

New.
File:
Associations:
CMA
284

TGG
Comments, questions on
attached.
gslc

TO: Environmental Coordinators

FROM: T. G. Grumbles
DATE: February 8, 1989

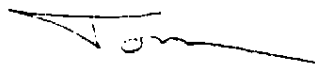
Interoffice
Communication

SUBJ: PROPOSED CMA RELEASE REDUCTION POLICY AND PROGRAM

VISTA

Attached is material regarding a release reduction policy being proposed, or formulated, by CMA. A briefing meeting is being held March 1 in Washington to present the attached and begin receiving member company comments.

Please review the attached and let me know if you have comments on the attached drafts and/or would like to attend the meeting. I plan to attend the meeting. Please give me any comments by February 24.


T. G. Grumbles

dlj
.520

Attachment

cc: Plant Managers - R. W. Seymour-ABER, L. R. Bauer-BALT, G. D. Williams-BLANE, J. B. Maher-HMD, J. Friend-LCCP, J. W. Ware-LCLAB, R. A. Conrad-LCVC, H. D. Garrison-OKC, P. L. Foote-PREM
J. A. DeBernardi, T. H. Huffman, R. D. Gamblin

No, "industrial" part of it
is well covered
and direct
Does it refer to the industrial
portion of the release reduction
program to be it then?
Or is this saying present CMA budget
will be directed in this direction
& other programs be merged??



CHEMICAL MANUFACTURERS ASSOCIATION

January 30, 1989

TO EXECUTIVE CONTACTS OF CMA MEMBER COMPANIES

Dear Executive Contact:

Subject: Member Company Comments on Proposed CMA Chemical
Release Reduction Policy and Program -- March 1, 1989 Briefing

The purpose of this letter is to urge the attendance of your senior environmental, health, safety and legal managers at a March 1, 1989, briefing on a proposed major new CMA program concerning Title III, Section 313 releases. The proposed program encourages CMA member companies to increase their efforts to reduce releases to the environment and to increase the understanding of health effects from these releases. Public policy debates on Section 313 release inventories are anticipated to gain momentum when EPA releases its computerized inventory later this year. This new program will position the industry in a positive light for any follow up debates.

The proposal is the product of an intensive six month process involving health, safety, environmental, government relations, legal, and communications experts from the member companies, with careful oversight by the Executive Committee and Board of Directors. The proposed voluntary policy and programs, built upon CMA's existing air quality policy and waste minimization program, are crafted to respond to immediate public concerns focused on the Section 313 release reports and to demonstrate industry leadership. To assist you in preparing for the briefing, I am attaching a copy of the proposal. Please treat these materials as confidential.

CMA's Environmental Management Committee will evaluate comments and make revisions over the next two months and make a final presentation to the Board of Directors in April. The March 1 briefing is designed for senior environmental, health and safety, and legal managers, to review the proposed policy and program, discuss the relationship to other CMA initiatives, its implementation, communication strategy, impact on local operations, and to provide opportunities for attendees to ask questions. A tentative agenda is enclosed. The briefing will be held at the Ramada Renaissance Hotel, 1143 New Hampshire Avenue, N.W., Washington, D.C. (202) 887-0800 beginning at 9:00 a.m. A block of rooms has been reserved for those who will arrive the night before. (When making reservations refer to RR #392. The cut off date is February 15, 1989.)

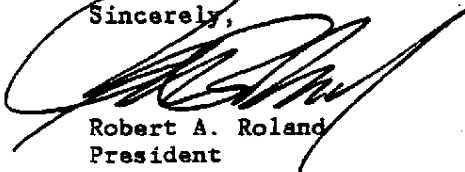
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Executive Contacts
January 30, 1989
Page 2

To assure that all member companies will be accommodated at the special briefing, I am requesting that you designate no more than two representatives to attend. I would appreciate your contacting David W. Carroll's office (202/887-1185, Ms. Stephanie Henry) to advise who your representative(s) will be for the March 1, 1989, meeting. We ask that each attendee bring a check made out to CMA in the amount of \$30.00 to defray the costs for continental breakfast, coffee break, and the meeting room.

If you have any questions on this matter, please contact David W. Carroll, Director, Environmental Programs, (202) 887-1164 or Ann M. Mason, Associate Director, Environmental Division (Air Programs), (202) 887-1180.

Sincerely,



Robert A. Roland
President

Attachments

cc: Environmental Management Contacts
Health and Safety Contacts
Responsible Care Coordinators
Title III Contacts
CAER Coordinators
Legal Contacts
Washington Offices
State Contacts

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TENTATIVE AGENDA
PROPOSED CHEMICAL RELEASE REDUCTION POLICY AND PROGRAM
BRIEFING

MARCH 1, 1989

7:30 - 9:00 a.m. Registration and Continental Breakfast

9:00 Introductory Remarks - R. A. Roland, President, CMA

9:15 Section 313 Impact and CMA's Responsible Care Program -
J. Holtzman, Vice President-Communications, CMA

9:35 Draft CMA Chemical Release Reduction Policy - C. T.
Seay, Chairman, Environmental Management Committee

9:50 Questions and Answers

10:15 Break

10:30 Programmatic Support Proposals

- Regional Monitoring and Modeling - R. Bradford,
 Leader, ad hoc Chemical Release Reduction Group
- Health Effects Evaluation Program - R. Van Mynen,
 Vice Chairman, H&SC
- Smaller Company Assistance - R. Bradford
- Communications Program - J. Holtzman

11:15 Questions and Answers

11:40 Concluding Remarks -- C. T. Seay

11:45 noon Adjournment

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CHEMICAL RELEASE REDUCTION POLICY

CMA will promote, among its member companies, practices that protect the safety and health of employees and residents of communities in which they operate. Our industry's goal is to assure that employees and communities are not adversely affected by our operations and to encourage others, including our suppliers and customers, to achieve the same goal.

CMA understands the public concern regarding health effects from releases into the environment. CMA also believes better information on the effect of these releases is needed to assure fully informed action by government, industry and the public. CMA member companies will increase their efforts to reduce releases to the environment and to increase the understanding of health effects from these releases. Existing industry activities will be consolidated to bring focus to this effort so that the industry's performance will be improved and the industry's margin-of-safety will be increased.

This CMA policy, recommended for implementation by each member company at each of its operations, includes the following elements:

- 1) Using SARA Section 313 reports as a base, inventory existing releases to all media. Chemicals other than those covered by Section 313 will be included as appropriate.
- 2) Establish priorities for the inventoried releases based on factors including their potential impact and the level of community concern.
- 3) Formulate a release reduction plan, based on this ranking, to increase the current margin-of-safety, increase operation efficiency, and address areas of public concern. In the plan, transferring releases from one media to another should be used only if the overall volume, toxicity, and environmental impact is reduced. Reductions may be achieved by any of the following methods, but it is recognized that such reduction efforts are listed in declining order of desirability and member companies will direct their efforts accordingly:
 - i) Source reduction.
 - ii) Recycle/Reuse.
 - iii) Treatment to reduce volume and/or toxicity before release or disposal.
- 4) Initiate a system to report release reduction progress.
- 5) Communicate overall plans and progress to employees and the public.

