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Sent: Wednesday, February 4, 2004 6:05 PM (GMT)
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Subject: FW: A message from Red Cavaney about API's 2003 accomplishments - Shanghai Included
Attach: API_2003_HIGHLIGHTS.pdf; 2003 Accomplishments.ZIP

In the word document below on page 3, highlighted in yellow is the update on the Shanghai Health Study that was included in the API 03 accomplishments.

Regards,
Patsy

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-----Original Message-----

From: Glen Barrett [mailto:barrettg@api.org]
Sent: Wednesday, February 04, 2004 10:18 AM
To: Chris Arend (E-mail); Chris Cox (E-mail); Clay Freeberg (E-mail); Erik Milito; Hand, Herb SOPUS; Jan L Laughlin (E-mail); Jeff Mojcher (E-mail); Jenny Yang (E-mail); Jim Metzger (E-mail); John N. King (E-mail); Lakeisha Harrison; Lewis R. Schoenberger (E-mail); Mark Saperstein (E-mail); Milind Bhatte (E-mail); Peter Baltais (E-mail); Ralph Colleli; Armstrong, Randy R SHLOIL-CA; Rees Madsen; Robert Hermanson (E-mail); Tom P. Yarnick (E-mail); Walter Retzsch; Craig Parker (E-mail); Snyder, David B SOPUS; Diana Samples-Caudill (E-mail); Donna Carvalho (E-mail); Elizabeth King (E-mail); Fred Reitman (E-mail); Karen Jones (E-mail); Hulse, Michael SCC-CHSEMH; Clegg, Patsy M SCC-CHSE-PC; Paula Ignat (E-mail); Richard Clark (E-mail); Robert T. Plutnick (E-mail); Steve Bowes (E-mail)
Subject: FW: A message from Red Cavaney about API's 2003 accomplishments

Attached is a PDF copy of API accomplishments in 2003. Also attached are 2003 accomplishments RASA listed in the EHS Alert Newsletter.

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-----Original Message-----

From: Howard Feldman

Sent: Monday, February 02, 2004 4:54 PM

To: RASA

Subject: FW: A message from Red Cavaney about API's 2003 accomplishments

-----Original Message-----

From: Howard Feldman

Sent: Monday, February 02, 2004 4:53 PM

To: 'hesgc@listserve.api.org'

Subject: A message from Red Cavaney about API's 2003 accomplishments

HESGC:

2003 was an challenging and eventful year for our industry. I am pleased to provide you with the attached glimpse of some of the highlights of the year for industry as a whole. Additionally I have attached EHS specific highlights in a second document.

Please contact me if you have any questions.

Howard

Howard J. Feldman

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Major RASA Achievements of 2003

Climate

API worked with a joint international industry task force to successfully complete, on schedule, the Petroleum Industry Guidelines for Reporting Greenhouse Gas Emissions (GHG). The Guidelines offer practical help to oil and gas companies in reporting their GHG emissions globally, but they also provide significant strategic advantage for the industry.

API staff presented/wrote/published several papers and participated on expert panels, at both national and international conferences, disseminating API's GHG Compendium and IPIECA Guidelines, to promote the use of the Compendium and Guidelines for estimating and reporting world-wide GHG emissions for the industry.

New Source Review

Following years of API and other stakeholders' advocacy, EPA promulgated favorable revisions to the Equipment Replacement exclusion under the New Source Review permitting program on October 27, 2003. The revision enables facilities to replace old equipment with similar, more efficient equipment without triggering NSR permitting, as long as certain criteria are met. (The rule has since been stayed pending the completion of judicial challenges.)

NAAQS

As a result of efforts by API and other stakeholders, EPA has delayed completion of the technical support document for the Particulate Matter (PM) air quality standard until April 30, 2004, so that numerous technical flaws can be adequately addressed. This will serve as the scientific basis for EPA's re-evaluation of the PM national ambient air quality standards (NAAQS).

As a result of API advocacy efforts, on October 21, 2003, EPA reopened the comment period for the 8-hour ozone implementation rule to accept comment on methods to provide more time for non-attainment areas to achieve the new ozone standard. API continues to argue for sufficient time to realize the benefits from existing national emissions reductions rules before attainment deadlines are due.

API successfully completed a study "Understanding the Effectiveness of Precursor Reductions in Lowering 8-Hour Ozone Concentrations in the Eastern United States." This study was presented to other organizations, EPA Senior Management and staff to bolster our arguments that EPA has a problem because states will not be able to demonstrate attainment with the ozone standards. As a result, EPA offered to consider our alternate form of the ozone standard when developed.

Air Toxics

API commented in response to EPA changes in the proposed Organic Liquids Distribution MACT rulemaking. As a result of these additional API comments, upstream operations and petroleum product pipeline and terminal operations are excluded in the final OLD MACT rule.

Tanks

API formed and led the broad-based SPCC Industry Coalition to address a poorly-crafted EPA final rule that regulates oil spill prevention and control at industrial facilities. API and the SIC immediately sought an extension of the deadline for the SPCC rule. In April, EPA published a final rule extending the compliance dates for the SPCC rule by 18 months. The granting of the extension provided the agency time to address problems with the rule and provided the regulated community with additional time to update SPCC plans and address secondary containment needs.

