CAST POLYMER CONNECTO

Keeping employees secure

- Establishing a workplace violence policy
- How companies are implementing SAFE PLANT

ALSO:

- Resin reuse requirements
- The effects of tariffs

PRESIDENT'S LETTER

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Cover: Safety is a vital backbone of the cast polymer industry and keeping employees secure is a major part of that mission. An article on page 13 explains how ICPA members are implementing the SAFE PLANT program, which is based on the Occupational Safety and Health Administration's safety guidelines. But keeping employees feeling safe today also means tackling a problem that is increasingly in the news: violence. See page 4 for a feature on this important issue.

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The exciting challenge ahead



THE CAMARADERIE AND EDUCATIONAL VALUE OF POLYCON KANSAS CITY 2019 are fresh in my mind as I'm sure they still resonate with many of you. To those of you who did not make it to this event: you missed a terrific and valuable show that was right on target as far as focus, and a valuable source for making new professional acquaintances and new friends.

As I take the torch of ICPA president from Luke Haas (as well as the many

other past presidents from both recent times and long-ago iterations of this group), I am excited and grateful. Having spent less than two years in this industry after a few decades in the consumer products world, both the Chicago and Kansas City POLYCONS helped me to understand a new business and made me a better candidate to lead the organization. Being welcomed into this wonderful organization and asked to take on this role has been eye-opening, to say the least. However, I'm comfortable that the collective wisdom of

our senior and junior membership will guide and challenge me to tackle and conquer the tasks at hand as well as help me to set a few new goals and targets for our industry. Please feel free to reach out directly to me at mark@virginiamarble. com with your comments, observations and ideas. Just

be careful: you are likely to be "volunteered" to help the membership by chipping in and contributing to our success. This organization needs your support, and part of my job is finding people to fill the many needs.

Our industry is enjoying some economic growth but still finds itself challenged by the sometimes-helpful (but more often intrusive) hands of government. Whether it is the regulatory aspects of optimizing raw material usage that John Schweitzer addresses in this issue or the guidance we got from OSHA for the ICPA SAFE PLANT program that Kelly Debusk covers, the government is a force we need to track and learn to partner with when we can. The result can be positive such as with the SAFE PLANT program, which is designed to help us keep our employees healthy and productive. But we also need to keep vigilance on what's happening, which is why I have tried in this issue to demystify the strong government actions of the last year on multiple tariffs and how they can bring even the best business plan to its knees.

OUR MEMBERSHIP IS FORTUNATE TO HAVE A GREAT MIX OF PRIVATE, PUBLIC AND FAMILY-RUN BUSINESSES. This industry has much going for it. Our membership is fortunate to have a great mix of private, public and family-run businesses. In this issue we profile the Canadian husband and wife team that leads Mr. Marble. While this company occupies the same continent, it lives under its own regula-

tory/legislative umbrella as well as its own world of competition and framework of customer tastes and requirements. That makes this part of our international contingent an interesting story to tell.

But whether it's cross border or U.S. challenges, we are all part of the same organization. I'm looking forward to learning more about those challenges and our industry as I serve as this year's president.

> **Mark Buss** Virginia Marble

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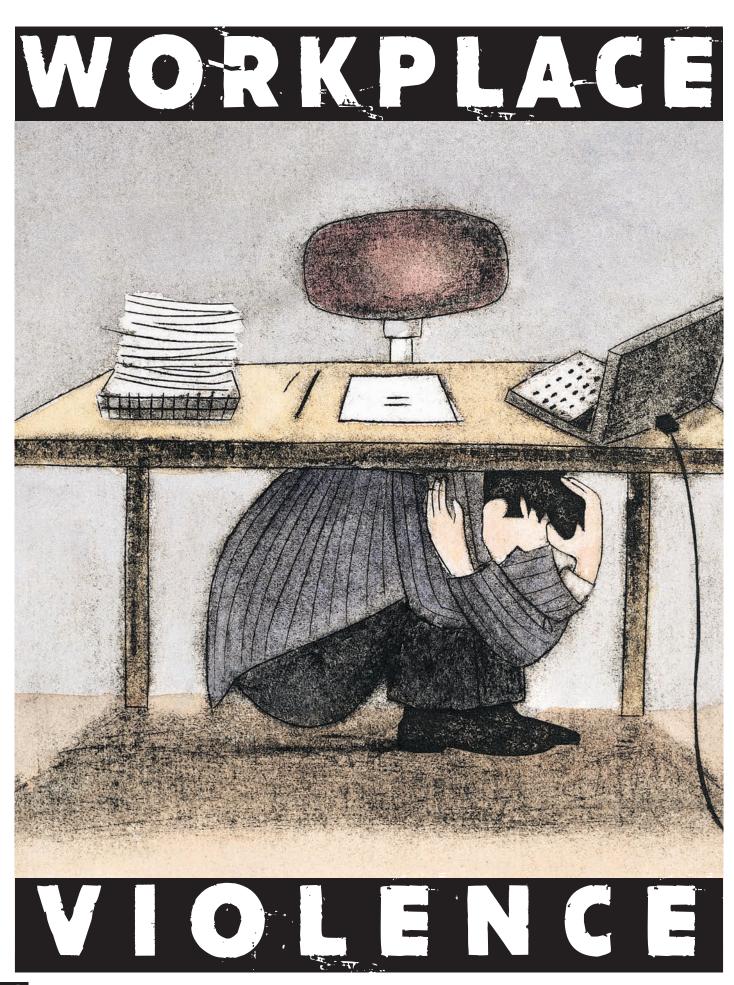
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After two horrific shootings in August added to several other incidents earlier in 2019, violence is on most people's minds. In all, more than 60

people have died in mass shootings since the beginning of the year.

But how real is the increase in violence, and do the headline-generating incidents have anything to do with the everyday challenges of running a business?

Why is it happening?

The differences in what happened with the two August mass shootings and with the previous incidents in 2019 shows there is not a single source for the problem of increased violence: The El Paso, TX shooting on August 3, which resulted in 22 people being killed and dozens more injured in a Wal-Mart, appeared to spurn from racism. Shootings near a bar in Dayton, OH in the same 24-hour period resulted in nine deaths in an incident police still can't pin on any motive despite the fact the shooter's own sister was one of the victims. In the same weekend those two incidents occurred, 40 people also were killed in Chicago in separate violent incidents that had trauma centers in the city overwhelmed enough to redirect victims to other medical facilities.