In addition, to increase understanding of the efforts of chemical releases, CMA will work to better determine the concentrations of chemicals in the environment and the health effects of such chemicals. Finally, in implementing all of the above, CMA will foster assistance to smaller plants and companies.

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REGIONAL MONITORING AND MODELLING PROJECT

PROJECT BACKGROUND

The public perceives that no measurement data exists on Section 313 chemicals released to the air, surface water, or groundwater. Therefore, they believe "toxics" are a health threat. Limited monitoring data indicate that there are very small concentrations of chemicals in communities. EPA and others have indicated that the general air quality is improving. The objective of this project is to proactively obtain more data to confirm that Section 313 chemicals generally do not pose a risk to communities. In addition, it designed to achieve a secondary benefit of getting ambient data systems in place to monitor progress. The project proposal focuses on air issues as the initial priority with possible subsequent phase in of surface and groundwater programs to ensure a multi-media perspective. Whe

The project will provide for data collection using regional air dispersion modelling to predict hotspots and optimize the location of a minimum of five to ten monitors per sampling location. Five to ten target regions are recommended as the minimum level of effort.

OPTIONS CONSIDERED

Three programmatic levels of activity were considered. The first alternative is a base case that supports Options 2 & 3. Option 2 places the local CIC's in the leadership position but the bulk of the total cost still must be assumed by the local industry. Considering CMA's budgetary constraints, this is the recommended option. Option 3 creates a new area of activity for CMA, and carries a high pricetag, although it delivers the maximum leverage, visibility, and credibility.

1. Base Case

Gather available data into a central reference system (e.g., Houston Regional Monitoring Network data, Bay Area Air Toxics Study, EPA indoor air study, and volunteer data acquisition by member companies). This central reference system on monitored data can be supplemented with a CMA regional dispersion model and a CMA regional sampling protocol. Development of the modeling/monitoring protocols will cost about \$50,000. Protocols can be developed by contractors by June-1989. The data gathering effort will cost approximately \$50,000.

2. Proactive CIC Activity

Replicate the Houston Regional Monitoring project, or modified approaches, in priority areas through CMA leadership. Local programs will be conducted by consultants with local industry financial support and technical direction. This option places the entire financial and manpower burden on local industry and is probably limited to those

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areas with existing, active CIC's. Data gathered in this way may have less credibility because the public perceives that it is "industry" generated rather than a cooperative effort lead by community leaders.

The total costs from local industry for significant modelling/monitoring programs typically will be in the range of \$500,000 to \$1 million per region per year. Top down management support from CMA member companies will be necessary to establish regional monitoring programs under this option.

3. Proactive CMA Activity with Economic and Manpower Leverage

*Will want to do
to normal business
of these organizations*

Using the Houston Regional Monitoring Network as a working model, CMA can offer matching grants and technical assistance to state and local agencies, CIC's, or foundations and commissions to establish and carry out regional air monitoring programs keyed around significant 313 releases. Funding will be leveraged and industry will be visibly involved in assuring valid data collection for programs proposed by the local communities. Under this option, CMA will cover at least a third and possibly more of the total cost for at least the initial year. CMA's direct cost will be approximately \$1 to \$3 million dollars for the initial year.

*CMA doesn't have
any \$, it comes
from members*

MULTIMEDIA TOTAL PROGRAMS

Groundwater and Surface Water programs can be introduced on a delayed time line.

1. Groundwater

*Are not all
industries already
working on ground-
water remediation?*

Support state wellhead protection programs through partnerships with local government. Local industry might provide data and technical expertise, i.e., temporary locals of hydrogeologists, for example, as well as grant money for groundwater monitoring within the wellhead protection program. This program is not currently funded at the Federal level, yet the States are anxious to protect their public water supply as suggested in the 1986 Safe Drinking Water Act Amendments.

2. Surface Water

Provide grants to organizations, such as, the Chesapeake Bay Foundation, The Mississippi River Coalition. Surface water quality could be monitored in the immediate area of member-company facilities to supplement State monitoring efforts.

Why?

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SUPPORT INFORMATION FOR REGIONAL MONITORING MODELLING

1. Target Areas for Regional Modelling/Monitoring

Houston, TX
Baton Rouge, LA
Greater New York/New Jersey
Philadelphia, PA
Buffalo/Niagara Falls, NY
Bay Area District, CA
South Coast (Los Angeles) District, CA
Chicago, IL
Klamath Valley, WV
Washington, DC (control)

*Very interesting, but
doesn't impact Vista?
Seems to me local folks
aren't interested in results
from somewhere else to this
they're O.K.*

2. Houston Regional Monitoring Experience

The Houston Regional Monitoring Corporation (HRM) was formed in 1979 by local area businesses to obtain ambient air monitoring data for the criteria air pollutants. Eleven (11) monitoring stations were established. The primary purpose of HRM was to enable companies to satisfy Prevention of Significant Deterioration (PSD) permit application requirements.

Since its inception, the focus of data collection and analysis has shifted to meet changing needs. Collected ozone data, in particular, has been very useful to industry and the State in evaluating air quality, the effects of various emission sources and controls, and the significance of monitor placement.

In 1987, the HRM's focus was expanded to include collecting ambient air concentration data for about 170 specific chemicals, including many SARA Section 313 chemicals of concern. Samples are obtained for a 24-hour period every sixth day at six existing monitoring stations covering about 900 square miles. This monitoring is intended to assess long-term community exposure to these substances in outdoor air.

During each sampling period, a 15-liter canister is filled at a rate of 6 cc/min, and then the canister is transferred to the Radian Corporation for analysis. Extensive QA/QC procedures are employed. Meteorological conditions are recorded for each site to support assessments of the data. The cost of this targeted monitoring is approximately \$80,000-100,000/station/year.

The monitoring stations are operated by Radian Corporation, and the entire HRM effort is supported by member-company contributions of about \$50-\$60 per manufacturing employee.

3. Baton Rouge Area Ambient Air Monitoring

In early 1988, several companies in the Baton Rouge, LA, area initiated an effort to better understand the ambient air quality in the Baton

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Rouge area and the effect of emissions on air quality. The effort included short-term ambient air sampling and analysis by Radian Corporation and modeling by Trinity Consultants. The total cost is expected to be approximately \$130,000.

Monitoring consisted of the collection of 24-hour composite samples at four (4) locations for three (3) consecutive days at each site and included significant QA/QC procedures. Total cost for the 12 samples, analyses, and QA/QC, including setup of the temporary monitoring station, was \$65,000. The sampling and analytical procedures were the same as for the ongoing NEM project.

Modeling consisted of dispersion calculations for the emissions of 17 substances from 13 area facilities. In addition, the GEMS model was used to estimate exposure and risk in the area for two of the substances. Total cost of the modelling effort is about \$65,000.

