

Interoffice Communication

To R. D. Gamblin
From Jack Neeld
Date November 12, 1980
Subject U. S. Government Information Requests - Environmental

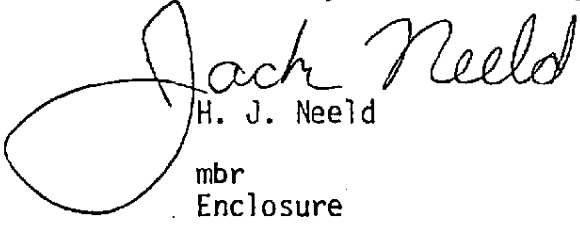
Industry has become increasingly reportable to the U. S. Government in the past decade. The environmental field is exemplary of this point. The enactment of such legislation as the Clean Air Act; Clean Water Act; Resource Conservation and Recovery Act; Safe Drinking Water Act; Toxic Substance Control Act; Coastal Zone Management Act; National Environmental Policy Act; Surface Mining Control and Reclamation Act; Federal Insecticide, Fungicide and Rodenticide Act; etc., has increased substantially the controls on every aspect of business.

The impact of these controls has been studied on a grand scale on numerous occasions, with varying degrees of creditability. One area which is usually not addressed is the effect of the broad regulatory power granted to the controlling agency to request information "as may reasonably be required by the administrator."

Attachments I and II provide historical records of government exercising that power quite often. The data entries represent information requests for the last two years for VCM and LCCP. The requests are over and above the formidable routine reporting requirements associated with preconstruction and/or operating permits. Many times, the information sought has been submitted to a different branch of the same agency.

A total of 157 mandays, or 31.4 manweeks, were utilized during the period addressed, disregarding supervisory needs. The information reported is for only a single industrial complex for a single division of a major company. It becomes astounding to multiply that figure times a significant portion of Conoco's operations times the affected industry of the nation.

It would seem a true waste of limited resources in a time when national productivity is at its lowest for this to continue without a close look at the real need for such submittals. Industry can and should make this type of information known to the heads of government, asking if it is really necessary or efficiently accomplished.


H. J. Neeld

mbr
Enclosure

cc: RWS JADeB GLF RHG WJR MLH
JJH JCL DAK JJD VM
CRH

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