Because the headlines are so frequent these days, most people accept that violence can strike anywhere, and most employers know that job sites are one of those places. Last January, a man walked into a bank branch in Sebring, FL and gunned down five women just because they happened to be banking or working there that day. In February, a disgruntled man in the process of being fired at an Aurora, IL valve assembly plant turned guns on fellow employees and killed five.

All these incidents stemmed from separate or unknown motives. What they have created, however, are people that are afraid to go to work and need to be reassured that employers will do what they can to protect them.

The reach of violence

The Society of Human Resource Management (SHRM) re-

BY GENILEE SWOPE PARENTE

leased a major study in March assessing just how widespread the problem is today and analyzing whether noted increases have to do with more

incidents or just more reporting of incidents. The study was based on surveys of both employees and human resources professionals.

About a quarter of the workers queried say their workplace has had at least one incident of workplace violence while almost half (48%) of human resources (HR) professionals report such an incidence (25% of HR professionals said the incidents occurred in the last year), according to SHRM's study.

While many employers have programs for dealing with workplace violence, employees are often not aware of the programs: 57% of HR professionals say they provide training on how to respond to violence in the workplace but only 45% of employees say they are aware of any prevention program in place at their companies.

The reality, according to the Bureau of Labor Statistics, is that 18,400 workers in the private industry experienced some trauma from workplace violence (in 2017, the latest statistics), an increase of 33% in the last five years while 458 workplace fatalities occurred in that same year, an increase of 13%.

Most of those incidents did not occur on a factory floor: the most common victims are those in law enforcement or who work in the healthcare or social assistance industry.

However, news headlines such as the story on what happened in the Aurora factory show how susceptible facilities are and why employees are afraid. In fact, the SHRM study says that one in seven people today say they do not feel safe at work.

According to Martin Towner, an asset protection professional who has worked in retail and distribution for over 35 years, the concern isn't so much about the increase itself: he agrees with many of his peers (as well as SHRM) that part of the reason the numbers are higher than figures from the past is that reporting of such incidents has gotten better. This development has occurred because today's employers are more aware of what's happening and more willing to



"THE MOST SIGNIFICANT COSTS OF WORKPLACE VIOLENCE TODAY ARE WHAT HAPPENS TO OUR OWN ASSOCIATES-THE BROAD SCOPE OF THEIR EXPERIENCES AND CONCERN AMONG THOSE EMPLOYEES-AND THE IMPACT ON THE COMPANY'S BRAND WHEN INCIDENTS

OCCUR." – Martin Towner

report, while today's employees are getting better education and training on the dangers.

The concern isn't as much about numbers as what individual companies can do in response.

"The most significant costs of workplace violence today are what happens to our own associates—the broad scope of their experiences and concern among those employees—and the impact on the company's brand when incidents occur. That's why it's critical that companies today have a clear strategy both for prevention and for response," Towner says.

On the prevention side, that means training, education, standards, policy development and physical security. Company employees should be clear what the expectations are. As far as response, that includes developing law enforcement relationships and putting the right infrastructure in place to direct what happens should an incident occur, Towner says.

Prevention

There are many published strategies on what employers can do to prevent workplace violence, including tips compiled by SHRM, Business Management Daily and the Occupational Safety and Health Administration (see "Resource List"). The Federal Bureau of Investigation recommends these 13 steps:

- 1. Adopt a formal workplace violence prevention training policy and program, and communicate it to employees.
- 2. Have managers take an active role in employee awareness of the plan; make sure they are alert to warning signs of workplace violence and know how to respond.
- Provide regular workplace violence and bullying prevention training for all employees (both new and current), supervisors and managers. Include workplace violence training videos that can be referenced if situations arise.
- Foster a climate of trust and respect among workers and between employees and management; eradicate a bad culture of bullying or harassment.
- 5. Look out for and take steps to reduce negativity and

stress in the workplace, which can precipitate problematic behavior.

- 6. Identify and screen out potentially violent individuals before hiring while maintaining compliance with privacy protections and anti-discrimination laws.
- 7. Establish procedures and avenues for employees to report threats, other violence or if there's imminent danger.
- 8. Start a mediation program to resolve employee disputes rather than letting them simmer.
- 9. Document any threats and your response to them including terminating employees who make a threat.
- 10. Terminate employees with care and caution by involving witnesses or security for violent employees.
- 11. Evaluate security systems regularly including alarms, ID keys, passcodes, cameras and personnel.
- 12. Make sure employees know not to hold open secure access doors for others who don't have credentials.
- 13. Ensure employees with restraining or protective orders against an individual provide that individual's information and photo to security.

According to Towner, who has addressed this issue for more than one employer during his career "you could lock down your place like Ft. Knox, but that's highly impractical. It's more a matter of taking certain steps to measure your risks, paying attention to the culture in your company and looking at what can and should be controlled within the workplace."

For example, in order to measure risk, employees need to have a comfortable way to report potential problems.

"Many businesses have an anonymous internal reporting site or use a third party for managing reporting," Towner says. Others include possible violence or reporting of problem employees (or family members) as part of a companywide Employee Assistance Program.

"The key to the effectiveness of any system is confidentiality," Towner says. "Employees have to know that what they have to say will be taken seriously, but will not reflect on them personally." One effective tool as far as identifying potential problems with current employees is to do a thorough screening during hiring.

"It's vital to look for past criminal convictions that may have involved violence or potential violence such as assault, theft, use of drugs and others," Towner points out.

Employees can be taught to look for certain signs, but Towner says most training dollars go into teaching managers what to do to defuse situations before they turn sour.

"Managers are often trained on how to de-escalate workplace incidents," he says. They can be shown how to use non-threatening, non-verbal communication with a person on the verge of acting violent, for example.

"The more a person loses control, the less they hear your words. They are more likely, then, to react to non-verbal communication that is calming," Towner says. "For this reason, managers need to be mindful of gestures, facial expressions, movements and tone of voice," he adds.

Response program

The second half of an effective employee program is teaching employees and managers what to do should violence occur.

The most essential part of response is to establish a plan.

"This pre-established plan should be a documented strategy that outlines what relevant departments should do and what role key organizational leaders will play," Towner says.

The plan should focus on internal actions in areas such as assessing the condition of associates and how the business can be brought up and running again, but also include response to the outside such as how to handle media," Towner points out.

A number of resources exist that can help a company develop a specific plan (see "Resource List"). One good source that many companies overlook in planning responses is to check with local law enforcement agencies, Towner says.

"Many communities have agencies that have community resources such as training for management or employees, but companies can also seek help in the form of physical security evaluations of facilities from local police or security professionals," he says.