On-site personnel involved in the interpretation and use of the monitoring and modeling data with interested public consider the monitoring data to be most believable and, therefore, the most useful.

Petrochemical Complex Monitoring (Tubes)

In early 1988, enhanced Industry Hygiene (IH) collection tube monitoring techniques were used to obtain ambient air quality data for eight VOCs in the vicinity of a major petrochemical complex. The enhanced techniques were capable of quantifying low ppb concentrations of the substances.

Sampling was conducted at eight locations with seven 48-hour composite samples obtained at each location over a three-week period. Total cost for sampling, analysis, and QA/QC was \$50,000.

Based on the success of this effort, the same technique has been employed at other locations.

Dispersion modelling is now being initiated in the area to estimate the ambient contribution at 400 receptor locations of ten chemicals. From 200 emissions sources at five facilities, the modeling cost is estimated at \$25,000.

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OPTIONS FOR COMMUNITY
HEALTH EFFECTS EVALUATION PROGRAM

BACKGROUND:

The Ad Hoc Chemical Release Reduction Work Group, and the Health and Safety Committee have developed eight options for responding to the public's concern about exposure to chemical releases. These options are presented to help identify the most beneficial course of action for implementing this program element.

Evaluating the effect of chemical exposure on community health is central to addressing the public's concern about chemical releases. Clear and widely accepted methods to identify acceptable levels of exposure are essential to explain the meaning of Title III, release reduction, and waste minimization data.

After a discussion of all options, the consensus of the Ad Hoc Work Group, and the Health and Safety Committee focuses increasingly on CMA sponsoring the development of consensus methodology(s) at an organization such as CIIT. (See Options 3 and 6 below.) The cost of pursuing this option is approximately \$250,000. The longer term application of the consensus method(s) by other groups to a wide variety of substances entails additional costs.

PROGRAM DESCRIPTION:

The Community Health Effects Evaluation program seeks to identify methods to characterize exposures of the general public to chemicals. The effort will work to identify existing methods to determine safety, and to improve the existing state of science in determining safety. Moreover, the program will work to improve the public acceptability of the measures used to judge safety. *Good luck!*

PROGRAM OPTIONS:

Options considered for the program are listed in their order of resources required:

Option 1: Encourage Government Action.

Safety is a matter of public perception and acceptability. Industry's activities will always be suspect and CMA should encourage government regulatory agencies to set safety standards. Until standards are set, industry will use existing measures to judge safety and explain these to the public.

Seems dangerous unless they'll set them based on political need & not data.

Option 2: Encourage Research.

Industry could encourage research by government agencies and universities to improve methods by which to judge safety.

Seems like this should be first if any chance that stds. might be data based.

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Such encouragement will only be suggestions that this is a serious issue that needs attention.

Option 3: Fund Research.

Industry could fund research by universities, national laboratories or consultants to improve methods by which to judge safety.

Option 4: Build on CMA's Information Exchange for Community Exposure Values.

CMA could examine the community exposure values obtained through its information exchange program. Consensus areas could be identified, and a needs assessment and feasibility study could be done for future work in developing exposure values.

Option 5: Develop Consensus on Methodology(s).

Industry could further develop consensus on method(s) by which to establish community exposure values. The method(s) will not be applied to specific chemicals, but published in the scientific literature for use by individual companies or government agencies. The application of any method to specific chemicals will often require the development of additional data on that substance to form a scientific decision.

Option 6: Fund an Independent Organization.

The chemical industry could fund an outside organization, such as CIIT, to develop and apply a method for setting community exposure values.

Option 7: Industry Could Develop and Apply a Methodology for Setting Community Exposure Values.

An industry group could develop a method for setting community exposure values. This method and data on specific chemicals could then be turned over to a standard setting organization such as AHA, ACGIH, ASTM, or EPA.

Option 8: Fund an Independent Expert Scientific Panel to Develop and Apply a Methodology for Setting Community Exposure Values.

The chemical industry could fund an independent expert scientific panel, through a university research center or national laboratory, to develop and apply a consensus method for setting community exposure values. The method and values will then be made available to standard setting organizations.

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RESOURCE REQUIREMENTS

Costs: Costs will vary depending on the options selected. Costs range from nothing for option 1, to \$30,000 - \$50,000 for option 4, \$250,000 for options 5, 6 and 7, and \$600,000 for option 8.

Time: Depending on the options selected, implementation could take two to five years. The time required depends greatly on the resources devoted to the project. Option 8, for instance, will require 2 years while option 1 will depend on the speed with which regulatory agencies act. Options 5, 6, and 7 will require one year to develop consensus method(s) with additional time required for application to specific substances.

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ASSISTANCE TO SMALLER COMPANIES

PROJECT BACKGROUND

The member companies of CMA are committed to the successful implementation of both the letter and the spirit of Title III. However, many smaller companies are having a difficult time implementing key components (emergency planning, accident prevention, emission reporting, etc.) of the law. Poor performance by any company, small or large, may affect the many positive proactive measures made by CMA member companies. CMA member companies should provide technical assistance to their customers and smaller companies to enhance overall environmental, health and safety programs.

OPTIONS CONSIDERED AND RECOMMENDATIONS

The following options were considered to assist smaller companies with their environmental, health and safety programs. The sentiment of the work group is that an implementation strategy that combines several of these options will be the most effective.

1. Member companies will communicate to and provide direct assistance to smaller companies through existing product stewardship programs.

- Mail information packets
- Invite customers in for training
- Send technical service representatives out to customers

CMA will work with the Council of Chemical Association Executives, U.S. Chamber of Commerce, State Chemical Councils and other national organizations to develop communication pieces on technical assistance available to smaller companies and how to access the process. Approximate cost for CMA to implement the activity is \$10,000. Communications regarding technical assistance to smaller companies will begin in early May.

2. Member companies and CMA, possibly using contractors, will conduct on-site training for companies in the following areas:

- Waste minimization/release reduction principles and methodologies
- Process safety
- Emergency planning and preparedness
- Communicating with employees and the community
- Public health issues.

As an alternative, CMA and member companies will develop seminars/workshops on a regional/local basis to provide information on the key issues highlighted above. They will be highly participatory and hands-on. They will use case studies presented by experienced plant personnel. The seminars will partially pay for themselves,

*In all this help
stuff, who's
liable when
something occurs?
the helper, CMA, or the
company being helped??
no protection
for company.*

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although funds will be needed to develop guidance materials in some of the areas mentioned (approximately \$75,000). The workshops could be scheduled for late summer or early fall.

The seminar/workshops will be developed and co-sponsored by:

- Individual member companies
- State chemical organizations
- CMA/other trade associations
- Council of Chemical Association Executives.

