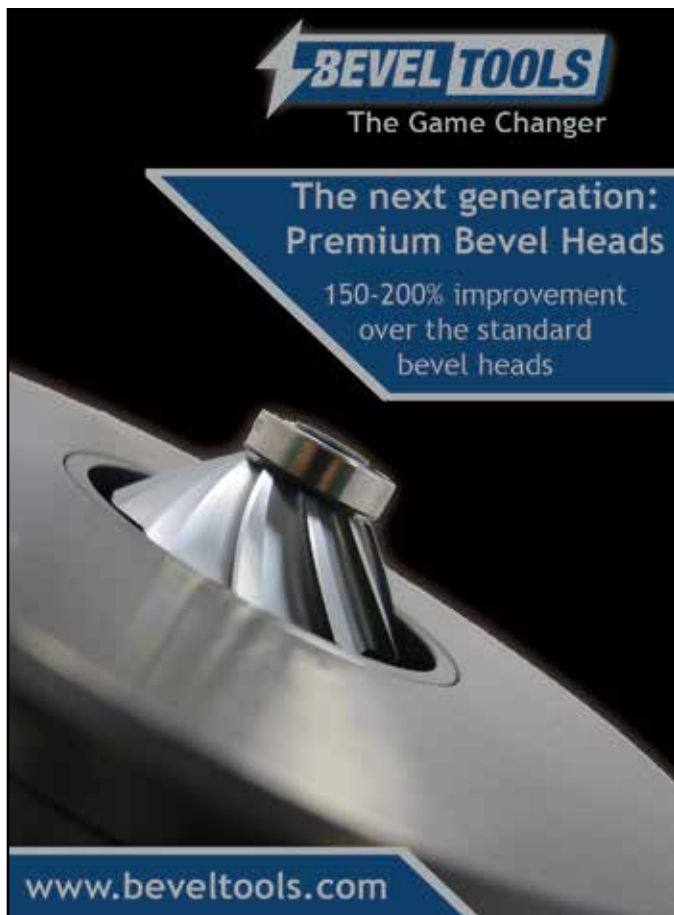


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material is minimal – measured in ten thousandths of an inch – so if the tolerances are within a fairly typical 2-3 thousandths of an inch, it would not be an issue.

Tool Configurations

According to Spaulding of Zodiac Engineering, the brushes are available in a variety of options including two fill configurations: the Dot Style, for general purpose deburring and surface finishing and the Turbine Style, which has a higher density fill for more aggressively deburring.

Sizes include 100mm, 125mm and 150mm diameters at trim lengths 18mm or 38mm. Available grits include 80, 120, 180 and 320.

“With the different grits, diameters, and trim lengths, the abrasive nylon brushes are extremely versatile as long as you have a few different sizes and styles,” says Spaulding.

For more information, contact Brush Research Manufacturing, Brush Research Mfg. Co., Inc., 4642 Floral Drive, Los Angeles, CA 90022; Phone: (323) 261-2193; Fax: (323) 268-6587; email: info@brushresearch.com.

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Tutorials

RegScan also produces a number of helpful videos for our users. They answer most commonly asked questions on using the RegScan One interface. You may wish to visit our Informational & Tutorial Videos Page prior to submitting a ticket to see if your question can be answered with the assistance of one of these videos.

Conference

And now RegScan has gone beyond the computer screen to bring partners and clients their first ever Inaugural Regulatory Conference. Government officials, regulatory experts and executives from Fortune 1000 companies will gather on Capitol Hill in Washington D.C. on May 24th-25th, and be among the first to learn what the Environmental Protection Agency has planned for 2017 and beyond. And with RegScan, sometimes it is all fun and games. We're taking everyone out to the ballgame with box seats for the Washington Nationals as they host the National League Champion New York Mets.

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By Del Williams

*Del Williams is a
technical writer based in
Torrance, California.*

The Hearing Loss Prevention Trifecta:

Fit, Comfort, & Communication While Wearing

At least four million workers go to work each day in damaging noise, ten million people in the U.S. have a noise-related hearing loss, and twenty-two million workers are exposed to potentially damaging noise each year, according to the Centers for Disease Control and Prevention (CDC).

