

TO: T. G. Grumbles

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FROM: J. C. Ledvina

DATE: March 7, 1989

Interoffice
Communication

SUBJ: CMA CHEMICAL RELEASE REDUCTION Policy (CRRP)

VISTA

On March 1, 1989 I attended a briefing meeting in Washington on CMA's proposed Release Reduction Policy (CRRP). The purpose of this program is to encourage CMA member companies to reduce air emissions of SARA 313 compounds. CMA expects to finalize CRRP in April.

Mr. R. A. Roland, President of CMA, gave an overview of the need for the Policy and outlined its objectives. CMA is concerned that a number of "Environmentalist" organizations are mobilizing a lobbying and media push to reduce toxic air emissions. It is expected that these organizations will use the SARA 313 reports as the basis for their efforts. CMA expects environmentalist activity within 6 months.

The objectives of CRRP is to increase member activity to reduce air emissions of SARA 313 compounds and any other compound that makes sense to do so. Another objective of the program is to encourage voluntary industry ambient air monitoring to get real world ambient concentrations of compounds. A third objective is to influence our customers and suppliers to reduce emissions.

CMA's Responsible Care Program includes a component to improve the management of chemicals beyond that required by laws and standards. However, because Responsible Care is such a monumental program, CMA anticipates it will take another 18-24 months to get it moving. CMA views CRRP as an interim program to accelerate air emission reduction activity. It will be rolled into the Responsible Care Program when Responsible Care is ready to be activated. To date, approximately 100 of 170 CMA members, including Vista, have signed the Responsible Care Agreement.

Mr. C. T. Seay (Exxon Chemicals) Chairman of CMA's Environmental Management Committee presented an outline of the proposed program. CRRP is composed of five parts:

1. Inventory Releases

- 1.1 Inventory releases to all media.
- 1.2 Use SARA 313 reports as a basis.
- 1.3 Add other compounds where appropriate

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2. Evaluate Release Reduction Opportunities
 - 2.1 Evaluate health impact - Determine which reductions will reduce health impact the most.
 - 2.2 Evaluate concerns brought up by the community.
 - 2.3 Consider other factors such as economics
3. Formulate a Plan
 - 3.1 Minimize cross-media transfer.
 - 3.2 Show continuous improvement.
 - 3.3 Reduce at the source where feasible.
4. Monitor Progress
5. Communicate the plan and results to the public.

Evaluation of reduction opportunities involves regional modelling and ambient air monitoring. CMA is encouraging industry groups such as the Chemical Industrial Councils (LCA, TCC, etc.) to organize this effort. CMA will not be directly involved in these programs and as a result, the cost will be born by the participants in each of the regional networks.

In summary, CRRP is expected to be finalized in April. It is voluntary waste minimization concentrating on reductions of SARA 313 compounds to the air. Its purpose is to neutralize an anticipated media blitz by environmentalist in the next 6 months.

Vista's Waste Minimization Program is compatible with both CRRP and Responsible Care. We anticipate SARA 313 emissions reported this summer to be lower than last year primarily due to fugitive emission bagging studies. We should communicate this progress to the public in early summer. Goals for further reductions need to be considered for FY 1990 so that future 313 reports show reductions.


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