



Missouri NEWS

Auto & Truck Recyclers

Serving the Membership of the Missouri Auto & Truck Recycler Association

June/July 2011

Things to Consider for Operational Excellence in the Recycling Industry

By Ted Margison, President, Pebble, LLC

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Better Visibility Provides Better Control

A supplier of protective gear was struggling to meet demands. "We have tried everything over the past couple of years but nothing works. Our turns are less than 1 and we still can't fill demand. We've been selling size 10 and 11 boots the last couple of years and now a customer needs size 13. No matter what we stock it doesn't seem to be the right thing; it's like a guessing game."

While I was in the General Manager's office he received a very angry call from the CEO of a very large customer. Without proper protective gear workers could not work - the downtime on one of their lines cost them about \$100,000 per day.

Obviously, the current decision-making processes were not effective; something was missing. We mapped the decision-making processes to find the 'blind spots'. These are decision points that are not fully understood or assumptions have been made about them. The blind spots in this case were the decision-making processes of customers. In particular, what drives demand.

We interviewed the top 20 customers and found that demand was driven by two things: replacement of worn-out items and new hires. For replacement we realized that we could predict product life-expectancy based on job position and work environment characteristics. We proposed to the customers that we would gather and consolidate data across customers on job positions and work environment characteristics to predict life-expectancy and then automatically reach out to replace the items. For example, if a product had a life-expectancy of 36 months for workers in a particular department, we would do an inspection at 30 months and replace the item before it wore out. 'New hire' demand was primarily 'large scale' - new plants being opened, new mining projects. We identified a simple way of

Things to Consider continued on page 5...

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From the President

By Dan Richardson

MATR Members,

Recyclers are facing a number of challenges today just to stay in business. Environmental regulations, federal record keeping, licensing requirements, as well as, economic pressures are just a few of the hurdles we must navigate each day. Cars are getting harder to buy and more expensive to purchase. Competition from other countries offers

a new and enhanced challenge. As we move through this maze together as an association, we can help each other by sharing ideas and solutions. This is exactly what association membership is about.

Thanks for being a member.

Dan Richardson

MATR Legislative Update

By Brian Bernskoetter, MATR Lobbyist

The Missouri Legislative Session drew to a close on Friday May 13th with a last minute flurry of legislative activity that all ultimately failed to pass. It is this kind of chaotic process that created the popular quote "If you like politics or sausage – don't watch how they are made".

The session began with the familiar refrain that the budget would be the greatest struggle that many legislators have dealt with and hoped to never experience again. The state budget has gone through a small decline the last few years because of the overall lack of growth in the economy and this year's budget was the first major budget shortfall without significant aid coming from the federal government. Estimates at the beginning of the year predicted about a \$500 million dollar shortfall.

The General Assembly did eventually pass a \$23.2 billion state budget for fiscal year 2012 which is comparable to last year's budget if the gubernatorial withholds are factored into the figures. The budgeting process was aided slightly through the first part of the year by the steady, albeit small, increase in tax revenues in Missouri.

There have been a few bills of specific interest to the automotive recycling industry. Namely, a bill was filed that would have required scrap metal dealers purchasing catalytic converters or to keep a register containing a written or electronic record of each purchase for two years and that no one except motor vehicle dealers could purchase more than one a day. After discussion with the sponsor and House leadership we were able to kill this bill.

Another bill that MATR worked on this session had to do with scrap tire sales. Tires owned by public entities like the state or cities were prohibited from processing those tires in state by a tire shredder. At the request of MATR and other interested groups an amendment was added that allowed permitted facilities to take these tires and burn them for energy. The nuance is that if our recycling facilities got some state or municipal scrap tires they would have had to separate them from other tires in order to resell them to permitted facilities but the amendment avoided this potential problem. This provision passed in a couple of bills and awaits the governor's signature.

Things to Consider continued from cover...

inserting ourselves in the hiring process to identify the best-fit product based on job position and work environment characteristics.