Occupational hearing loss is the most commonly recorded occupational illness in manufacturing accounting for 1 in 9 recordable illnesses, states the Bureau of Labor Statistics, as cited in a 2010 CDC National Institute for Occupational Safety and Health (NIOSH) document. Although a traumatic noise exposure may cause an immediate hearing loss in some cases, most occupational hearing losses occur so gradually that workers are unaware they are losing their hearing, adds the document. With continued exposure, the hearing loss spreads into those frequencies most needed to understand speech.

In many workplaces, disposable foam earplugs are traditionally used to block noise. However, their effectiveness depends not only on proper fit, and the matching of the protector to their particular ear but also on compliance – that is, whether workers wear them consistently and correctly place them in their ears.

“Most people wear disposable foam earplugs incorrectly, which limits their effectiveness,” says John Franks, PhD, a former NIOSH Hearing Loss Prevention Section Chief. “Each foam earplug is supposed to be rolled tightly, put deep in your ear canal, then held in place with your index finger until it fully expands and you can just see the outer edge. Instead, most people leave them hanging out of their ears.”

Another challenge occurs when workers must talk in person or via two-way radio in high-noise work environments. To hear and communicate, they remove their earplugs, which exposes them to damaging noise for the duration of the conversation. Such cumulative exposure to harmful workplace noise is a leading cause of hearing loss.

“People commonly remove earplugs to carry on a conversation,” says Franks. “But if they remove them 20% of the time, they have reduced their effectiveness by half.”

Essentially what is required to optimally protect workers is a hearing loss prevention trifecta: a device that delivers the proper fit, maximum comfort, and the ability to communicate verbally or over radios without having to remove it.

To tackle the severe occupational hearing loss problem, it is helpful to consider the ideal solution, which requires allowing for all three factors.

First, an ideal hearing protection device would be customized to meet the needs of every employee or worker on the floor. That means fitting all ears regardless of differences in size, shape, or depth. Like snowflakes, no two ears are the same – and they continue to grow throughout a person's lifetime – so there is no such thing as one-size-fits-all when it comes to hearing protection. With better fit and comfort, workers would wear the devices more compliantly.

Second, the hearing loss prevention device would prevent high-noise sounds from entering the ear at levels that could cause instant damage or damage over time.

"NIOSH recommends reducing worker noise exposure to 85 dB for eight hours, but this can still leave 12-15% with hearing loss over their work lives," says Franks.

Third, the device would prevent high-noise exposure without limiting communication, and could be worn all day. In this way, the worker could simply wear it the entire workday, which would eliminate the hearing damage that occurs when typical earplugs are removed in high-decibel work settings to communicate.

Fortunately, a new generation of occupational hearing protection has been designed with the trifecta of custom fit, comfort and ability to communicate while wearing.

Custom Fit

Unlike one-size-fits-most disposable earplugs, some cost-effective hearing protectors are fitted to the individual worker so every worker receives the same high level of hearing protection.

"If you make custom hearing protection available for everyone and ensure people know how to use it, studies have shown it can reduce occupational hearing loss to near zero in industry," says Franks.

Such custom hearing protection can be rendered quickly and cost-efficiently in an industrial setting.



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For instance, Custom Protect Ear (www.protectear.com), the largest personalized industrial hearing protector manufacturer in North America, custom molds hearing protection, such as its dB Blockers product line, to each worker's ear. The company's representatives go to the plant to take impressions of each worker's ear canal and outer ear in a process that usually takes about ten minutes per worker.

The custom impression is sent to the lab for processing where the device, which is an exact replica of the wearer's ear canal and outer ear, is manufactured. This ensures the device seals the ear both in the canal and around the ear, preventing damaging noise from entering while eliminating ear pressure. The company is increasing such precision by scanning the ear impression and is moving into 3D printing of the casting for even closer fit. Company representatives then return to the plant to train workers on how to ensure proper fit and fix any that do not fit perfectly.

"A custom hearing protector fit is a key part of preventing occupational hearing loss because everyone's outer ear and ear canal is unique," says Franks. "The closer the fit, the better the function and the less people take them out to relieve ear pressure or modify them as is common with disposable foam earplugs."

Comfort and Compliance

Since Custom Protect Ear's hearing protection devices are made of a medical grade silicone, they are designed to be soft and flexible. The advantage of the softer devices is better comfort and function. They change shape slightly as the wearer's ear canal changes shape when talking or chewing, thereby continuing to seal during those activities.