Towner pointed out that there are many third-party consultants who are in the business of helping companies put together a plan and set up the right reactions to incidents as well as put together training programs for employees and managers on prevention.

There also are resources for specific problem areas. For example, he said one of the most common threats today involves suicidal people.

Some resources:

- OSHA's fact sheet on workplace violence and what to do: www.osha.gov>topic>workplace violence
- SHRM's online toolkit, "Understanding Workplace Violence Prevention and Response" at www.shrm.org (must be a member).
- FBI's "Workplace Violence: Issue in Response" at www.fbi. gov>resources>reports and publications.
- National Suicide Prevention Lifeline, "Know the Risk Factors," at www.suicidepreventionlifeline.org>learn.
- "Seven Steps to Implementing a Workplace Violence Response Plan," at www.losspreventionmedia.com (search for "Seven Steps")
- "12-Point Action Plan–Handling Violence in The Workplace" at https://hrdailyadvisor.blr.com (search for "12 Point Action Plan")
- Workplace Violence Prevention Program from Hartford Insurance (www.noao.edu/safety/itt_hartford_risk_ management_resources/workplace_violence_ prevention.pdf)

"I recently learned that female suicide incidents, in particular, are on the rise, with the rate of suicide in women nearly doubling in the last 20 years," he says.

The suicide issue is one that has changed over the years, Towner adds. "People are much more aware of and have a greater understanding about suicide so it should be an important part of awareness and response training," he says.

A good resource for best practices and advice in this area is the National Suicide Prevention Lifeline.

The main idea to keep in mind with all of these issues, however, is that there truly is no way to predict what might happen; prevention strategy and responses need to be fluid.

For example, SHRM's study says policies of the past such as zero tolerance are losing favor (falling to 39% in the latest survey from 47% five years ago) because companies are realizing that violence must be dealt with in ways that take the specific context of an incident into consideration.

"Each workplace violence event is unique, which makes it difficult for putting together lectures and materials," he says. "The best training is to relay to your people what has happened elsewhere that could have happened within your company and then teach people based on the lessons learned," he says.

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GENILEE SWOPE PARENTE is executive editor of **Cast Polymer Connection**. She welcomes story ideas. Contact her at gsparente@ verizon.net.

WHAT CAN I DO WITH MY SCRAP RESIN?

The following material is adapted from the document, Guidance on Reuse and RCRA Generator Treatment of Hazardous Waste Resins and Gel Coats, which is available from ACMA.

BY JOHN SCHWEITZER

ICPA MEMBER COMPANIES USING RESIN AND GEL COAT MIXTURES for producing

cast polymer products often generate liquid waste resin and gel coat mixtures during production and maintenance operations. Because of the high costs and risks associated with hazardous waste transportation and disposal, ICPA member companies continually seek ways to reduce the volume of hazardous wastes generated and shipped offsite for disposal. As a result, many companies are currently looking into onsite options for reusing spent resin and gel coats from one production process for another process or using onsite generator treatment to convert hazardous waste resins and gel coats into non-hazardous solid wastes.

The U.S. Environmental Protection Agency's (EPA) solid and hazardous waste regulations and individual state regulatory programs define when and how these scrap resins and gel coat materials become classified as solid and hazardous wastes. These regulations also provide authorization for performing onsite generator treatment of hazardous wastes without obtaining a Resource Conservation Recovery Act permit.

However, classification requirements and legal authorization for generator treatment also require companies and hazardous waste generators to comply with a long list of specific regulatory requirements. These requirements also vary depending on several factors including facility operations, how the generator treatment activities are conducted by a company and state-specific differences in regulations.

For these reasons, ICPA member companies that wish to reuse scrap resins, gel coats, catalysts or other materials to avoid classification as solid waste or that are conducting onsite generator "treatment" of hazardous waste resins and gel coats need to clearly understand and comply with many federal and state

solid and hazardous waste regulatory requirements.

Onsite reuse and recycling

To be classified as a *hazardous* waste, a material must first be classified as *solid* waste. As a result, cast polymer manufacturers may want to investigate options to reuse scrap resin, gel coats, catalysts and other chemicals onsite in a way that keeps these from being classified as solid waste while managed onsite. This exclusion from the solid waste definition has been accomplished by several companies for various materials generated and managed on their sites. However, the regulatory qualification requirements are extensive and vary by state.

Based on EPA's and most state definitions of solid waste, the onsite reuse and recycling of scrap resins, gel coats, catalysts and other chemicals used in cast polymer can keep these materials from classification as solid wastes. When that happens, the onsite management of the materials is not subject to hazardous waste regulation.

EPA's solid waste regulations provide an exclusion for unneeded commercial chemical products such as resins, gel coats and catalysts recycled in a manner that is not disposal or burning for energy recovery (unless that's the originally



BASED ON EPA'S AND MOST STATE **DEFINITIONS OF** SOLID WASTE, THE ONSITE REUSE AND **RECYCLING OF** SCRAP RESINS, GEL COATS, CATALYSTS AND OTHER CHEMICALS USED IN CAST POLYMER MANUFACTURING **OPERATIONS CAN KEEP** THESE MATERIALS FROM CLASSIFICATION AS SOLID WASTES.

intended purpose). As a result, if a cast polymer manufacturer has outdated resins or other materials from one production process, when these materials are accumulated and managed onsite before being used in another process or product, these materials are not regulated as a solid and hazardous waste. This assumes the materials are not accumulated onsite "speculatively" for a purpose other than the normal operations of the business.

EPA regulations also provide an exclusion for other types of secondary materials (e.g., spent materials) when they are recycled to serve as ingredients in an industrial process to make a product or are used as effective substitutes for commercial products. Based on this exclusion, scrap resin and gel coat generated by one production process that can be used without further processing (i.e., filtering, reclaiming) as a raw material to make another product are not classified as a solid waste. Therefore, they are not considered a hazardous waste under

EPA and state regulations.

This non-waste classification for onsite reuse of secondary materials is subject to specific exclusions and requirements, so manufacturers should confirm with EPA or their state regulatory agency for their site-specific processes. However, there are companies that use scrap resin generated by one production process as a raw material for another product, but the scrap resin is not classified or managed onsite as solid waste (and therefore hazardous waste) before the second product is made.

Hazardous secondary materials generated and recycled legitimately before reuse onsite with processes under the control of the generator of the materials are also excluded from the solid waste and hazardous waste definition. Cast polymer manufacturers can use this exclusion to eliminate onsite hazardous waste requirements for managing spent materials that require further processing before they can be reused under this exclusion.

It is important to remember that states often have key differences from EPA in the definition of solid waste. These must also be considered in any regulatory determination for proper onsite management of unneeded, scrap or spent hazardous materials.