The customers were so excited about the recommendations that five of them offered, each, to pay half the cost of any system effort. Some offered the opportunity to bid on business that was going to competitors, while others simply switched their business from a competitor. As one customer said "We no longer have to worry about these decisions – you are making them for us. The cost of these products is far less than the cost of downtime; why would we talk to anyone else."

Another company was about to make a strategic decision that would have serious operational impact. "We need to move to same-day shipping to get a competitive edge. Our customers buy when something breaks so we have to be able to respond quickly", said the Sales Manager. The company had recently moved from 5-day turnaround on orders to 2 days and inventory had climbed to the point where turns hovered around 1.2. Moving to same-day shipping was going to be a major challenge.

In order to better understand the buying process for customers we interviewed the top 20 customers. Surprise: All could give at least three months notice on demand; one could give 12 months.

"Why do you give us only 2 days notice", the CEO asked. "Because that's the lead time you gave Purchasing."

We found some quick and easy ways to get this advance notice and in just a couple of months we were buying 'to-order' for these customers. We also approached suppliers offering the advance notice. The VP Operations for the largest supplier (a company whose typical customer was 40 times our size) said "If you give us this advance notice you can order anything you want up to end of the day on Friday and it will be on the truck Monday morning."

In less than a year inventory turns reached 7.3. Shortly afterward, the company went on to acquire a larger company.

To get better visibility you need to go beyond your operations to include customers, business partners, suppliers and other external organizations. Start with processes that are key to achieving your

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business goals. Map your current processes (goes as far upstream and downstream as possible):

- Identify decision points
- Find the 'blind spots' for decision-making
 - Who makes the decisions
 - What drives their decision-making
 - Triggers
 - What are they measured on (what's a win for them)
 - Are they 'driven' by others in their org (interview those people)

Accountability

For internal operations this is probably the single biggest problem for companies. Almost every company feels they have a good handle on accountability – unfortunately, they are usually wrong. When things aren't performing effectively it's usually because no one is accountable for the performance.

A manufacturing company was looking at getting a new ERP system. The CEO had heard horror stories from various customers and was concerned about implementation.

"What kinds of things go wrong during an implementation?" asked the CEO.

"Well, a major problem in many companies is that accountability is not well defined."

"Oh, that's not a problem here. We're a very lean organization and everyone understands what they're accountable for," replied the CEO. "But, just out of interest, can you give me an example?"

"Well, although it might not apply here, companies that have problems with inventory often find

that no one is responsible for inventory accuracy."

"That's not an issue for us. Dave, tell him who's accountable for inventory accuracy." said the CEO, nodding to his COO.

"No one," replied the COO. "Maybe that's why we have a \$14 million inventory discrepancy."

Effective accountability covers ownership, span of control, performance measurements and your reward/ recognition system.

If you would like additional information on hiring, please click here to get a link to an article on this subject: <http://lighthouseconsulting.org/Articles/KOTHireRight-FirstTime/signupform.php>

If you would like additional information on this topic or others, please contact Lighthouse Consulting Services LLC, 3130 Wilshire Blvd., Suite 550, Santa Monica, CA 90403, (310) 453-6556, dana@lighthouseconsulting.com & our website: www.lighthouseconsulting.com.

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*"I don't know the key to success
but the key to failure
is trying to please everybody"*

*-Bill Cosby
Day by Day*



ECAR Fact Sheet Stormwater Pollution Prevention Plan (SWPPP)

To comply with federal and state stormwater requirements, automotive recycling facilities must prepare a Stormwater Pollution Prevention Plan (SWPPP).

Before starting the SWPPP, be aware that:

- The SWPPP can be prepared by employees. A professional engineer is not required.
- The same basic information is required in more than one place in the SWPPP and, once accumulated, can be used again.
- Much of the information is based upon observation and common sense.

The major components of the SWPPP are:

- Pollution prevention team;
- Site map;
- Description of potential pollutant sources;
- Measures and controls for stormwater management; and
- Comprehensive site compliance evaluation.