3. Member companies could mobilize their retirees to provide many of the services listed above. There are many unknowns including personnel availability and interest, cost, and timing. Nevertheless, this option is worthy of further consideration.
4. CMA could establish a technical assistance hotline for smaller companies to call and request help. We recognize that each company requesting assistance will have different needs, pressures, and time constraints. The hotline could cost approximately \$170,000 per year (including staff) unless it can be consolidated into an existing CMA service. The hotline will begin operation in July 1989.
5. Establish assistance programs with key universities whereby undergraduate and graduate engineering students assist smaller companies in their waste minimization and release reduction programs. A team (3-4 students) could have a project (defined by the company) to work on for the semester. The final report will include ways to minimize waste/releases and operational costs, and maximize effectiveness of implementation plans. This process could be initiated through state chemical organizations. Projected costs are not clearly defined at this time.

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REGIONAL MONITORING AND MODELLING PROJECT

PROJECT BACKGROUND

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The project will provide for data collection using regional air dispersion modelling to predict hotspots and optimize the location of a minimum of five to ten monitors per sampling location. Five to ten target regions are recommended as the minimum level of effort.

OPTIONS CONSIDERED

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2. Proactive CIC Activity

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SUPPORT INFORMATION FOR REGIONAL MONITORING MODELLING

1. Target Areas for Regional Modelling/Monitoring

Houston, TX
Baton Rouge, LA
Greater New York/New Jersey
Philadelphia, PA
Buffalo/Niagara Falls, NY
Bay Area District, CA
South Coast (Los Angeles) District, CA
Chicago, IL
Kanawha Valley, WV
Washington, DC (control)

*Very interesting, but
doesn't impact Vista?
Seems to me local folks
aren't interested in results
from somewhere else to think
they're O.K.*

2. Houston Regional Monitoring Experience

The Houston Regional Monitoring Corporation (HRM) was formed in 1979 by local area businesses to obtain ambient air monitoring data for the criteria air pollutants. Eleven (11) monitoring stations were established. The primary purpose of HRM was to enable companies to satisfy Prevention of Significant Deterioration (PSD) permit application requirements.

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Safety is a matter of public perception and acceptability. Industry's activities will always be suspect and CMA should encourage government regulatory agencies to set safety standards. Until standards are set, industry will use existing measures to judge safety and explain these to the public.

Option 2: Encourage Research.

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Industry could encourage research by government agencies and universities to improve methods by which to judge safety.

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RESOURCE REQUIREMENTS

Costs: Costs will vary depending on the options selected. Costs range from nothing for option 1, to \$30,000 - \$50,000 for option 4, \$250,000 for options 5, 6 and 7, and \$600,000 for option 8.

Time: Depending on the options selected, implementation could take two to five years. The time required depends greatly on the resources devoted to the project. Option 8, for instance, will require 2 years while option 1 will depend on the speed with which regulatory agencies act. Options 5, 6, and 7 will require one year to develop consensus method(s) with additional time required for application to specific substances.

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ASSISTANCE TO SMALLER COMPANIES

PROJECT BACKGROUND

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OPTIONS CONSIDERED AND RECOMMENDATIONS

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2. Member companies and CMA, possibly using contractors, will conduct on-site training for companies in the following areas:

- Waste minimization/release reduction principles and methodologies
- Process safety
- Emergency planning and preparedness
- Communicating with employees and the community
- Public health issues.

As an alternative, CMA and member companies will develop seminars/workshops on a regional/local basis to provide information on the key issues highlighted above. They will be highly participatory and hands-on. They will use case studies presented by experienced plant personnel. The seminars will partially pay for themselves,

*In all this help
stuff, who's
liable when
something occurs?
the helper, CMA, or the
company being helped??
no protection
for company.*

Log info for W.C.
and report on it.

3/11/89

Include Maryanne
Parker
on the list

CMA Chemical Release Reduction Policy (CRRP)

1. Who says.
2. Will feed out into other programs.
3. Why focus on air?
4. Help for smaller companies; industry?

1.0 Found - CMA

- 1.1. SARA 33 Data out to public within 6 mos.

Expect a media blitz; data getting organized

- 1.2. Responsible Care timeframe 18-24 months to get implemented
CRRP is an interim program. Res Care will eventually cover this

Objectives; 1. Increase activities to reduce emissions.

2. Community - reduce impact

3. Customers & Suppliers - influence them to reduce

CMA is asking for feedback; CRRP will be presented to EPA Board in April. Will discuss with other trade associations.

- 2.0. John Heltzman - CMA VP Communications
(Rep for Res. Care).

- 2.1. OMB Watch - Under Spin-off - Computer to help people use the EPA data base; will also help establish link between industry and health effects.

2.2. ^{interview} NBC - Louisiana - names of companies not complying with 313

2.3. California - Citizens for Better Env; West Coast TOXICS _____?
 changed Env. Review; not planning
 Richmond facility

2.4. NTPIRE - Collecting emission data for 10 Countries
 to influence legislation

2.5. Chicago Lung Assoc - 75 pg report; Toxic Air Poll in IL -
 named companies; health book.

2.6. Community Plume - Env. Policy Institute asked for
 voluntary submission of theme info

2.7. Onab watch guide book -

Responsible Care - Act to improve mgmt of chemicals
 beyond law & standards; call for
 public involvement in their development.
 100 companies (out of 170) have signed onto Responsible Care.

2.9. CRRM will evolve into one mgmt code of Responsible Care.

3.0 Charlie Seay - Exxon Chemicals - Chairman - EHC.

3.1 Guiding concepts from board -

- Respond to Public
- Increase Margin of Safety
- Focus on local implementation
- Be consistent with RC.

3.2. Content -

- Preamble - General

- Policy - CERCLA

- Implementation

- Other Action

- Better define ambient levels in Env.
- Better Understand Health effects
- Help smaller companies.

1. Env. Release

1.1 Env. Released to all media

1.2 SARA 313 reports to base

1.3 Addition as appropriate

2. Eval release and opportunities

2.1 Hazards Impact - which selection help them

2.2 Community Concerns - brought up by public

2.3 Other factors - economics

3. Formulate Plan

3.1 Minimize media Transfer

3.2 Pollution improvement

3.2 Source Reduction proposed followed by attention

4. Monitor Progress

5. Report Progress

5. Communicate Plan and Result

3.3 What's new?

Multi media approach

Reduction beyond requirements

3.4 Feedback today:

Board supports.

Review with other Assoc.

Waste reduction hierarchy concerns.

3.5 Consider these changes:

1. Emphasize this is a continuation of Port.
2. Potential Health effects.
3. Applies to waste being disposed as well as air.
4. Avoid requiring such operation comply; recommended.
5. Delete ref to cross media.
6. Hierarchy - consider eliminating to avoid locking in.
7. Combine step 4 & 5 of implementation but is not jointly responsible.

Work up the CRR and send to D. Carroll

Specifics

Implementation

Guidelines

Guidelines not required because this is a
document with much emphasis on the
paper.