Treatment of resin and gel coat

EPA regulations define hazardous waste treatment as the following:

Treatment means any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume.

State-authorized hazardous waste regulatory programs typically have the same or a similar regulatory definition of "treatment." However, states have different interpretations for the intent and meaning of regulatory language, so it is always important for manufacturers to check with state environmental regulatory agencies. For example, the state of Washington has issued guidance that declares the following:

Some manufacturing processes generate waste resins already containing enough catalyst to complete polymerization. The mixture hardens into a nonhazardous, solid waste without additional catalyst. In these situations, the hardening process is not considered treatment by generator.

At ICPA member companies, when hazardous waste resins and gel coats contain catalysts at the time they are generated, they may continue to polymerize during onsite accumulation in their containers (i.e., drums, buckets) without any further aid or action by the generator. Essentially, after generation, a company will take no additional actions but accumulate the hazardous waste onsite in a proper container or tank in accordance with hazardous waste regulations.

This unaided process of polymerization generally meets the EPA's and the majority of state definitions of "treatment." Companies may also use additional onsite techniques or processes designed specifically to initiate and aid in the onsite polymerization process to convert hazardous waste resins and gel THE USE OF INDIRECT HEAT TO AID IN POLYMERIZATION IS NOT CLASSIFIED **AS "THERMAL** TREATMENT" BECAUSE THE DEVICES EMPLOYED (I.E., HEAT BANDS, HEATED CABINET, HEATED ROOMS) DO NOT USE ELEVATED TEMPERATURES AS THE PRIMARY MEANS TO CHANGE THE PHYSICAL COMPOSITION OF THE WASTE. IT IS THE CATALYZED POLYMERIZATION THAT IS THE PRIMARY MEANS.



coats into non-hazardous solid wastes. When conducted in accordance with the applicable hazardous waste regulation, these techniques and processes will also fall within the definition of generator treatment.

To do this, the catalyst can first be added to non-catalyzed or under-catalyzed hazardous waste resin and gel coats *after* the waste is generated and accumulated in the container. This process may also include manual or mechanical mixing of the hazardous waste to ensure the added catalyst is distributed throughout the waste. Second, indirect, low-temperature heat can be applied to the containers to ensure initiation of any catalyst used for polymerization. This indirect heat can be applied to drums using exterior heat bands and to smaller containers using heat plates. Indirect heat also can be applied by using small, heated cabinets for hazardous waste drums and containers or entire heated rooms as a 90-day accumulation area for the drums and containers.

The use of indirect heat to aid in polymerization is not classified as "thermal treatment" because the devices employed (i.e., heat bands, heated cabinet, heated rooms) do not

use elevated temperatures as the *primary* means to change the physical composition of the waste. It is the catalyzed polymerization that is the primary means.

To summarize, classifying the waste resin or gel coat polymerization process as treatment, when unaided or aided by the generator, is based on the physical change in the waste from an ignitable liquid to a non-ignitable solid material. This can result in reclassification of a liquid hazardous waste to a non-hazardous waste.

However, the specific regulatory requirements for the generator treatment are extensive and may vary depending on the activities conducted by the generator as part of the treatment process. Because of this, companies conducting onsite generator treatment should do so only after a careful review of their specific hazardous wastes, onsite hazardous waste management methods, and the applicable EPA and state-specific regulatory requirements.

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How to implement the SAFE PLANT program

BY KELLY DEBUSK

WE ALL WANT TO KEEP OUR EMPLOYEES AND OUR FACILITIES SAFE not just because of regulatory requirements, but because they

are the lifeblood of our businesses. Until recently, ICPA members didn't have a standardized way to do that. The SAFE PLANT program, which has the support of the Occupational Safety and Health Administration (OSHA), gives cast polymer manufacturers the guidance and resources they need to create a program and the flexibility to gear it to the individual company and its own special challenges and needs.

In the last issue of **Cast Polymer Connection**, ICPA's SAFE PLANT program was formally introduced. I wanted to follow that up with a look at how different companies began the program in their facilities. I've kept company A anonymous because it's a client, but all respondents were eager to share what they are doing.

Here's some of the questions I asked, the reasons I chose the questions, and what ICPA members had to say:



Where is your facility on safety?

The first step in the process of participation is to go to the ICPA website to sign up, which costs

nothing. Once a company has done this, the next step is to assess where its facilities are with current safety procedures. SAFE PLANT has an assessment form that companies can fill out to help them determine where they are and what aspects of their safety programs need improvement. This will vary depending on individual circumstances.

For example, Company A is a manufacturer that has been using my services for a few years to help improve plant safety. It has already implemented extensive employee training programs for hazard communication (hazcom) and forklift safety. I have also conducted a monthly inspection to help leaders identify potential hazards in the workplace. There was little to no employee involvement with safety, however, other than mandatory participation in training programs as well as reporting any injuries that occurred.

On the other hand, at ACS International, Tucson, AZ, Guy Matten, vice president of Operations, reports that when the company signed up for SAFE PLANT, it was already conducting safety meetings with all employees every three months, and it had a safety team in place.

At International Marble Industries (IMI), Woodstock, GA, David Long, purchasing manager, reports that his company was already safety conscious with many protections and procedures in place, but wanted to use the SAFE PLANT to reach a higher standard.

Superior Home Products, Wentzville, MO, has had a safety program in place for years and has an entire section of its handbook devoted to safety but says joining ICPA's SAFE PLANT program will allow it the opportunity to "walk the safety talk," according to Mary Smiley, safety manager, Human Resources. She says that kind of continuous action is a necessity to keep a program vital.



What aspects of SAFE PLANT have you decided to focus upon this year?

As part of participation, companies choose what area of safety they will put effort into for the immediate future.

For Company A, the choice of how to participate was obvious. Management was already taking safety precautions, but there was little to no employee involvement. To be effective in a program like this requires participation by all levels of employees. Company A has chosen to focus on worker participation.

ACS, on the other hand, decided to focus its efforts on education and training, specifically its forklift safety training program.

IMI says it will put its efforts toward hazard identification and assessment as well as take a look at consistency of the overall safety program and how record-keeping needs to be improved.

Superior has chosen two areas of focus: worker participation and safety training.



Was a safety team already in place, and how did you choose that team?

Because no standard safety program has ever been used before in the industry, each company has a different approach and is at a different level as far as choosing who is on their safety teams.

ACS and IMI both had safety teams already in place before beginning SAFE PLANT.

