

REPORT TO THE
REVIEW COMMITTEE
NOVEMBER 1981



CHEMICAL MANUFACTURERS ASSOCIATION

Formerly Manufacturing Chemists Association — Serving the Chemical Industry Since 1872.

CMA 054920

REPORT TO THE
REVIEW COMMITTEE
NOVEMBER 1981

CMA 054921

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TECHNICAL DEPARTMENT OVERVIEW

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SUMMARY OF TECHNICAL DEPARTMENT 1980-1981

The CMA Technical Department, like the rest of Washington, has undergone a radical change since last November. Not only do we have a new home, but a new government as well. The change in the Administration has forced an entirely new form of advocacy on our organization. With the Carter Administration, a good advocacy program consisted of sending a massive legal text to the agency, and then following with a court challenge. This is now out of date. We have access but with it, a new level of responsibility.

Many think that the new Administration means less work -- on the contrary -- it means harder, more technical work, and far more accuracy than in the past. We are being asked to develop a position and then to prepare the staff work to back that position. In many cases, we are asked to produce data which we do not have in hand, and to do so in very short periods of time. The Regulatory Reform package required a Herculean effort in a one-month period. Similar demands are common, while perhaps not as visible. Our task is much more demanding than it has been in the past.

We are being asked to produce different types of data than in the past. We never accumulated economic data because previous administrations felt that economic data were irrelevant. Now we must produce unchallengeable economic data almost overnight. CMA and its members must adjust to this new world. We have made major strides in this direction, and are able to respond to most requests.

We are asked to perform some functions that the Federal Government has traditionally handled. We have been approached to develop voluntary standards for some aspects of regulation that the Federal Government can adopt by reference. This is probably just the tip of the iceberg in terms of requests -- assuming the federal cutback of funds and employees. We are able to handle our current workload as staffed, but it may require considerable expansion of company commitment as well as staffing if we assume some of the governmental functions.

When we prepared our budget last year, we knew we were in a period of uncertainty because of the transition. Our current expenditures reflected that, and our outlays are somewhat behind projection. This is a result of the slow staffing in the agencies as well. We will most likely be close to our budget forecast by the end of the year.

The Technical Department has become more stable, and better trained during the last year, and is becoming one of the major forces in the Washington area. This is the result of the cooperation of company personnel and the other departments.

TECHNICAL DEPARTMENT OVERVIEW

The title of our department is somewhat misleading. The Technical Department's primary responsibility is managing regulatory affairs with other associated technical responsibilities taking a secondary function. This CMA department has the largest staff complement and works with the largest number of committees, task groups and work groups. (This is a staggering total of 6 Standing Committees, 3 Special Board Committees, 23 Biomedical and Environmental Special Program Panels, 103 Task Groups and 56 Work Groups.) This means that the Technical Department must manage more than 1200 meetings during a calendar year, and work with about 1200 individual member company volunteers.

In addition to directing regulatory response activities, the Technical Department provides the written testimony and witnesses for the Government Relations Department. The Standing Committees develop the policy which becomes the CMA legislative position on technically-related fields -- air, water, solid wastes, Superfund, worker safety and health, labelling, toxic substances, distribution of chemicals, energy, and engineering standards.

The Technical Department staff work closely with the Communications Department to guarantee technical accuracy in all of CMA's communications output -- booklets, films, radio scripts, advertisements, Chemecology, CMA News and other materials that they produce. In addition, CMA Technical Department staff have participated in media tours and individual shows in 26 cities since the last audit report.

The Technical Department staff work closely with the Legal Department to develop CMA regulatory positions, and supports the legal staff with technical assistance whenever an issue is in litigation.

The entire CMA staff operate under a team approach. Each issue has a manager -- generally from the Technical Department -- and a staff member is assigned from the Government Relations Department, Legal Department, and Communications Department. In those areas which have state implications, representatives of the State Activities Group will participate in the issue development. This is true for both the CMA staff and for the member company participants. While this may seem a little inefficient at first glance, it helps to minimize the overall coordination problems that are frequent in an organization the size of CMA.

The Technical Department's role is also one of an educator. The department conducts a number of educational seminars, and joint seminars with the Federal Government. This year

CMA began an outreach program with federal agencies to conduct joint programs. The first was a joint NIOSH-CMA seminar in Philadelphia which centered on engineering workplace safety. The National Bureau of Standards co-sponsored a symposium with CMA on November 4-5, 1981 on arsenic. The Technical Department is currently planning a major exhibition and technical session with the US Coast Guard and USEPA on hazardous spills and waste disposal sites. Another seminar which will explore ground water contamination is in the planning stages and will be co-sponsored by the Council on Environmental Quality and the National Academy of Sciences.