"While various silicone-based hearing protectors exist, it is important to use one made of medical grade silicone," says Franks. "This can help ensure that it is sufficiently supple and can prevent someone from developing an allergy to it."

Greater comfort addresses a significant problem facing health and safety managers who oversee hearing loss prevention programs: getting people to wear hearing protection products and policing their use.

Improved comfort enhances workers' ability to comply with wearing hearing protection for extended periods, and so do

certain design aspects. Since they are custom molded, they only fit the correct way like a key fits a lock so it is not necessary to check insertion. When improperly inserted, discomfort encourages workers to correct insertion. Checking for compliance is also simplified because the hearing protector's colored exterior makes it easy for safety officers to see at a glance if workers are wearing them.

Communication Without Removing Device

Since workers often need to communicate in person during their work shift, they typically remove disposable earplugs to talk. To prevent occupational hearing loss, it can be important to provide custom hearing protectors that can be worn the entire work shift without removal.

Including a filter and vent in custom ear protectors like Custom Protect Ear's can make speech more understandable by reducing attenuation at higher speech frequencies. This allows leaving them in while talking, and isn't possible with typical solid foam earplugs.

Talking by two-way radio is also common in workplace settings. But because a radio must be louder than background noise for a worker to hear it, it usually is the loudest sound source in the work setting, which must be protected against to avoid hearing loss.

To deal with this problem, Custom Protect Ear connects incoming radio audio to the outside of the hearing protector so the device's filter reduces dB volume and the worker does not have to remove the hearing protector during his or her shift. Because the proprietary filters "squeeze" high and low frequencies to block potentially harmful sound waves, communication comes through, but harmful noise does not.

For robust hearing protection both in person and via radio, the company offers a convertible hearing loss protector. This provides the convenience of a detachable cord and a filtered vent for interpersonal communication, and attaches easily to various radio cords for seamless integration with radios.

"If you're using a radio to communicate, it is better to run a tube from the radio receiver to the custom hearing protector so workers can lower radio volume and protect their hearing," says Franks.

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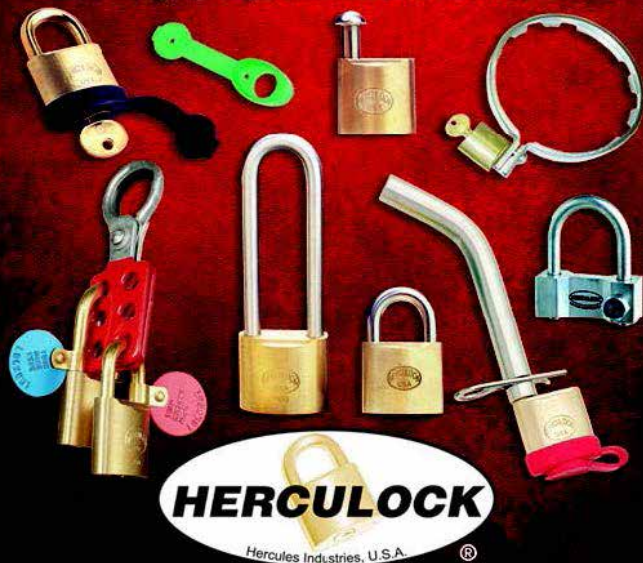


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W. L. Gore & Associates, Inc., the company that created the category of waterproof, windproof, and breathable outerwear and reset the industry watermark for comfort and protection with GORE-TEX® Fabric, is now doing the same for oil and gas industrial workers with the introduction of GORE® FR Apparel products featuring GORE-TEX® PYRAD® Fabric – the most comfortable flame-resistant (FR), foul-weather outerwear available on the market.



GORE® FR Apparel is a new line of FR foul weather outerwear products designed to meet the demanding needs of oil and gas workers. A jacket, bib, and detachable hood combination offers protection from incidental flame exposure and weather protection across a wide range of environmental conditions, while offering moisture management to improve comfort and safety. The durable, lightweight 2-layer ePTFE membrane construction also helps protect workers from exposure to hot liquids, steam common oilfield contaminants, and allows for easy care and cleaning.