3. Guidelines for structure - no, such as
on the way.

Cardo, New Zealand phosphone LC paper

4.3. List of projects for monitoring is prepared only.

4.2. The cell must work with CMA about monitoring. It has been done.

4.1. The cell must work with CMA about monitoring.

4.0. The cell must work with CMA about monitoring.

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3.8. CMA looking for action name

Indexing relevant against production - not always acceptable to the public.

Need to consider business cycle, growth etc.

don't encourage long term reduction.

As CMA pushing "negotiable" No, but it

in reduction efforts.

Must plants - in formulating your plan, factor

4.4. CMA recommendations

- \$100M {⁵⁰ CMA sponsor protocols
⁵⁰ CMA gather existing data
• promote more data gathering locally
- \$300-1000mm • CIC's est. regional monitoring

4.5. CMA will not fund monitoring

4.6. Areas of effort will probably be limited to areas that already do or plan to do monitoring

Community
50 R. Van Myran - Health Effects Eval. Programs.

Health Effects not well understood.

Health concern.

Health complex.

Options narrowed to:

• CMA fund program to develop methods for setting Comm. Exposure (Plans, etc.)
the end part?

2 yrs.

\$50M

Health Research Center in Illinois

5.5 Eventually will need to develop toxicological data on effects of chemicals ~~at~~ to set acceptable exposure levels.

5.6 Trying to develop consensus on how to do this.

6.0 Rob Bradford - Assistance to Smaller Companies

6.1 RC has a commitment to help others - Smaller Companies mostly ~~not~~ CMA members - ~~non~~

6.2 To inform & promote practices that protect Env

6.3 Develop Training materials

6.4 Develop Bites

6.5 Develop Communication

6.6 Develop ~~media~~ ~~press~~ ~~adverts~~

6.7 CMA risk communication materials

6.8 No separate communications; part of a bigger program
media tour; radio, TV communications
20/mo - 15/mo

37

8.1 Blue Book -

8.2 use soup they are going to derive carcinogens; suspect.
carcinogens $\rightarrow$ O.

8.3. Health effect studies could meet 8(d) reporting criteria & may need to be reported to Est.

84 Wash, D.C. control area monitoring is intended to factor out non chemical emissions.

25. 1H Tube monitoring - how to get more info?
Bradford suggested a complete set to, ^{that} ^{the} ^{isotopically}

Devon and Graham

сахаром 1

100-443888-100

[Handwritten signature]

No Label
#1

R. for P
#4

Kgc

minutes



JOINT MEETING
HEALTH, SAFETY & ENVIRONMENT COMMITTEE
AND
SAFETY SUBCOMMITTEE

The Sheraton Music City
777 McGavock Pipe
Nashville, Tennessee

Wednesday
January 25, 1989
10:30 a.m.

Attendees:

Frank Borrelli, Georgia Gulf
Bruce Brocka, CertainTeed
W.C. Holbrook, BFGoodrich Company
Jim Kachtick, Occidental Chemical
Joe Ledvina, Vista Chemical
Gabe Lefebvre, BFGoodrich Company
Jack Lippman, Dow Chemical
Cris Lunn, Borden Chemicals
Bob Oubre, Dow Chemical
Irv Power, Occidental Chemical
Meredith Scheck, Vinyl Institute

Opening of Meeting

The meeting convened at 10:30 a.m. with Mr. Holbrook, Committee Chairman, asking for self-introductions.

Safety Workshop

Mrs. Scheck reviewed the discussions held at the December 15th Executive Board Meeting regarding the Safety Seminar concept. Mr. Lunn distributed a list of discussion items and the tentative outline for a pamphlet/brochure announcing the meeting. Following discussions, action items agreed to were:

- A. Location: Wyndham Greenspoint Hotel
Date: April 25, 1989
- B. Hotel Requirements: Block of Rooms (50-100)
Meeting Room
Audio Visual (Overhead, video/monitor, slide projector/screen)
Lunch
2 Coffee Breaks
- C. Panel Members: Lunn, Graybill, Lippman, Power and Holbrook to provide names and brief biographical sketch to Scheck by February 3rd. Power to include paragraph explaining morning presentation.

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- D. Lippman agreed to moderate afternoon session and to arrange for video presentation in conjunction with the luncheon.
- E. Budget to be developed by VI to allow for project to be self-funded and supported by registration.
- F. Assessment sheet to be developed by Lunn/Scheck for development of report to the Board.

Hazard Ranking System

Mr. Holbrook introduced Mr. Lefebvre of the BFGoodrich Company, noting Mr. Lefebvre's involvement with activities of the Chemical Manufacturers Association on the Hazard Ranking System and related issues.

Mr. Lefebvre noted on December 21st that EPA had published in the Federal Register regulations related to the National Contingency Plan and on December 23rd had published the proposed rule on the Hazard Ranking System. He reviewed CMA activity to date on both of these items and noted that the comment period on both items closes February 21st. Mr. Lefebvre noted that he has taken a lead role on the HRS Task Force and Mr. Holbrook reviewed the potential impact of the HRS proposed rule on his and other VI member companies (referencing such items as on site landfills and impoundments). Mr. Lefebvre urged those present to review the proposed rule to determine its impact on each of their facilities. He noted the current involvement on the CMA Task Force of representatives of 2 Vinyl Institute member companies (Dow and PPG), and noted his eagerness to have the input and involvement of others.

In this regard, Mr. Lefebvre distributed four items he had prepared which Mr. Holbrook asked be appended to the minutes as follows - NCP Issues for Comments; Proposed Rule - NCP, comments being developed by CMA; Draft Comments on Hazard Ranking System; and Hazard Ranking System - Comments Requested by EPA.

TCLP Update

Mr. Ledvina stated that although he had been earlier informed that the TCLP would be finalized in March, that it now appears as though the date may be June. He commented further that he understood the vinyl chloride level being considered is 200 ppb.

Mr. Holbrook commented on the impact of this item on surface impoundments. He noted that it is his understanding that it is in "red border review" by EPA and that publication could be anticipated as early as March. Mr. Holbrook noted that the effective date will be six months after promulgation. The committee had a round table discussion on current activity within member companies on impoundments and ponds.

Vinyl Chloride Standard

Ms. Scheck noted that amendments to the standard implementing the provisions of settlement agreement in SPI v EPA have not yet been published, but noted that the Agency is required to file a monthly update with the court.

SARA

Mrs. Scheck distributed additional copies of the chart developed as a result of member company input. Mr. Ledvina offered to provide additional input gleaned from FOI requests and asked that Mrs. Scheck distribute this chart to all committee members.

Mr. Holbrook asked for a roundtable discussion on the treatment of relief valve discharges under 61.65 and the definition of "otherwise federally permitted" vis-a-vis SARA's reporting provisions to the NRC.

VI Awards

Mrs. Scheck noted that forms for the VI Environmental Recognition and Safety Performance Awards along with the nominating ballot for the Annual VI Safety Award were mailed the previous day. Mrs. Scheck noted that the OSHA calculation sheets were the same as in past years and did not reflect discussions at the March 1988 Committee Meeting concerning incorporation of contract maintenance personnel. Mr. Lippman noted the procedures his company follows in dealing with and assigning responsibility for contract employees. Following a lengthy discussion on appropriate amendments to the Safety Award calculation to assure fair and equitable comparisons that would satisfy the varying practices and legal views of VI member companies, it was decided that the issue would be discussed at the Committee's next meeting.