Our other seminar activities include a program with the American Occupational Medical Association which is a symposium for general practice physicians designed to train them to recognize occupational illnesses. We are in our third year of CHEMTREC seminars, and the company volunteers are tired! So, we contracted with Texas A&M to run the training program. It still needs more work, but it is going to help in the long run. Special topic seminars are conducted by the standing committees and they all hold semiannual open meetings to give the general membership a status report of all of their activities.

Speaking of CHEMTREC, we have installed hard-copy transfer capability and the teleconferencing bridge. We have added to the staff to upgrade our records review procedures. We also celebrated our tenth year of operation -- a credit to the industry!

The Technical Department is organized into five divisions, and each division is managed by a division director. The overall Technical Department organization appears in Figure A-1 on the next page. There is an authorized staff complement of 61 with a current staffing of 59. Each of the divisions has about the same staff size, and are equally balanced between technical and support staff. The technical staff are recruited from a mixed experience background, however, most come from some chemical industry experience. They have worked for the following companies:

American Cyanamid Company	ICI Americas Inc
Celanese Corporation	Johnson & Johnson Co.
Clairol, Inc.	Monsanto Company
CPC International Inc.	Olin Corporation
The Dow Chemical Company	PPG Industries, Inc.
Eastman Kodak Company	Rohm and Haas Company
GAF Corporation	Tenneco Chemicals, Inc.
Great Lakes Chemical Corporation	Ventron
	W.R. Grace & Co.

Six technical staff members came from consulting backgrounds, seven from the government, and two from publications.