Pollution Prevention Team

Appoint a team of one or more people to develop a Pollution Prevention Plan. In addition, the team is responsible for keeping the Plan current – this means modifying it whenever changes in locations, materials, processes or other activities would render the Plan invalid or inaccurate.

Site Map

The map should locate the site (street boundaries, identifying landmarks) and it should indicate topographic features of the site such as hills and ditches.

Draw or outline the site according to scale on a plain piece of paper or a section of enlarged topographic map. Make the site plan big enough to contain the required information below. Then walk the site during dry weather and locate the following on the yard area of the map:

- All buildings and driveways.
- Loading/unloading areas.
- Each stormwater outfall or drainage ditch that conveys water off-site.
- Each stormwater control measure to reduce pollutants in the runoff.
- Each outdoor activity such as dismantling, draining fluids, etc.
- Places where previous spills or leaks have occurred.
- Storage tanks for gasoline and other engine fluids.
- Vehicle storage areas.
- Parts storage, including batteries, tires and gas tanks.
- Scrap metal storage.
- Other materials or activities exposed to precipitation.
- Drainage patterns.

While walking the site, count the items and record the number, size or amount. Also note if dry weather flows are occurring (they should not be occurring), or if sludges, stains, colors or odors are present on the site. These may be indicators of a leak or other problem.

MATR Dates of Interest

<i>Governor's Deadline for Signing Bills</i>	<i>July 14, 2011</i>
<i>Effective Date of Signed Bills</i>	<i>Aug. 28, 2011</i>
<i>Veto Session Convenes</i>	<i>Sept. 14, 2011</i>
<i>ARA Convention</i>	<i>Oct. 11-15, 2011</i>
<i>MATR Annual Meeting and Convention</i>	<i>Nov. 18-20, 2011</i>

A second walk around the site during a rainfall will allow you to identify where the rainfall drains for each section of the yard. Drainage patterns must be indicated on the site map. After the storm, revisit areas where stormwater has accumulated and look for color, odor, turbidity, floating solids, suspended solids, foam, oil sheen or other obvious signs of stormwater pollution. The drainage patterns that were just observed will indicate the area where the problem originated. The source should be identified and corrected before filing the Notice of Intent. Compliance with the General Permit implies that stormwater leaving the site will not be polluted.

Description of Potential Pollutant Sources

Much of the information for this description has already been accumulated while developing the site plan. This section includes:

- Drainage and site map
- Inventory of exposed materials.

- Spills and leaks.
- Any existing sampling data.
- Risk identification and summary of potential sources.

Measures and Controls for Stormwater Management

This section of the SWPPP includes:

- Good housekeeping.
- Preventative maintenance.
- Spill prevention and response procedures.
- Inspection.
- Employee training.
- Recordkeeping.
- Non-stormwater discharges.
- Sediment and erosion control.
- Management of runoff.

Comprehensive Site Compliance Evaluation

This evaluation must be conducted periodically and not less than once per year. The evaluation may be conducted after your coverage under the General Permit begins, but must be conducted within one year. This requirement provides a mechanism for ensuring that the facility attains and remains in compliance. A description of the comprehensive site evaluation must be included in the SWPPP and should contain, at a minimum, a record of the following activities:

- Review the SWPPP, BMPs, records and site map.
- Walk the facility to verify compliance.
- Identify existing problems.
- Look for potential problems.
- Determine if BMPs are being implemented and are adequate.
- New sources of pollution should be identified and BMPs should be written.
- Revise the site map and the SWPPP if needed.
- Review monitoring results.
- Include the date and person responsible for the site evaluation.
- Record your findings. This information will be necessary for your annual report

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Associate Membership: Any entity or person not meeting the eligibility requirements for active membership as herein above provided shall upon the approval of the Membership Committee be eligible to become an Associate Member of the Association.