ACS has a three-member team consisting of someone from management, a person from manufacturing and someone from the lab. The manufacturing and lab team members were chosen by the employees themselves.

IMI asked its department heads to either participate as part of the safety team themselves or to designate someone in the department to serve on the safety team. Currently, all department heads are serving as part of the safety team.

Since Company A chose worker participation as the area of focus, putting the safety team in place was a first logical step. Management chose a key person from each of the three production departments and also asked the maintenance supervisor and the janitorial supervisor to serve as part of the safety committee. Once safety team members had time to learn their roles, they were asked to nominate one person from their departments to serve as an alternate in the event they couldn't participate in one of the safety meetings.

Because Superior both makes and delivers/installs, it has two safety committees: shop and field. The office team joins in shop committee meetings and activities whereas the sales team is part of the field committee.



How often do you meet and what happens?

Part of the value of putting together teams is that they meet on a regular basis to discuss status and what needs to be done.

Since onsite inspections were already being conducted once a month at Company A, that company decided this timeframe would be a great interval for the safety team to have meetings. The safety committee volunteered to have working lunches to conduct these meetings. The company provides lunch for the team and pays members for the hour. The first half of the meeting, the team discusses any accidents or near

misses, any hazards observed and progress of the previous month's safety items. For each hazard identified, the team brainstorms on the best solution for minimizing or eliminating hazards. The second half of the meeting is a safety inspection of all departments. The safety inspections were already taking place, but now the safety team is beginning to understand aspects of what they should be looking for that could be hazardous. Having employees continuously looking for dangers is beneficial because they are the ones on the production floor full-time.

ACS conducts safety meetings with all production employees every three months. The motto for these meetings is, "Everyone has a voice." The company believes, when it comes to safety, the only silly question asked is the one that wasn't asked.

IMI conducts weekly safety meetings. The company tries to keep these meetings to 15 to 20 minutes so employees do not lose focus or have to take a lot of time away from other tasks.

Superior holds field committee meetings quarterly and shop meetings monthly. To keep ideas fresh, the company appoints safety reps that spend one year on the committee. Each of these reps conducts one or two "tool box talk" meetings with his or her teams to discuss a particular topic. The company also has an annual safety training and meeting schedule (calendar) that includes monthly safety focuses (concurrent with OSHA monthly focuses). Shop safety committee reps also perform monthly department safety audits. Additionally, each week that a near-miss occurs, managers get together with Chip Daggett, the owner of the company, to investigate the near-miss, determine the best solution and focus on prevention. These meetings have led to numerous safety improvements companywide.

What challenges have you faced in putting safety systems in place?

The challenges and resources required for implementing safety programs depends on individual circumstances and where a company is in the process.

Company A posts the minutes from all the safety meetings and inspections on the employee bulletin boards. The belief here is that you cannot fix what you don't know about. The notes include any hazards identified, the responsibility of management for fixing the hazard (such as better personal protection equipment—PPE), the responsibility of the employee (such as remembering proper procedures and always being aware) and a timeline for implementation to minimize or eliminate the risk.

Employees are encouraged to review these minutes each month. Additionally, it is the responsibility of the safety team



members to relay the information to staff in their departments in case not every employee reads the minutes. One month a disgruntled employee took the notes off the bulletin board and turned them into OSHA, triggering an inspection. Company A is still awaiting the results of that investigation but says the OSHA inspector was in less of a hurry to continue an aggressive investigation after learning the company was acting as part of a partner program of the OSHA Safe and Sound Program. Company A provided OSHA with the minutes of all the meetings since the start of the program. The company has decided that despite the challenges posting could present, the minutes of all future meetings will still be put out for employee review and input.

ACS says it feels the biggest challenge is time. Since the focus is on training, the challenge has been to find the time to gather employees into a room to conduct this training. Currently, the goal is to have all new employees trained on all the safety programs of the company within their first three months of employment.

IMI says it has not encountered any challenges at this point.

The biggest challenge for Superior has been allocating the time necessary for putting its program into effect. The company, which has had incident and near-miss investigation and reporting procedures in place many years, says the challenge in any safety program is constantly communicating to try to keep employees aware of what they should do.



What innovative ideas have you used to implement the program and to motivate employees?

As each company puts SAFE PLANT in place, it will come up with new ideas that can be used ovees engaged and involved

to keep employees engaged and involved.

Company A decided to have a safety competition between the three departments each month. Using the monthly inspection sheets, a department is determined as a winner based on those sheets, and the members of that department receive \$25 gift cards or a company logo item such as a shirt or hat. The rewards change monthly so employees do not get bored.

Additionally, since employee involvement was new, management decided to host a facility-wide safety luncheon for the recent July meeting. Lunch was catered and safety-related raffle prizes such as "cooler" safety glasses than the standard-issued glasses were given.

The employees have been excited to see which department wins each month, and there has been a noticeable difference in safety and general housekeeping in all departments. The luncheon was a success, and employees have requested this be done again in December. ACS asks all its employees, "Has anyone experienced, witnessed, or seen anything that could be dangerous to our safety over the past three months?" Because the company wants everyone to have a voice, Guy Matten tells employees, "It's guaranteed if you haven't shared anything at this point, I will call upon you to share something." If issues are identified, everyone in the company talks about ways to improve or correct what's been observed; an employee or employees are assigned to correct things; and a due date is set.

One innovation IMI has come up with is fluorescent safety shirts for all its employees to increase visibility. This has been especially useful in forklift areas. Company A has also provided each employee with a fluorescent, closeable top water bottle (that actually has "water" printed on it) and installed filling stations throughout the facility so that employees can stay hydrated without potentially confusing water bottles with other chemical containers. They also have a personalized PPE program. The company reimburses employees for the equipment to guarantee PPE is worn and that it is the proper fit for each employee.

Superior says its annual calendar has been "extremely helpful" in helping the entire company stay on top of its game and engaged by concentrating on similar topics for each month. Smiley also said that this year, company team leaders joined safety reps in audits to strengthen company knowledge and commitment.

Conclusion

As the examples in this story show, whether a company meets weekly, monthly or quarterly is up to the company's discretion. What challenges implementation presents depend on individual circumstances, and how to best use employee time can vary according to what's done. What's clear is that SAFE PLANT is a program that can be geared to the individual company and that the program is an ongoing effort in every company.

Remember, the first step is to go to the ICPA website and sign up for the free SAFE PLANT program. Every step taken after that point will count towards the improvements that the business agrees to make annually. The whole concept of SAFE PLANT is for individual businesses to start where they are and progress at their own pace.

"I often compare safety to golf," Smiley says. "You can never quite beat it, but you can play a good game if you stay on top of it."