Right to Know/Reporting

Because of API's efforts, EPA rescinded major changes to their new proposed Form R, the form required for reporting for the Toxics Release Inventory (TRI). The form was reduced in length by 89%, which greatly reduced the reporting burden for industry. However, EPA retained changes on the form that distinguished between waste disposal and release, which API advocated.

Due to successful advocacy by API, EPA finalized revisions to TSCA Section 8(e), Notification of Substantial Risk in June 2003. Guidance had been unclear and confusing since EPA's original policy statement of 3/16/78 concerning reporting. The revisions will save time and money when reporting substantial risk in the future.

Groundwater

API staff led a successful rebuttal of EPA MTBE Analysis Guidance. EPA Office of Underground Storage Tanks had published draft guidance for groundwater MTBE analysis that suggested that existing analytical methods were generating inaccurate results. The proposed alternative sample preservation and analytical techniques that would have been much more costly and would have cast doubts on the quality of all existing data. EPA's final analytical guidance reflected most of API's concerns, avoiding potential new costs (estimate up to \$20 mil/yr avoided costs to API members).

API successfully developed an MTBE research collaboration with the NY State Dept. of Envir. Conservation and the US Geological Survey focused on documenting MTBE & TBA biodegradation. API's \$100k will be highly leveraged with resources of the USGS and the NY DEC. The New York collaboration is especially beneficial as the regional NY DEC cleanup manager has been quite conservative during the last several years, requiring very expensive remediation.

Since May 2003, over 15,000 copies of Answers to Frequently Asked Questions About Managing Risk at LNAPL Sites (Soil and Groundwater Research Bulletin no. 18) were downloaded. Over 750 printed copies have also been distributed.

API submitted comments on the draft EPA Vapor Pathway guidance. Our advocacy has, so far, kept the guidance from being applied to UST sites. Issues raised by API and others have caused EPA to reconsider some technical points as well.

Water

When EPA failed to issue its construction storm water general permit prior to the designated compliance date under the Phase II storm water rule, the compliance status of storm water discharges from construction activities at refineries and terminals was unclear. API advocacy led EPA to exercise its enforcement discretion and expedite issuance of the subsequent permit.

In collaboration with API downstream and federal relations staff, held discussions with EPA concerning the possibility of effluent guidelines for terminals. Discussions led to EPA realization that pollutant loadings from terminals are insignificant and to discontinue further consideration of terminals for possible effluent guidelines.

The Dept of Homeland Security had planned to develop a "National Response Plan" that would have significantly altered the oil spill response program we currently have in place. However, thus far, we have worked closely with the US Coast Guard to successfully convey our message to DHS and convince them that our industry has a robust response system in place and so does not need significant restructuring.

API advocacy helped establish the new Spills of National Significance (SONS) program. These drills are extensive four to five day drills jointly designed and run by industry and government. In the past, there has been one industry representative per SONS. We have convinced the USCG that these exercises would be more appropriate with multiple industry partners per exercise, which allows leverage of member resources.

Safety

API successfully managed the development of a new API Individual Certification Program covering petroleum storage tank entry supervisors. This was an intense project including program justification; coordinating industry outreach and participation; developing program and test examination requirements. This new program will enhance industry advocacy efforts and minimize potential for new or expanded regulation covering tank entry and maintenance operations. It will help ensure that qualified tank entry services are available to API member companies and it will help reduce potential of tank entry related accidents.

Security

API successfully completed new editions of the API Security Guidelines Document and the API/NPRA Security Vulnerability Assessment Methodology. Both documents are used to advance our security advocacy efforts by demonstrating voluntary industry responsibility. Specifically, both documents have played a key role in helping to minimize onerous security legislation focused at the Chemical and Petroleum Industries.

Health

API coordinated and participated in technical negotiations with EPA on the scope of mandated exposure research that resulted (finally) in formal EPA approval of the Clean Air Act Section 211(b) exposure protocol and managed the exposure studies. These studies are designed to show that fuels in use are causing minimal adverse health exposure.

API staff worked with Benzene Health Research Consortium Oversight Committee and API executive staff to satisfactorily resolve funding issue for the Shanghai Health Study.

In August 2003, the first Shanghai Health Study (SHS) Annual Meeting was held. This was the first time that Chinese and American principal investigators, independent review panel members, and company sponsors were together to engage in face-to-face scientific dialogue. An official launching ceremony was held on December 9th in Shanghai to commemorate the opening of the diagnostic laboratory, acceptance of cases, and support by local Chinese officials and medical community.

API coordinated the development and submission to EPA of robust summaries and test plans for petroleum materials contained in eight chemical categories sponsored in the High Production Volume Chemical program. The submissions represent a major accomplishment for the Petroleum HPV Testing Group and petroleum industry; robust summaries and test plans have now been submitted for over 90% of the approximately 400 materials sponsored by consortium.

API organized a joint Industry and Department of Defense (DoD) toxicology workgroup to determine immune effects of inhaled kerosene jet fuel vapors and aerosols. API leveraged its funds with significant Navy and Air Force contributions to support comprehensive toxicology studies in two rodent species. This team project will provide greater regulatory credibility by including government stakeholders and by generating more data in two test species.