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ECAR Fact Sheet for Missouri Waste Tires

The following fact sheet was prepared by the ECAR Center staff. Once prepared, each ECAR Center fact sheet undergoes a review process with the applicable state environmental agency(ies). You can check on the status of the review process at <http://www.ecarcenter.org/fs.cfm?st=MO&fs=tires>. Please read the disclaimer on the status page. While we have tried to present a summary of the essential information on this topic, you should be aware that other items, such as local regulations, may apply to you.

What You Need to Know

Hazards associated with waste tire piles include heavy mosquito infestations and fires. Waste tires accumulate water, which is a viable environment and ideal breeding ground for mosquitoes. Mosquitoes not only are nuisances, but also can carry and transmit disease to humans and animals.

In addition to being breeding grounds for mosquitoes, waste tires also can be easily ignited, resulting in fires that are difficult to extinguish. Tire fires can burn for several weeks, causing millions of dollars of damage including soil, surface water and groundwater contamination.

Regulations

Tires that are too damaged or worn to use as vehicle tires are waste tires. The storage, hauling and disposal of waste tires are

regulated under Missouri's Solid Waste Management Law.

Storage. If you store 500 or more tires, you must have a permit from the Missouri Department of Natural Resources as a waste tire site, and you must follow the requirements outlined in the permit. If you store 25 to 499 tires, you are considered a waste tire collection center and must meet the following requirements:

- Waste tires must be stored in a way that does not cause pollution, health or nuisance problems.
- You must meet local or national fire protection standards for storage of rubber tires. Contact your local fire department for information on what those requirements are. If your local fire department does not have

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standards for storage, follow the national standards.

- You cannot store tires in a wetland, sinkhole or floodplain.
- You must store tires in a way that is unfavorable for the harboring, feeding and breeding of vectors. To do this you must do one of the following:
 - Drain any water out of the tires or store

them indoors or under cover; or,

- Cut or alter the tires so they cannot hold water; or
- Treat the tires with mosquito pesticides; or,
- Get approval from the Department for any other method of control that you wish to use before you begin using the method.

- Tires intended for resale or retreading are not regulated as waste tires provided they have over 2/32 inch of tread. Store them separately from waste tires.

Transportation. "If you pay someone to haul away your waste tires, that person needs a permit from the Department. However, you or other employees from your business do not need a permit to haul tires generated from your business. The tires may be hauled to a tire processor, site or end user. They may be hauled to a landfill if

they are cut, chipped or shredded. A tire hauler's permit is good for one year and only applies to the person or business to which it is issued.

Disposal. It is illegal to burn tires in Missouri. You cannot dispose of tires in a landfill unless the tire is cut up in at least 3 pieces of about equal size or in half circumferentially (forming two circles). Waste tires may be taken to the following types of facilities:

- A local tire retail store (regulated as a waste tire collection center).

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- A permitted waste tire processor.
- A permitted sanitary landfill, if the waste tire is cut in half circumferentially (like a bagel) or cut into thirds.
- Household trash dumpster, if the waste tire is cut in half circumferentially (like a bagel) or cut into thirds. Coordinate with a trash hauling service.
- Another state, provided the tires are managed in compliance with that state's requirements.

Processing. Anyone who processes waste tires for a fee must have a waste tire processing permit from the Department if more than 25 tires are on-site at any time. Processing includes shredding, cutting, chipping or otherwise altering.

Recordkeeping. You must keep a record of how many tires are taken in and removed from your facility each month. Include the name of the hauler and the date the tires were removed. You may contact the Department to get a recordkeeping form.

Self-Audit Checklist

When an inspector comes to your facility, there are certain things they check to see if you are in compliance with environmental regulations. It makes good sense for you to perform a "self-audit" and catch and correct problems before they result in penalties. Also, there are some compliance incentives associated with self-audits.

Use the following list to audit your waste tire storage areas and management procedures.