ADSTR

Mr. Borrelli inquired as to the interest of VI involvement in providing comments on the second 25 draft toxicological profiles released by the Agency For Toxic Substances and Disease Registry and EPA. It was the consensus of the group that companies should provide appropriate input to the CMA (see attached memo on subject).

OHEIC

Mrs. Scheck inquired whether any member of the Committee wishes to serve as a VI representative to the SPI Occupational Health Environmental Issues Committee. Members commented that they would be willing to participate on special task forces/projects of OHEIC and suggested that Mrs. Scheck attend the next meeting of the committee and provide some recommendations following that meeting.

Next Meeting

The next meeting is scheduled for May 8th in conjunction with the VI Annual Meeting, unless the Chairman decides that an earlier meeting is necessary. Following the May meeting, it was suggested that tentatively the next meeting would be during the last week of September.

May 8th Agenda

In summary, it was agreed that the agenda for the May 8th committee meeting would include:

1. Update on measurement of fugitive emissions, with presentations by Vista and Borden.
2. Review of criteria presently used in computing VI Safety Performance Awards and discussion of appropriate changes to those criteria.
3. Update on labeling.

There being no other business, the meeting adjourned at 3:00 p.m.

Wendell H. Schuch

NCP Issues for Comments

- 51407 o Definition of "on-site" for permitting purposes. } 300.400 General
- 51409-10 o Removal limitation implementation. } 300.415 Removals
- 51413 o Deferral policy/remedial site evaluation policy (PA/SI). } 300.420 Rem. Site Ev.
- 51415 o Merits of creating a construction completion category for sites on the NPL. *
- 51415 o Whether deferral should be extended to state authorities. * (implicitly)
- 51415 o Whether deferral should be extended to sites where PRPs enter into Federal enforcement agreements for site remediation.
- 51416 o Deferral policy - extension to other federal authorities. * (June draft)
- 51418 o The appropriateness of deferring generally to Federal authorities and whether these authorities should be required to meet some or all CERCLA standards. } 300.425
- 51418 o Comments on two state deferral options
- deferral based on State petition requesting deferral.
- deferral based on states certification of its commitment and ability to address the site according to CERCLA standards.
- TAG grants
- public notice (public meeting)
- ATSDR
- Non NPL listing for deferral sites } Establish Remediation Priorities [Obvious]
- 51419 o Deferral policy - sites regulated by multiple authorities. *
- 51419 o Deferral of sites with agreements under CERCLA enforcement authorities - 2 options *
- 51420 - deferral prior to NPL proposal based on agreement to carry out EPA - RD/RA pursuant to consent decree.
- deferral at time of proposal based on agreement to conduct a RI/FS for that site, with the proposed site dropped if PRP

subsequently agrees to perform RD/RA pursuant to consent decree. *(preferred option)*

- I
- 51420 o Appropriate method for identifying problem sites, if those sites are not proposed for the NPL because of deferral to CERCLA enforcement agreement.

- 51421 o Deferring placement of sites on NPL when other authorities are available to address contamination at the site and deferring sites when PRPs have signed enforceable CERCLA consent orders.

- ↑
- 51421-2 o Deleting final sites based upon deferral to other authorities/criteria

- Nobody
- 51426 o Risk ranges - two in particular
- current 10^{-4} to 10^{-10}
 - alternative 10^{-4} to 10^{-6}
 - issues related to these or alternative risk ranges

- ↓
- 51431 o Potential advantages and disadvantages of alternative site-specific balancing approaches related to
- type of criteria considered
 - steps for making statutory findings
 - degree of proposed structure *

- [Duke]
- o Two alternative approaches are
- site specific balancing with a cost-effectiveness screen
 - sequential decision making approach *

- II
- 51432 o Appropriateness and desirability of pursuing one of the following alternative strategies
- point of departure *
 - site stabilization *

- o Potential advantages and disadvantages of the following analytical techniques
- screening against threshold criteria
 - pairwise comparison
 - ranking alternatives or criteria
 - scoring (measuring alternatives against a consistent scale)
 - weighting alternatives or criteria
 - construction of a multi-attribute model

cont'd

300.430
RIFS
Remedy
Selection
[Kissel]
↑ generally

- III 51433-5 o Groundwater remediation approach
- 51436 o Criteria for ARARs
- IV 51439-40 [Heur] o Waiver of ARARs
 - interim remedy
 - equivalent performance
 - fund balancing - specific amount
- 51440 o Where ARARs must and TBCs should be attained *
- 51450-2 o Community relations/public comment
- V 51452-3 [Quakes] o Community relations during RD/RA phases
- 51454 o Interpretation of "restore ground and surface water quality" and on the merits of alternatives EPA has not adopted.
- Nobody 51454 o Whether ten year O&M rule should extend to situations where primary purpose of ground water treatment is to provide drinking water supplies from water contaminated at the site without restoring it. 300.435 RD/RA O&M
- 51454 - o Appropriateness of requiring regions to enter into SMOAs if states request them and have demonstrated capability to take the lead for response action.
- 51455
- 51456 o Comment on criteria for state lead designation
 - overall expertise
 - legal authorities
 - administrative and contracting capability
 - financial management systems
 - availability of general resources
 - complexity of site
 - availability of site-specific resources
 - workload and expertise
 - past Federal and State actions at the site
 - past State cleanup activity
 (should other criteria be added?) State Role F
- VI
- 51461 [Quakes] o Subpart H comments
 - consistency with NCP for private party cleanups } Participation By Others H
- VII
- 51468 o Should a notice of availability of administrative record or of commencement of public comment period be published in the Federal Register? (administrative record for remedial action) * Admin Record I
 V [Quakes]
- V

- 51469 o Should public comment be solicited on activities that have already been completed at the time the record is made available?
 (administrative record for removal action)*
- 51469-70 o Comment on approaches to developing
 administrative record for removal actions.*
- 51470 o Comment on adding documents to record after
 selection of response action.*

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- 51470 o Comment on adding documents to record after
 selection of response action.*

PROPOSED RULE
Federal Register - 12/21/88

NATIONAL CONTINGENCY PLAN

Comments Being Developed by CMA

How to keep score on clean-up progress:

- Establish a separate category for sites after construction completion, or
- Establish a separate category for sites in O & M phase

► Establish a mechanism to re-score sites after a removal action is completed, or new information is available, such as after an RIFS is completed.

Selection of ARAR's:

- Support an expansive definition of "on-site" to minimize need for permits for on-site response activity.
- Insist on a strict definition of "relevant and appropriate". Specifically discourage the wording "generally relevant and appropriate".
- Comment on importance of waiver for "inconsistent application" of State ARAR's.
- Comment on point of application of ARAR's: point of use, or fence line, but not within the contaminated area itself.