VICE PRESIDENT
TECHNICAL DIRECTOR
G. V. COX

Approved:
G. V. Cox
10/08/81

Secretary
T. Punaro
L. Tiller

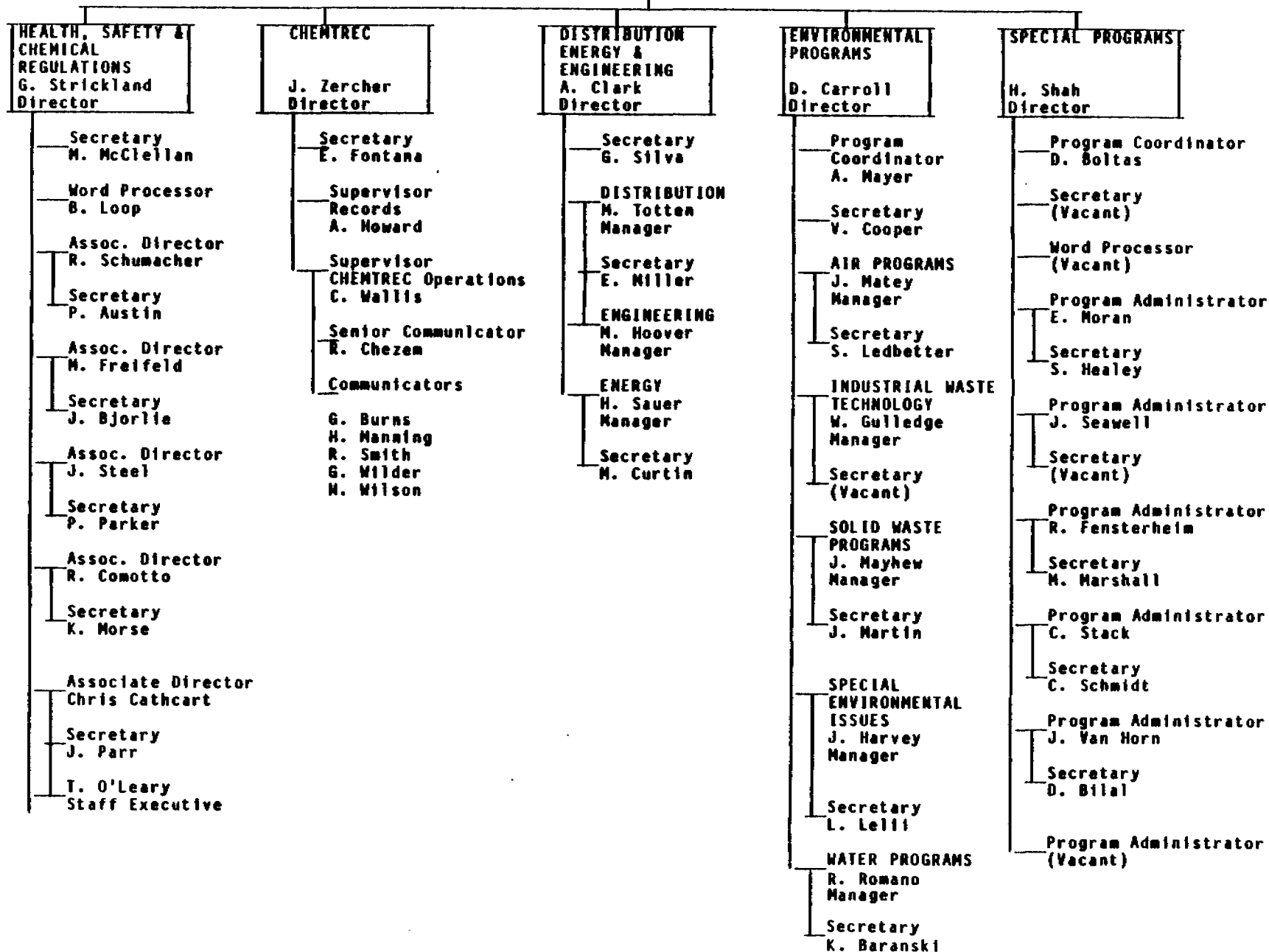


Figure A-1. TECHNICAL DEPARTMENT ORGANIZATION CHART

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The technical staff is balanced by education as well:

Ph.D.	21%
M.S.	52
B.S.	25
Law	9

The staff have training in the following disciplines:

Biology	43%
Business (MBA)	17
Chemical Engineering	22
Chemistry	9
Economics	9
Environmental	17
Law	9
Public Health Adm.	9

Other than the Technical Director, none of the staff has had previous trade association work experience (other than committee memberships), therefore, we must train technical personnel to function as association staff executives. Six Technical Department staff participated in the Chamber of Commerce school for association executives. They assisted the other staff with ideas on association management from this training. The lack of association experience has made it difficult during the transition period between MCA and CMA, but that gap is rapidly closing.

We have tried to provide a continuing education experience to Technical Department staff. This has included two types of training:

Seminars held at CMA

Technical Writing	2 seminars run approximately 6 months apart.
Business Writing	A 2-day seminar for secretaries.
CPR Training	A 3-hour training program.

Seminars held outside of CMA

Media Training	9 scientific staff attended.
Lanier Training	3 support staff attended.
Chamber of Commerce Association Management College	6 attended the 1st year.
	1 attended the 2nd year.
Time Management	1 attended.
General Management	1 attended.
Toxicology Seminar	1 attended.
Training for Toxicology Board Certification	1 attended.
QYX training	6 attended.

In addition to professional training and experience, it is essential that the Technical Department staff remain current with the developments in their field. One of the best ways to achieve that goal is to participate in professional associations. Technical Department staff are active in the following (hold committee chairs or memberships):

- American Chemical Society
- American Institute of Chemists
- American Society for Testing and Materials
- Conservation Foundation
- Federation of Organizations for Professional Women
- National Bar Association
- Society of Environmental Toxicology
- Society of Women Engineers
- Water Pollution Control Federation
- U.S. Chamber of Commerce

The Technical Department has weekly staff meetings which are attended by the directors or their designees if they are not available. The directors also have a management retreat once a year during which the entire Technical Department operations are reviewed and alterations suggested as a result of the review.

The late August retreat focused on several areas: staff training -- more company exposure and training in group dynamics; monitoring staff performance; budget process; possible teleconferencing in lieu of task group meetings; a booklet -- Technical Department/what it is and what it does; a review of contract procedures; new personnel indoctrination; new committee member orientation programs; inventories of contractor-held CMA equipment; etc.

The Technical Department is reaching a stability that will allow better staff training, and more efficient operations. The department is well on its way to reaching a more mature operational condition than it experienced in the last three years.

Three major standing committees have conducted retreats as well -- Chemical Regulations Advisory Committee, Occupational Safety and Health Committee, and Environmental Management Committee. This allows a committee to review its operations and to develop long-range plans for future programs. These are held near Washington in an area which has limited access -- Airlie House, Belmont, and the Sheraton Conference Center in Reston. These planning sessions are showing their value as we implement the recommendations.

As we are able to manage the commitment, the Technical Department staff are working with outside groups to foster the chemical industry objectives. Since November 1980, staff members have served on an EPA research review committee on solid waste, an advisory group on solid waste for the Association of State Solid Waste Management Officials (a subgroup of the National Governors' Association), and the US Coast Guard's Chemical Transportation Advisory Committee. Staff serve as co-chairman of the Conservation Foundation Dialog Group on Hazardous Wastes, and on the main Dialog Group on Environmental Affairs. We assisted the Heritage Foundation in reviewing some of their materials. Current plans focus on developing a better rapport with the environmental groups.

