

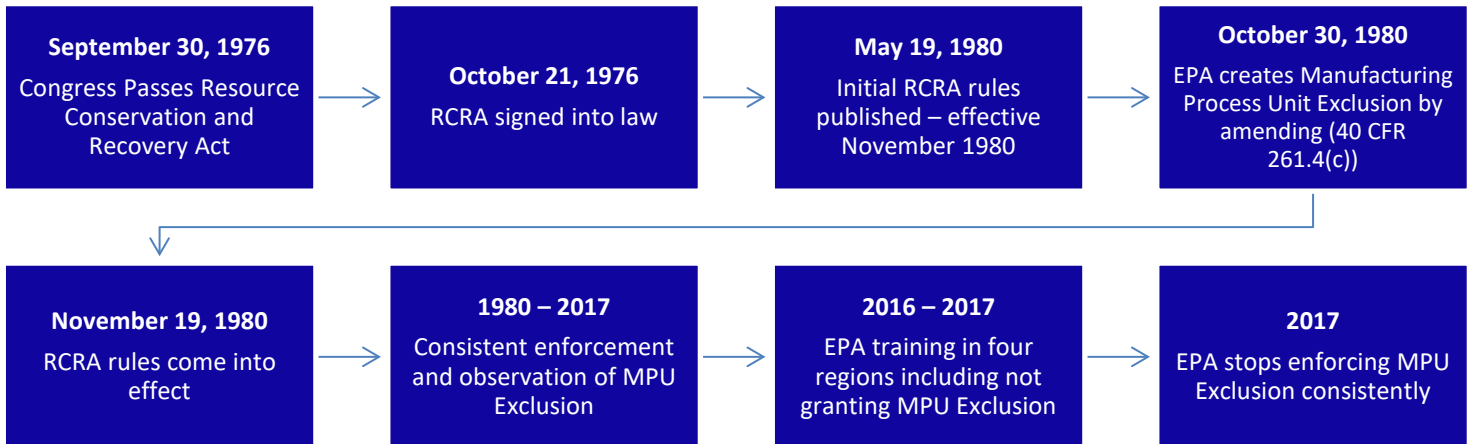
**SOCMA POLICY PRIORITY:  
MANUFACTURING PROCESS UNIT EXCLUSION**



**What is the Manufacturing Process Unit Exclusion (MPU Exclusion)?:**

A regulatory exclusion that is used daily across the chemical industry, excludes specific equipment in the manufacturing and processing of chemicals from unnecessary regulation under the Resource Conservation and Recovery Act’s (RCRA) hazardous waste regulatory program because materials contained in that equipment do not pose a substantial hazard to human health or the environment.

**MPU Exclusion History:**



**Problems with EPA Not Granting MPU Exclusion:**

\$3-5 million to bring one plant into compliance	Inconsistency in enforcement from region to region
Facility shutdown	Significant cost to retrofit facilities
Employee layoffs and furlough	Physical impossibilities of compliance
Lost production	Harms competitiveness in global market
Specialty chemical facilities cannot shift product to a different production line	EPA deciding winners and losers and creating imbalance in competition

**What Can EPA Do to Ensure the MPU Exclusion is Preserved?:**

SOCMA requests a public statement from EPA in the form of a letter or other medium which states that:

1. The MPU Exclusion should be enforced as it has for almost 40 years
2. Aberrations in enforcement in the past 18 months are incorrect applications of the regulation
3. Current enforcement actions will be dropped

## DIAGRAM OF A MANUFACTURING PROCESS UNIT