Use of TBC's:

- Request clarification of the use of the term "to be considered" (TBC).
- List of TBC's should be deleted.

Five-Year reviews:

- Comment on the application of up-dated ARAR's during the five year review of completed or O & M sites. This is a major issue, because with the expected ratcheting of all environmental standards, eventually every completed site will require additional remediation to meet future ARAR's.

Remedy Selection Process:

- Comment on risk range to be used - 10^{-4} - 10^{-6} , and support less stringency.
- Endorse their proposed utilization of the nine factors involved in remedy selection.
- Offer a better definition of "cost-effectiveness", which includes an analysis of the unit cost of remediation.

NATIONAL CONTINGENCY PLAN

Comments Being Developed by CMA

(Continued)

Administrative record issues:

Judicial review of 106 Orders seeking and injunction.

Content of the Record- Only "final" documents

Only documents "considered" by
decision maker.

Timing of the Record's availability, the onset and
length of the public comment period, and the timing
of the EPA's response to comments.

Applicability- Not applicable where the RI commences
after the promulgation of new
standards.

Not applicable to third-party clean-ups,
including states that seek to
recover costs under CERCLA 107.

NPL Criteria:

States should not have veto power over delisting
petitions.

Request clear definition of "significant release" that
would result in re-listing a deleted site without
HRS rescoring.

Deferral policies- EPA oversight is not required for
sites deferred to states.

Procedures should be established so that it is not
likely that sites remediated under state authority
will ever become CERCLA sites and require
remediation by the PRP's again.

Sites should be deferred to a clear single authority,
not to a mix of authorities.

PRP's should not be required to sign a Consent Order
for full remediation (a blank check) before the ROD
as a condition of deferral.

GFLeFebvre
1/20/89

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PROPOSED RULE
HAZARD RANKING SYSTEM

Comments Requested by EPA

- III.C. Functional equivalence of cut-off score under current and proposed rules.
- Statistically equivalent scores after scoring a cohort of sites both ways.
 - Score that generates the same size NPL after scoring the same sites.
 - Determine new score that corresponds to the same quantitative risk level.
- V.C.1. Potential revisions under consideration:
- Revise format to resemble quantitative risk assessment.
 - Use logarithms of numbers for factors.
 - Move waste quantity factor from Waste Characteristics section to Likelihood of Release section.
 - Remove caps (maximum values) from some or all factors.
- V.C.2.
- Is default value of 3 (on a scale of 1 to 5) appropriate for toxicity factor if no data is available?
 - Are toxicity rating scales appropriate for acute, carcinogenic and chronic exposures?
 - Is it appropriate to use the toxicity factor for the single, highest scoring, hazardous material in scoring each pathway?
- V.C.5.
- Inclusion of populations in Level 2 if substances from site without health-based benchmarks are found in drinking water.
 - Methodology of combining bench-mark ratios for substances found in drinking water.
 - Alternative approaches to assessing actual drinking water exposure risks.
- V.C.6.
- Relative weighting of "sensitive environmental" vs. "public health" impacts.
 - Listing of "unique biotic communities".
- V.C.7.
- Should food chain threat be included in scoring air and/or ground water pathways?
- V.C.8.
- How should frequency of incursion from nearby populations be taken into account in scoring Onsite Pathway?

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- V.C.9. - Should an MEI factor be included in scoring Onsite Pathway?
- V.C.10. - Should sites be scored on "Initial Conditions" or "Current Conditions"?
 - If re-scored after a removal action, should the site be re-sampled, or should the Hazardous Waste Quantity Factor be adjusted?
- V.C.11. - How should low population density target areas be handled in the HRS?
- V.C.12. How should standby water wells and intakes be handled?
 - Assign value based on % of supply or % of year utilized.
 - Consider only regularly maintained supplies, or only ones used more than a cut-off amount.
 - Assign standby sources a fractional value.
- V.D.1. Ground Water Pathway - Is two mile radius appropriate for evaluation of:
 - Aquifer connections?
 - Hydraulic conductivity?
 - Sorptive capacity?
 Target Distance - How should karst aquifers be handled?
 Likelihood of Release - Are sorptive capacity factors OK?
 - Should physical state factor be eliminated?
 Targets - Future use vs. current use?
 - How should unused but contaminated ground water resources be rated?
 - How should sources within a Well Head Protection Area (WHPA) be rated?
 - How should EPA meet requirements of Section 118 to give high priority to sites that have contaminated principal drinking water supplies?
- V.D.2. Surface Water Pathway
 - Target Distance - 15 miles vs. current 3 miles?
 - Likelihood of Release - Should physical state factor be eliminated?
 - How should flood potential and containment be evaluated?
 - How should potential to release contaminated ground water to surface waters be evaluated?
 - Food Chain Threat - Use of 0.2 factor for fishing catch/standing crop ratio?

Recreation Threat - Can we offer refinements
to their approach in evaluating this sub-
pathway?

V.D.3. Air Pathway

Potential to Release - Are the three proposed
factors appropriate (for source type,
source mobility and source containment)?

V.D.4. Onsite Pathway

- Is breakdown of exposed population groups
appropriate?

Resident Population Threat - How should
contaminated area be defined?

Targets - How should high-risk population
be defined?

Nearby Population Threat - Likelihood of
Exposure - Is proposed algorithm
appropriate?

DRAFT COMMENTS ON PROPOSED RULE

HAZARD RANKING SYSTEM

III.C. Functional equivalence of cut-off score:

Engineering-Science will identify several sites for which they developed an RIFS, and which they feel are fairly representative of the universe of sites to be scored. These sites will be scored with the new rule, and the results studied to determine if there are any specific parts (factors, weights, caps, etc.) of the new rule that they feel should be challenged because the score does not accurately reflect actual risk to human health or the environment.

> If there are no obvious incongruencies, we will recommend that EPA implement their third option, i.e., determine the new score that corresponds to the same quantitative mean risk level as 28.5 under the old rule.

V.C.1 Potential revisions under consideration:

We should encourage the agency to leave the Waste Quantity Factor in the Waste Characteristics score of each pathway. Putting it in the Likelihood of Release score is inappropriate (it's adding apples and oranges), and will make it almost impossible for a pathway to score 0 under any circumstances.

V.C.2 Toxicity issues:

E-S will review the algorithm for toxicological issues.

CMA should support a concentration/quantity weighed toxicity factor, considering all the individual hazardous materials known to be present, instead of the single, highest scoring approach taken in the proposed rule.

V.C.9 Definition of Maximally Exposed Individual (MEI):

We may wish to comment on this issue, if E-S identifies the Target score of any pathway as an incongruity resulting from the MEI factor.

V.C.10. Site rescoring:

CMA should develop very persuasive comments in support of the use of "Current Conditions" instead of "Initial Conditions" whenever a site is scored.

V.D.1. Ground Water Pathway:

CMA should reiterate its earlier comment that up-aquifer targets score as zero.