KELLY DEBUSK is the owner of Composites Compliance, LLC (www. compositescompliance.com). She has more than 20 years of experience in environmental and safety regulations governing the composites industry. She can be contacted at k_debusk@compositescompliance.com.



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Resin % required in matrix*	23 - 24	27 - 28	32 - 33	42 - 43	45 - 46	47 - 48
Loose bulk density (lbs./cu.ft.)	65	58	46	29	29	28
Specific gravity	2.3	1.8	1.5	1.0	1.0	1.0
Free moisture content	< 0.4%	< 0.4%	< 0.4%	< 0.4%	< 0.4%	< 0.4%

*Resin % recommendations are based on an 800-1000 cps casting resin at 70° F.

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The battles over trade and tariffs



BY MARK BUSS THE LAST 12 MONTHS HAVE BEEN VERY

BOSS ACTIVE ONES IN WASHINGTON, D.C. as our government wrestled with trade policy and the imposition of tariffs on key trading partners worldwide. While the cultured marble/cast polymer industry has not been directly impacted, we've seen severe effects on some other countertop materials, including stone. Meanwhile, the effect on the general building products sector has been costly.

The situation can be broken down into two distinct regulatory avenues of actions: The Cambria-inspired tariffs and Section 301 tariffs.

Cambria-inspired tariffs

In the summer of 2018, Cambria (one of the largest U.S. manufacturers of quartz) filed a petition with the federal government claiming the company had been financially harmed by the increasing volumes of Chinese-made quartz imported into this country. Such complaints are handled by the U.S. Department of Commerce (Commerce), specifically the International Trade Commission (ITC). The petition, which is a matter of public record, resulted in investigations into the imposition of countervailing duties (CVD) and anti-dumping duties (ADD).

CVD is a customs duty on goods that have received government subsidies in the originating or exporting country.

ADD is a customs duty on imports that provides protection against the "dumping" of goods in the U.S. at prices substantially lower than the normal value.

The decisions by Commerce and ITC during the investigative and final determination periods on this Cambriainitiated action resulted in duties on Chinese quartz of 336% and more. These duties have been collected by U.S. customs since the third quarter of 2018. They have been the source of significant friction within the stone fabrication community with accusations flying between Cambria and other industry players. The government hearings on the tariffs were extremely contentious and resulted in anti-Cambria factions forming from stone fabricators nationwide.

In the end, the government sided with Cambria. With ITC's final determination in June of this year, the tariffs became final. Within days of that decision, Cambria filed a separate action against imports of guartz from India and Turkey blocking imports from those other countries. This action, which is already under Commerce review, resulted a ruling on CVD and ADD that will begin on or about October 1, 2019. This action has been delayed recently by a lawsuit against Commerce by a major national stone distributor. The impact of this new Cambria action exasperates further what is likely to be a shortage of quartz availability in the U.S. as the few manufacturers we have in this country cannot supply the product in enough quantity to meet the demand of

STONE FABRICATORS HAVE BEEN FORCED TO ATTEMPT TO RAISE PRICES; HOWEVER, LARGE BUILDERS AND DISTRIBUTORS. AND FABRICATORS THAT MADE PLANS AND PLACED ORDERS MONTHS BEFORE THESE DEVELOPMENTS IN ANTICIPATION OF FUTURE DELIVERIES ARE NOW BLIND-SIDED BY INCREASED COSTS WITH LIMITED ALTERNATIVES.

cators that made plans and placed orders months before these developments in anticipation of future deliveries are now blindsided by increased costs with limited alternatives. The final burden of these tariffs will eventually be on the consumer. Non-Chinese/non-U.S. alternatives for natural stone exist, but changing sources of supply is not easy.

In the end, the result from the ongoing Cambria-inspired actions, Section 301 tariffs and ongoing Chinese trade negotiations is that importers, fabricators, builders and the entire supply chain have been and will continue to be severely burdened for an unknown period of time by the worst situation any business can face—uncertainty of material supply and price.

the building products industry as far as the variety of price points and applications.

It is also interesting to note that, for the most part, Cambria was not joined by other U.S. quartz manufacturers in these China and India/Turkey actions. Simple supply theory tells us the impact will result in significantly higher prices. Cambria themselves used the opportunity to continue raising prices during the months of government action.

Section 301 tariffs

In the fall of 2018, President Trump unilaterally decided to impose 10% tariffs on a specific but extensive list of products imported from China. Included in that list were natural and engineered stone products that were pre-cut or slab materials used in countertops. At the time Commerce implemented these tariffs, President Trump threatened that if the Chinese did not negotiate in good faith on overall trade issues, these tariffs would be increased to 25%. That increase occurred and has been implemented by Commerce and U.S. customs on all imports that shipped from China after May 10, 2019. These duties hit at the core of the lower- to middle-priced countertop segment.

In August 2019, the President announced that these duties would move to 30% on Oct. 1. Meanwhile, brand new 15% duties were threatened for all other imports, which would include Chinese cultured marble and porcelain sinks—duties that were slated at press time for a Sept. 1 implementation.

Stone fabricators, some of which are also cultured marble manufacturers, have been forced to attempt to raise prices; however, large builders and distributors, and fabri-

Hitting home

Our company's experience in this nightmare has impacted our ability to assure customers have access to a supply of affordable stone countertop alternatives when they choose not to buy our U.S.-made cultured marble. Despite the fact that the U.S.-originated quartz companies in this business cannot meet overall U.S. marketplace demand and the fact that there is no meaningful volume of U.S.-originated natural stone available, our government has chosen to handcuff the fabrication industry, which affects not only its many owners, but also their employees, limiting customer choices and impacting residential and commercial property owners' wallets.

MARK BUSS is general manager of Virginia Marble Manufacturers Inc. (www.virginiamarble.com) in Kenbridge, VA and current president of ICPA. He can be reached at mark@virginiamarble.com.

Stay tuned

If you want to follow the pending actions of the ITC and Commerce please see these links:

- China Cambria CVD/ADD: https://www.usitc.gov/investigations/701731/2018/quartz_ surface_products_china/preliminary.htm
- India/Turkey Cambria CV/ADD: https://www.usitc.gov/investigations/701731/2019/quartz_ surface_products_india_and_turkey/preliminary.htm
- Section 301 Tariffs: https://ustr.gov/issue-areas/enforcement/section-301investigations/tariff-actions

Mr. Marble: Canadian coast-to-coast quality and 30-plus years of experience

ICPA HAS BEEN PLEASED TO WELCOME INTERNATIONAL

MEMBERS into its family from several countries, including Mexico, Jamaica, Germany and Canada. The hope is that the more widespread membership is, the more resources and ideas the association can gather. Those companies who operate in other countries have their own challenges because different governments oversee their businesses, regional tastes influence purchases and different cultures affect how business is conducted. However, it doesn't take much to see that crossing borders doesn't matter significantly in important ways: many of the cast polymer manufacturers in other countries started in ways similar to their counterparts in the U.S., and they have similar values and approaches.

