

## CHEMICAL MANUFACTURERS ASSOCIATION

## Health and Safety Committee

## Meeting Minutes

CMA, Terrace A & B Conference Room  
2501 M Street, NW  
Washington, DC 20037

Wednesday  
August 17, 1988  
9:30 a.m. - 2:45 p.m.

Members Present

Wallace F. Dyste  
Janice D. Florin  
Joseph E. LeBeau  
Thomas J. Marriott  
Michael M. Marshall  
James H. Price  
James H. Senger  
David D. Sigman  
Gary A. Sunshine  
Gary L. Ter Haar  
Ronald Van Mynen  
Frank A. Ubel  
John Willett

Company

Dow Corning Corporation  
Amoco Corporation  
The Dow Chemical Company  
Air Products & Chemicals, Inc.  
Lonza, Inc.  
Quantum Chemical Corporation  
Monsanto Company  
Exxon Chemical Company  
ICI Americas, Inc.  
Ethyl Corporation  
Union Carbide Corporation  
3M Company  
Shell Oil Company

Members Absent

Harry A. Eschenbach  
Leon C. Schaller

W. R. Grace & Company  
E. I. du Pont de Nemours & Company

CMA Staff

Susan Conti  
Nancy Doerr  
Marion Herz  
Joseph Kelley  
Diane Layne  
Timothy O'Leary  
Lori Ramonas  
William Royce  
Randal Schumacher  
Sandra Tirey  
Eileen Winkelman

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1. G. Sunshine, Chairman, convened the meeting at 9:30 a.m. The committee approved the minutes of the July 20 meeting with the following change: item 12 should read "The committee conditionally..."

2. Report of the Steering Task Group

The Steering Task Group recommended that the committee periodically meet for a day and a half and include an overview report on significant OSHA and TSCA trends, strategies, programs and issues. Goal 1 and 3 managers will be responsible for organizing the OSHA and TSCA portions of the committee meeting. The committee agreed to try the expanded meeting schedule beginning October 18-19.

The committee agreed to meet with EPA to discuss TSCA "core" set testing possibilities. The committee asked the Hazard Assessment Task Group and the TSCA Reauthorization and Transition Task Group to meet and jointly prepare agenda items for the EPA/CMA meeting before the next HSC meeting.

The next committee planning meeting is scheduled for May 10-12 in Annapolis, Maryland.

3. Outside Services Budget

The committee approved outside services funds for:

- joint government-industry workshop on non-animal alternatives to the Draize test (\$1,000)
- cost overrun to print the CAER Progress Report (\$2,000)

The committee denied the Health Programs Task Group's (HPTG) request to fund outside speakers for its Fall planning meeting. Committee members will speak with their respective HPTG members and the chairman to suggest topics for the meeting agenda.

Sponsors will provide R. Schumacher with estimates on funds that are expected to be paid in FY 88/89 for specific line items.

4. Chemical Release Inventory Task Group Charter and Mission

Committee members approved the mission, charter and objectives, and asked the task group to report back to the committee with further details on responsibility for the various proposed projects.

5. Exposure Assessment Initiative

The Exposure Assessment Task Group (EATG) is withdrawing the proposed Chemical Exposure Assessment Initiative, which it earlier thought could become part of the ERIC program. Since the scope and length of the ERIC program has been reduced to a one-year pilot project, the Initiative will be conducted, as outside service activities, by EATG.

6. Process Safety Management Policy

The committee approved the version of the process safety management policy prepared by the Safety Programs Task Group, as modified, and

will recommend the policy to the Board of Directors (BOD) at its September meeting. Committee members were asked to make sure their company representatives on the BOD were briefed and supportive of this and the other HSC items on the Board's agenda. R. Schumacher will send committee members copies of the HSC related Board tab items to facilitate briefing of committee executive contacts.

7. Pilot Information Exchange Project on CEVs

The committee was briefed on the CMA Officers' modifications to the proposed project, including: 1) no longer referring to it as a clearinghouse; and 2) inviting BOD members to provide community exposure values (CEVs) to CMA. This will be presented to the BOD for information at its September meeting.

8. Alternative Language to Title V of the Clean Air Act

The committee approved the alternative language as a fallback position to its preferred position, approved at the November 1987 committee meeting.

9. Warehouse Safety Policy

The members approved the proposed CMA policy for the storage of chemicals, agreeing to delete the word "hazardous" in the title and the third burger dot. M. Marshall will join a work group meeting on August 25 to help complete the review of the guidelines document, which will be recommended to the BOD for approval after the September meeting.

10. OSHA's Proposed Health and Safety Management Guidelines

The committee agreed that CMA should ask OSHA for an extension of the comment deadline in order to provide the Agency more thoughtful comments. The committee agreed to submit the existing comments with some revisions if OSHA does not grant CMA the extension.

11. OSHA PEL Update

The committee agreed to send a letter to the administrative law judge overseeing the permissible exposure limits (PEL) update, supporting OSHA's appeal and request for a more expedited post hearing briefing schedule.

12. ANSI MSDS Standard

R. Symuleski reviewed, with the committee, efforts of the Product Safety Task Group concerning MSDS uniformity. The task group recommended development of a consensus standard under the auspices of the American National Standard Institute (ANSI). The committee agreed that CMA should inform ANSI that CMA would like to develop MSDS guidelines and subsequently an ANSI standard, provided that CMA can serve as the Secretariat. R. Roland, president of CMA, will inform the BOD of the proposal at its September meeting.

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13. Electronic Distribution of MSDSs

The committee agreed to join the Distribution Committee in recommending to the BOD a proposal to develop the capability to transmit MSDSs by facsimile to responders and in emergency situations. Members agreed to recommend a special appropriation for establishing this capability.

14. Manual on Risk Communication

Committee members were provided copies of a proposal from Rutgers University to prepare a manual for CMA on risk communication. The committee was asked to provide R. Schumacher with comments, by August 26, on whether to fund the proposed project.

15. Board Health Effects Committee Review of HSC

The Board Health Effects Committee has been assigned the responsibility of reviewing the performance of the Health and Safety Committee. Goal managers will review their goals and programs with the Board Health Effects Committee on November 1.

16. S. Conti conducted a lecture on how Anti-trust laws affect legal advocacy by trade associations.

17. EPA TSCA Section 8(d) Issues

The Notification and Reporting Task Group (NRTG) will review and comment on EPA's draft Q & A document addressing various TSCA Section 8(d) reporting issues. Task Group representatives will meet with the Agency in September to discuss additional Section 8(d) issues. The task group will prepare examples on how EPA's guidance would be applied and will try to clarify EPA's enforcement/amnesty policy under the Q & A interpretation of Section 8(d) reporting requirements.

18. January 1989 HSC Meeting

The committee will meet on January 25 instead of January 18.

19. CAER/Title III Coordinators Meeting

On November 10-11, CMA will sponsor a meeting for CAER/Title III Coordinators in Washington, DC.

20. 3rd Annual Product Safety Conference

The 3rd Annual Product Safety Conference will be held on October 5-6 in Washington, DC.

21. CAER Coordinators

HSC members were asked to check with their CAER Coordinators to make sure the CMA CAER and Title III materials are being distributed to individual facilities.

22. Adjournment

The meeting adjourned at 2:50 p.m.

A handwritten signature in cursive script that reads "Randal P. Schumacher". The signature is written in dark ink and includes a long horizontal flourish extending to the right.

Randal P. Schumacher  
Director  
Health, Safety and  
Chemical Regulations

Minutes Subject to Approval  
8/19/88

RPS:dl