1. **Are you properly licensed?** Check with your local city or town to determine what licensing requirements and other rules or regulations you must comply with.
2. **How many tires are stored?** Store as few tires as possible. Store whole and processed tires in buildings, covered containers or covered to prevent the infiltration of water. Store the tires in accordance with applicable regulations and local fire department requirements for storing combustible material. Send tires to an approved disposal or recycling facility.

3. **Is your facility in compliance with applicable laws and regulations?** Make sure that you incorporate good management practices, prevent unpermitted discharge of pollutants to the environment, and not create a public nuisance.

Best Management Practices (BMPs)

Most regulations tell you what you have to do to be in compliance, but they don't explain how to do it. That's where "best management practices" come into play. BMPs are proven methods that help you to get into compliance and stay there. The following BMPs are recommended for waste tire storage areas and management procedures.

- Store as few waste tires as possible at your facility.
- Schedule regular pickup for waste tires.
- Keep tires stored indoors, if possible, or keep tire piles covered in order to prevent entrapment of water.
- If stored outdoors, store waste tires in a sunny area. (sunlight speeds evaporation of standing water and kills heat-intolerant mosquito larvae.)
- If waste tires cannot be processed in a timely manner, leave waste tires on the rims to avoid problems with mosquitoes until the waste tires can be managed properly.
- Do not burn or bury waste tires.
- Clean and maintain tire processing equipment regularly. Dirty, poorly maintained equipment poses a pollution risk from greasy rainwater run-off or dripping oil.

Contacts

1. For more information, contact the Missouri Solid Waste Program at 573-751-5401.
2. To report a tire fire after hours or on weekends, call 573-634-2436.
3. To report an environmental incident or complaint, contact the nearest regional office.

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EPA Finds HFP-1234yf an Acceptable MVAC Substitute in New MVAC Systems

EPA has issued a final rule finding hydrofluoro olefin (HFO)-1234yf acceptable as a substitute for chlorofluorocarbon (CFC)-12 in motor vehicle air conditioning for new passenger cars and light-duty trucks, effective May 1, 2011.

This rule finalizes the "1234yf" proposed rule on which ARA commented in January 2010 and focuses on identifying a new MVAC substance for new cars. This rule does NOT address issues related to the life cycle management of this new substance - rather EPA noted repeatedly that it will consider recycling and recovery practices for 1234yf in future rulings. For example, in response to an ARA comment/query about whether EPA has determined if 1234yf can be recycled, EPA noted that it will consider in a separate rulemaking whether it is necessary to modify existing regulations to include additional specifications for HFO-1234yf, including those related to recycling and recovery. EPA also responded that no new handling equipment is necessary for 1234yf. However, EPA does note that there may be costs of servicing or of disposal (end-of-life) to small businesses and it intends to conduct an analysis of such costs, and any potential significant impacts on small entities as part of future rulemakings.

Further, ARA took special note of EPA's statement in this final rule that it did NOT review HFO-1234yf for use in retrofitting vehicles and that EPA would consider the retrofit use of HFO-1234yf in MVAC systems only if it is asked to specifically ad-



dress retrofitting and the risks that are unique to that process. Because the use of alternative substitutes in MVAC systems will be an ongoing issue, ARA staff is in the process of arranging meetings with relevant EPA staff and ARA members to establish long range working relationships so that ARA concerns will be considered before a rule is written. In fact, the prompt establishment of such

relationships is crucial as just this past week EPA granted a petition filed by the Natural Resources Defense Council (NRDC) and others to withdraw its approval to use HFC-134a for MVAC systems in new automobiles. EPA will follow this move with a formal notice and comment period during which the ARA expects to be very vocal.

In this final rule, EPA repeatedly noted that it is not mandating the use of HFO-1234yf or any other alternative for MVAC systems. Rather, this final rule is simply adding HFO-1234yf to the list of acceptable substitutes in new MVAC systems. (See list <http://www.epa.gov/ozone/snap/refrigerants/lists/mvacs.html>).

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