Mr. Marble in Ontario, Canada is a good example.

Owner Gavin Heilbron runs the family business, which is headquartered in Concord, Ontario, with his wife Isabel, who joined the company about 10 years after the business started in 1985. His brother Nigel is also part of the staff.

The business came about for the same reason as many cast polymer companies in the U.S.: it was a business opportunity.

"My father went to a trade show and saw the possibilities for the cultured marble industry. He then gave me the opportunity to get into this business, and a family friend became a partner," Gavin says. "The partner was involved in marketing and sales, and I was involved in production."

The name "Mr. Marble" came from a family brainstorming session, and the doors opened with just four employees making vanity tops, bathtubs, whirlpools and wall panels. The partner eventually moved to the Caribbean to go into the hospitality industry in an amicable separation, and Gavin took over the cultured marble business in Canada with Isabel's support.

Today, Mr. Marble is national with a wide range of products offered through big box stores, smaller retailers and boutique shops. Mr. Marble also deals with some of the larg-



Isabel Rodriguez and Gavin Heilbron at POLYCON 19 Kansas City

est high-rise condominium developers and low-rise builders in the company's part of the world.

Major milestones and today's challenges

Like companies in the U.S., the 1990s were good years for the cast polymer business in Canada. By 1999, Mr. Marble could no longer operate from its small plant of only 5,500 square feet, so it moved to the current facility, which is 20,000 square feet. The company currently employs 40 people.

During the 1990s, Mr. Marble made some significant improvements in its manufacturing processes through autocaster and computer numeric coding machines. With Gavin's strong understanding of the market, the company decided to begin making its own molds to create products that customers and designers were asking for; namely, those that were more modern, trend-setting designs.

In 1995, Mr. Marble signed on with its first big-box store Rona and by 2008, it has relationships with big-box giants Lowe's and Home Depot (the relationship with Home Depot ended in 2012). A visit to the company's website reveals exactly how far the company's reach is today stretching from British Columbia to Nova Scotia and including not only big box stores, but small retailers, designers, cabinet shops, hardware stores, plumbers, builders' centers, and kitchen and bath specialty shops. The products are offered in over 285 locations throughout Canada.

Because of the extensive reach, Gavin says one of the main challenges of its business model is the cost of transportation, while one of the main benefits is the broad reach. Still, the company does very little advertising or formal marketing, relying instead on showrooms, its reputation and good informational materials. "Most of the marketing we do is through word of mouth. Having beautiful displays in every store explaining our products and its benefits is what sells our product," Gavin says.

One of the most important aspects of such a business model is good communication with suppliers, he adds.

"Our salespeople have established strong relationships with big box stores. Also, we've built a solid base of great relationships with builders in each regional area," he said.

The company's website has become important in reaching both potential suppliers and in educating the public about the products. Mr. Marble redid the site in 2017.

Another major challenge for Mr. Marble is the cost of raw materials since many of those materials are sourced in the United States, meaning the Canadian company has to pay up to 30% more because of the exchange rate.

What's popular in Canada?

Gavin says that tastes in Canada currently trend toward contemporary designs.

The hardworking staff at Mr. Marble



"We have a lot of requests for modern design rather than traditional styles, and we have to be constantly innovating to keep us up to date and keep customers happy," he says.

He also says he's seen a recent upswing in the need for showers and sinks that appeal to the senior population.

"The special needs showers bases are becoming very popular," he says.

As far as colors and materials, Gavin says that in his many years in the business, keeping up with what's popular has always been a never-ending process of education and paying attention.

"We base our choices on colors we believe are in demand, checking out designer magazines and other sources from around the world," he says. The company prepares various color samples and then asks for customer and other input to choose the ones it will offer.

For example, "one of our sales managers took samples to Lowe's and Rona associates for feedback, and also asked his neighbors at home," Gavin says.

He says that the ability to make its own molds is also an important part of the company's success because it allows the plant to customize production to a customer's demands and tastes. For example, Gavin said one of the most interesting projects the company did over the years was a waterfall pattern, which was a challenge that could only be met because Mr. Marble had the ability to design it from the ground up and produce the parts through its own molds.

Other challenges/the competition

Besides transportation costs and the exchange rate, which are unique challenges for national and for Canadian companies, Mr. Marble has another major issue it faces, and it's one that is a universal problem throughout North America: the need for skilled workers.

"This is more challenging today than it's ever because the younger generations do not want to work in manufacturing. We use an employment agency and word of mouth through our own employees," he said.

As far as competitors, Mr. Marble says he faces only a few other manufacturers in Canada but that in his country, he faces competition from manufacturers in China and other foreign sources, including the U.S.

The biggest source he battles for business, however, is not other cast polymer makers.

"The real competition in this day and age is other materials. Cast polymer is just one material offered in the kitchen and bath industry today, and there are many choices in price and availability. We just have to make sure ours is the best and most widely available product," he says.



One of the beautiful displays that help sell the company's products through retail outlets

ICPA and POLYCON

Mr. Marble has been an ICPA member for many years off and on and Gavin says, after attending POLYCON, he has great hopes and expectations for where the association can go and how it can help with the business.

"The leadership of the organization has improved tremendously in the last few years, and I hope it will continue this trend as well as show us the skills we need to run our businesses in efficient and effective ways," he says.

That can only be done by bringing the various manufacturing businesses together in meetings such as this annual meeting, Gavin said.

"It is always excellent to talk to other business owners and to see the new products available today. This exchange of information should help all of us to raise the level of expertise and the quality of what we can produce as an industry," he said.

For himself, personally, Gavin says his career has been rewarding.

"I truly enjoy running my business. Every day is a challenge for myself and my team and being able to overcome those challenges, while still being able to determine my own schedule, makes this a great job," he says.

GENILEE SWOPE PARENTE is executive editor of **Cast Polymer Connection**. She welcomes ideas on which member companies to profile. She can be reached at gsparente@verizon.net

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ICPA board changes announced

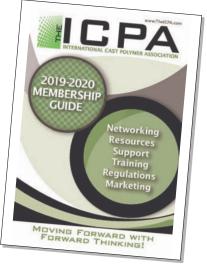
ICPA's board recently welcomed a new member to its ranks: Kerry Klodt, vice president of operations at Tower Industries. She began serving July 1, filling a manufacturer seat vacated by Bill Sanders, former ICPA president and owner of Alamo Marble, who has served many years of service to the association and industry.