Leveraging the same platform as GORE-TEX® Fabric and utilizing Gore's proprietary PYRAD® Fabric Technology, GORE® FR Apparel complies to ASTM F2733-09 and ASTM F1891-12 and adds retro-reflective properties that meet or exceed ANSI/ISEA 107-15 Class O, Type 1 and CSA Z96-15, Class 1, Level 2 offering HSE managers the confidence they need when selecting FR outerwear for their employees.

"Simply put, GORE® FR Apparel is a best-in-class line of foul-weather outerwear products that will deliver an unprecedented performance-to-value solution for our customers in the oil and gas markets," said Sean McDearmon, Market Development Champion for Gore. "A new performance benchmark has been established." For more information visit our website at www.goreprotectivefabrics.com/utilities or call 800.431.GORE (4673).

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New Draw Bar Cover from Rockford Systems Prevents Injuries to Vertical Mill Operators, Helps in OSHA Compliance

Vertical mills are essential cutting tools in machine shops used to remove material from the surface of metal workpieces. However, these tools present serious danger when an operator comes into contact with their high-speed rotating draw bars, resulting in injuries and costly OSHA fines.

To bring needed safety to the shop floor, Rockford Systems, LLC., a premier provider of machine safeguarding products and services, has launched a new Milling Machine Draw Bar Cover (part #DBC001) to protect vertical mill workers from rotating shafts seven (7) feet or less from the floor or working platform. It guards the turning draw bar with a non-rotating, smooth, welded-steel enclosure, secured firmly to the mill with a powerful ring magnet and safety anchor chain. Simple to install, the draw bar cover prevents clothing, hair or hands from being grabbed by the moving shaft.

According to Jason Swisher, Rockford Systems Production Manager, "Our new Draw Bar Cover features high-quality construction with smoothed welding seams and finished edges, designed to protect mill workers from hazardous rotating drawbars. It was engineered with input from machine makers and operators to ensure that it gets the job done right."

This product can be used on any vertical mill that has up to a 7" extrusion. It compliments the full line of Rockford Systems milling machine guards, shields and controls that protect thousands of workers everyday around the world.

OSHA COMPLIANCE

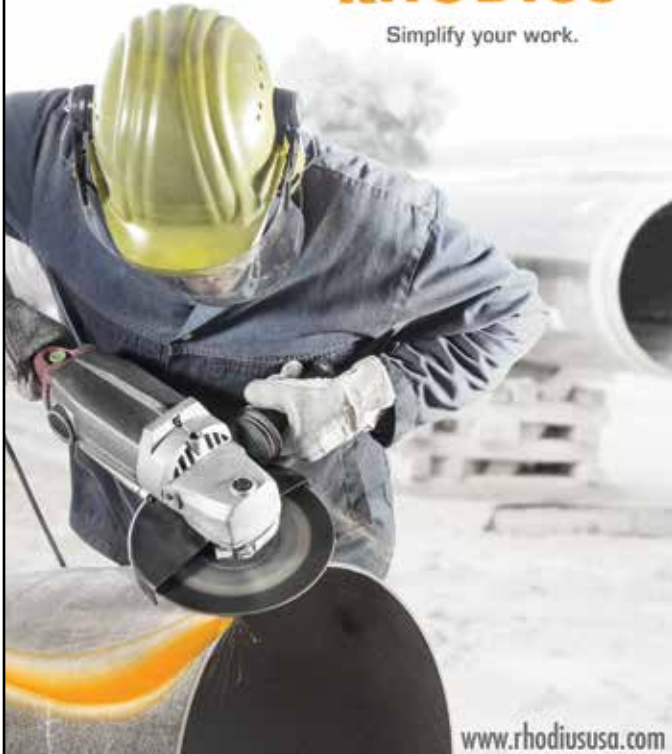
Installation of the Draw Bar Cover helps machine shops comply with the OSHA 1910.219(c)(4)(i) safety standard that states: "Projecting shaft ends shall present a smooth edge and end and shall not project more than one-half the diameter of the shaft unless guarded by non-rotating caps or safety sleeves."

Lack of machine guarding or improperly installed safeguarding equipment was one of the top ten most cited OSHA violations in 2015, resulting in millions of dollars in fines levied against businesses. Injuries, as a result of improperly safeguarded machines, also lead to higher insurance costs, lawsuits, and hospital expenses. Although safety equipment and proper machine controls are required by OSHA, many manufacturers sell machinery without either, leaving the business with the responsibility of safeguarding the machine.

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