CMA should make a positive supporting comment on the use of groundwater dilution factors in the proposed rule.

V.D.2. Surface Water Pathway:

CMA should support the current rule's 3 mile target distance, instead of the 15 miles proposed.

CMA should comment on the complexity of the rule, and the importance of determining realistic and appropriate default factors when site and/or chemical specific data is not available. E-S was asked to study whether an index could be developed to limit the number or portion of the score that could be developed with default factors. This would require that a certain minimum amount of site specific data be collected and available for the scoring process at each site.

GFLeFebvre
1/11/89

10/11/88

cc FERGUSON



CHEMICAL MANUFACTURERS ASSOCIATION

December 5, 1988

cc FERGUSON

TO: Health and Safety Contacts of CMA Member Companies

SUBJECT: ATSDR Draft Toxicological Profiles

On April 17, 1987, the Agency for Toxic Substances and Disease Registry (ATSDR) and EPA published a list of the 100 most hazardous substances found at waste sites and guidelines for the development of "toxicological profiles" on those substances (52 Federal Register 12866, 12870). These profiles will be used to estimate "significant human exposure levels", to identify data needs, and to recommend further testing. ATSDR has developed toxicological profiles on the first 25 substances. The profiles will be available in final form in December. The Agency's next step is to develop draft profiles on the second 25 substances identified on the enclosed priority list.

Although ATSDR will conduct its own scientific peer review on each of these chemical-specific toxicological profiles prior to public disclosure, CMA believes that a similar industry review of the profiles is warranted. I solicit your help in volunteering knowledgeable industry scientists, reputable consultants or other industry trade groups to evaluate the second 25 draft toxicological profiles scheduled for release this December.

Although this CMA activity is focused on specific chemicals, the reviews prepared by industry panelists will be the basis for an overall CMA evaluation of the general content, format, and process by which these draft toxicological profiles were developed. Our assessment of the profiles on a chemical-specific and general basis will be important to the development of profiles on other listed chemicals during the next few years. As you know, the profiles will likely be used not only for the purposes originally intended by SARA, but as the basis for other federal and state regulatory activities.

You can help CMA ensure that the data and conclusions in the profiles are supportable by industry. Please return the attached form by **December 30, 1988**, indicating each substance of interest to your company and the industry health scientists that will help review and evaluate the toxicological profiles on those substances. Remember to note the names, addresses and the phone numbers of other persons outside of industry known to have expertise on any of the substances. In addition to participating in this activity, you are encouraged to submit comments to ATSDR on behalf of your company.

Health and Safety Contacts
Second 25 Draft Toxicological Profiles
December 5, 1988
Page 2

Note that while it is unlikely that member companies will submit confidential data to CMA in response to this request or as a result of reviewing the toxicological profiles, CMA has set up special safeguards to protect confidential information on specific chemicals from disclosure to competitors or the public. To assure this protection against disclosure, please clearly designate such documents submitted to CMA as "CONFIDENTIAL." Any such submittal should be on plain bond paper and should contain no reference to your company or bear any signature.

In January, I will communicate with the persons you've designated as participants in this important activity. Please call Leslie J. King of my staff at 202/887-1323 if you have questions or need more information about the priority list of 200 substances or the development of toxicological profiles.

Sincerely yours,

Geraldine V. Cox
Geraldine V. Cox, Ph.D.
Vice President-Technical Director

Enclosure

VVV 000028528

SECOND 25 PRIORITY SUBSTANCES
FOR ATSDR TOXICOLOGICAL PROFILE DEVELOPMENT
(53 Fed. Reg. 41280)

CAS NO.	Substance Name
56-23-5	Carbon tetrachloride
57-74-9	Chlordane
62-75-9	N-nitrosodimethylamine
72-55-9	4,4-DDE, DDT, DDD
75-00-3	Chloroethane
75-27-4	Bromodichloromethane
75-35-4	1,1-Dichloroethene
78-59-1	Isophorone
78-87-5	1,2-Dichloroethene
79-00-5	1,1,2-Trichloroethane
79-43-5	1,1,2,2-Tetrachloroethane
87-86-5	Pentachlorophenol
91-94-1	3,3-Dichlorobenzidine
92-87-5	Benzidine
→ 107-06-2	1,2-Dichloroethane
108-88-3	Toluene
→ 108-95-2	Phenol
111-44-4	Bis(2-chloroethyl)ether
121-14-2	2,4-Dinitrotoluene
319-84-6	BHC-alpha, gamma, beta, delta
542-88-1	Bis(chloromethyl)ether
621-64-7	N-nitrosodi-n-propylamine
7439-97-6	Mercury
7440-66-6	Zinc
7782-49-2	Selenium

CHEMICAL MANUFACTURERS ASSOCIATION

INDUSTRY PEER REVIEW PANELS
TO EVALUATE TOXICOLOGICAL PROFILES
ON THE SECOND 25 PRIORITY LIST SUBSTANCES
UNDER SECTION 110 OF SARA

RETURN BY: December 30, 1988

RETURN TO: Leslie J. King
Manager
Health, Safety and Chemical Regulations
Chemical Manufacturers Association
2501 M Street, NW
Washington, D.C. 20037
(202) 887-1323

* * * * *

<u>Substances</u>	<u>Health Scientist(s)</u>	<u>Address and Telephone Number</u>
(Circle one or more)		
Carbon tetrachloride	_____	_____
	_____	_____
Chlordane	_____	_____
	_____	_____
N-nitrosodimethylamine	_____	_____
	_____	_____
4,4-DDE, DDT, DDD	_____	_____
	_____	_____
Chloroethane	_____	_____
	_____	_____
Bromodichloromethane	_____	_____
	_____	_____

VVV 000028530

1,1-Dichloroethene	_____	_____
	_____	_____
Isophorone	_____	_____
	_____	_____
1,2-Dichloropropane	_____	_____
	_____	_____
1,1,2-Trichloroethane	_____	_____
	_____	_____
1,1,2,2-Tetrachloroethane	_____	_____
	_____	_____
Pentachlorophenol	_____	_____
	_____	_____
3,3-Dichlorobenzidine	_____	_____
	_____	_____
Benzidine	_____	_____
	_____	_____
1,2-Dichloroethane	_____	_____
	_____	_____
Toluene	_____	_____
	_____	_____
Phenol	_____	_____
	_____	_____
Bis(2-chloroethyl)ether	_____	_____
	_____	_____
2,4-Dinitrotoluene	_____	_____
	_____	_____
BHC-alpha, gamma, beta, delta	_____	_____
	_____	_____
Bis(chloromethyl)ether	_____	_____
	_____	_____
N-nitrosodi-n-propylamine	_____	_____
	_____	_____
Mercury	_____	_____
	_____	_____

Zinc

Selenium

* * * * *

SUBMITTED BY: NAME: _____

COMPANY: _____

ADDRESS: _____

TELEPHONE NUMBER: _____

SIGNED _____