Other changes include:

- Steve Wetzel, vice president of Sales, Interplastic Corporation, joined the board as a new supplier member. He will carry out the term of previous board member Ken Legenza.
- Matt Pulliam, AGCO, has agreed to serve as the executive committee's treasurer. Dirk DeVuyst, former secretary/treasurer, will remain on the committee as secretary.

ICPA creates membership guide

Wondering what benefits ICPA provides or maybe how to spread the word to colleagues? Members now have a new tool that gives them talking points about the many benefits of being a member and how companies can take advantage: The ICPA



2019-2020 Membership Guide.

The guide explains those benefits, from networking opportunities to training to monitoring of government developments and marketing. It explains how the association unites the industry and provides examples of what it can do for individual companies—from providing programs such as SAFE PLANT to giving discounts on training and providing suppliers opportunities to market to the cast polymer industry. It also discusses POLYCON and its progress during the five years of its existence.

The guide is now part of packets that go out to new members. It is also available as a member resource online at https://theicpa.com/new-icpa-membership-guide.



Put April 15-17 on your calendar

The dates for the 2020 POLYCON Park City Utah have been set for April 15-17 at the Grand Summit Resort.

POLYCON is now in its sixth year of existence with each year seeing a growth in attendance and enthusiasm.

The Grand Summit is billed as one of the country's largest four-season destination resorts with activities and events lasting from



summer through winter. It's nestled among the mountains, which creates scenic activities and outdoor fun. Inside the resort are luxury dining and accommodations.

Park City, a historic town, is a four-mile scenic drive from the resort, and the airport is just 35 minutes away in Salt Lake City.

Planners are now lining up an exciting agenda for learning and education.

ICPA has several members in the area that are helping to set up plant demos, tours and other events. They include Sand & Swirl in Ogden, Utah and Tyvarian International in Lindon, Utah.

Registration begins December 1. Go to www.POLYCONevent.com for the latest information.

Marketing Committee formed to promote cast polymer products

ICPA recently formed a marketing committee headed by new president Mark Buss, Virginia Marble. The committee is now

in the formulation and planning stages, but its purpose is to create a campaign to market cast polymer—the industry and what it makes—to the general public.

One of the first steps the committee has taken is to develop a survey that will go out to members to ascertain what they think needs to be done for the industry and association in regards to marketing strategies.

To ask about serving, email Executive Director Jennifer Towner at jennifer@theicpa.com.

ICPA members participate in Safe + Sound Week

Several members participated in the recent Safe + Sound Week, a major initiative by the Occupational Safety and Health Administration to recognize the successes of workplace health and safety programs and spread the word about safety programs such as SAFE PLANT. This year's week was August 12-18. Nationally, more than 2,700 businesses were expected to participate. Companies are encouraged to develop programs within their own operations to focus on the issues or to work with their communities on different programs.

Cast Polymer Connection will report on what happened with ICPA members in the next issue.



ICPA's SAFE PLANT program now has many participants

The ranks of companies that have decided to commit to ICPA's SAFE PLANT program are growing. As of August 1, these companies are participating: ACS International; Alamo Marble; AGCO, Inc.; Composites Compliance; Counter-Tek; Elite Marble; International Marble Industries; Majestic Kitchen & Bath Creations; Mercury Molds; MPL Company; Sand & Swirl; Syn-Mar Products; Superior Home Products; Tower Industries; and Virginia Marble Manufacturers.

A story on how the program is being implemented begins on page 13.



ICPA's newest member is supplier **TR Industries** South Gate, CA **trindustries.com**.

The time to renew is upon us

Executive Director Jennifer Towner reminded members that it's time to renew their membership if they haven't done so already. Renewals were due July 1 for the 2019-20 fiscal year.

Renewal is easy: Checks can be mailed to the ICPA address or payment can be made through the "Join Today" link on the ICPA website: http://theicpa.com/join-today/

"The association accomplished a great deal this year, and it will only continue to grow and strengthen with a strong membership. Every member is valuable and essential to our success," Jennifer said.

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Where is the fourth industrial revolution heading?

Most business leaders today are looking at the fourth industrial revolution with "measured optimism," according to a recent report from the Manufacturing Institute. The report, "Navigating the Fourth Industrial Revolution to the Bottom Line," is based on a nationwide study by PwC

The report says that 73% of the nation's manufacturers expect to invest in some form of smart factory technology over the next year. It also reports that while there are many fence-sitters, most are giving digital investment priority: 31% say adopting an Internet of Things (IoT) strategy is "extremely critical" while 40% say it's "moderately critical."

Specifically, the report found:

- By far the most widely deployed technology is robotics, which saw 65% of respondents investing in new applications in that area in the last three years. That compares to 37% who invested in 3D printing, 35% who bought into advanced analytics and 31% who have put money into IoT.
- The main factor holding back robotics currently is skill level: 70% of manufacturers say that the most significant impact of robotics on the workforce in the next five years will be an increased need for talent to manage the more automated productions environment.
- About 80% of manufacturers say they will deploy sensors in their operations in the next three years.

Oct. 4 is Manufacturing Day

Organizations devoted to the manufacturing industry, factories and other industrial companies join educators, teachers and parents on Manufacturing Day to celebrate the fact that industrial plants can offer great careers to up-and-coming students.

This year's event, which is organized by the National Association of Manufacturers, is Oct. 4. On that date, companies all over the U.S. will host special events that involve

schools, their communities and their plants with the purpose of amplifying the voice of individual manufacturers to address opportunities that exist in industry as well as other issues industry shares.

Events range from tours of facilities to career days within schools to showcasing of the latest manufacturing technology. Parents, students and educators join company officials in planning and carrying out what happens that day.

For information, go the www.mrgday.com.

2020 may see slower remodeling

Gains in spending on improvements and repair to homes will decelerate through early next year, according to the Leading Indicator of Remodeling Activity (LIRA) by the Joint Center for Housing Studies, Harvard University. The LIRA forecast a slowdown from 7% year over year growth presently to about 2.6% in the first quarter of 2020.





Harvard blamed the slowdown on cooling house price gains, sales activity and remodeling permitting. The center also pointed out, however, that home improvement and repair have been in an extended period of above-trend growth for several years because of weak homebuilding, aging homes and other factors.

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