The Technical Department staff are highly motivated and very dedicated professionals who are making significant contributions to the chemical industry interests.

MAJOR ACCOMPLISHMENTS

Rather than repeat the many accomplishments in each subject area, you are directed to each division's report. It is somewhat staggering to see how much can be accomplished when a dedicated group of company volunteers and a dedicated professional staff work in unison.

The Technical Department conducted orientation programs for new committee members which greatly eased the transition process. Based on last year's experience, we will be upgrading that program and expanding it.

We have a much better working relationship with both the political appointees and the career governmental staff. The latter is the result of several years of working with the staff and only a minor contribution from the new Administration. CMA is recognized as one of the leaders in industry advocacy by the press, the Administration and our adversaries.

The overall department management has eased from a crisis mode into a maturing management system. It was necessary to recruit and train the majority of the staff in a three-year period as well as working with the committees as they adjusted to a new system. It was not an entirely smooth road, but the overall operating results are excellent. What problems exist are minor, and are well underway to a solution.

The Technical Department is working with the new State Activities program and will be providing technical assistance whenever possible.

This summer we used college students instead of temporary employee contracts to assist during vacations. That worked well, and we will continue the program. A company intern was used as a staff person on a one-year assignment. We were pleased with his performance, and would consider other temporary assignments to train company personnel and to reap the benefit of company experience.

With the assistance of George Ingle, the Technical Breakfasts are becoming more popular. It is common to see as many as 50 technical people from government, industry, embassies and other trade associations attend these functions. A topic of regulatory or legislative significance is discussed at each session and the technical aspects are debated by the audience. It is a rather unusual concept and one of the few occasions where the technical community in Washington meet with an opportunity to have a dialog.

The Technical Director has presented addresses to:

- International Symposium on Analytical Chemistry --
Plenary Address
- University of Akron -- Debate with Nader Staff
- New York State Public Health Association --
Economics of Worker Protection
- Society of Women Engineers -- Role of Trade
Associations
- Lambton Industrial Society -- Hazardous Waste
Management
- Conference on Uncontrolled Hazardous Waste Sites --
Degree of Hazard -- Plenary Address
- National Solid Waste Management Association --
Degree of Hazard
- Houston Rotary -- The Politics of Science
- American Chemical Society -- Plenary Address --
Industry's View of Superfund
- Tanners' Council of America -- Luncheon Address
Science in Governmental Regulations
- Maritime Association -- Luncheon Address on
Superfund
- Water Institutes and Water Agencies of the Southeast
-- Luncheon Address on Industrial
Perspectives on Control of Pollution from
Toxic Chemicals
- Washington Journalism Center -- Conference on Health
and the Environment
- Presearch Inc. -- Conference on Ocean Resource Use
in the 1980's (Waste Disposal Pollution)

The Technical Director has done media work in the following areas over the past year:

- CBS magazine -- network
- NBC news -- network
- Philadelphia (media tour and special show)

Providence, RI/ Boston, MA (two media tours)
Detroit (media tour and special 1-hour debate with
Michael Brown)
Tulsa, OK/Houston, TX/ Dallas, TX (media tour)
Los Angeles, CA/San Francisco, CA (media tour plus
special 1-week news feature on Channel 2)
New York, NY (special shows)
Springfield, MA (special feature)
Columbia, NC (special feature)

GOALS FOR 1981-1982

- o Better training of task group leaders and members.
- o Improve the committee chairmen's orientation program.
- o Continue to improve staff training.
- o Give staff members a company orientation by field visits and company briefings.
- o Investigate the use of telephone conferencing to eliminate short meetings.
- o Encourage better committee planning for the new advocacy.
- o Smooth the budget development process.
- o Analyze the problems with CMA assuming voluntary standards-setting role in lieu of government regulations.

LONG-RANGE GOALS

- o Develop a staff that understands the industry, trade associations and the federal establishment.
- o Develop more efficient ways to process papers and written materials (a review of optical scan, for example)
- o Develop a better working relationship with environmental advocacy groups.
- o Investigate those areas where computerization could assist the department's operations.
- o Work to improve the company understanding of the staff function.
- o Develop a better interlocking with outside groups that will help the industry.

PROBLEMS AND PROPOSED RESOLUTIONS

The office of the Vice President-Technical Director is understaffed. It consists of the Vice President and two secretaries. In order that the Vice President can perform the outside functions which are necessary to CMA interests, it is essential that an internal person assume the duties of administration. Presently, the Vice President spends most weekends doing the administrative duties that cannot be performed during the normal working schedule. This allows almost no time for the conceptual thinking that is necessary for the long-range growth of the department. Therefore, an Assistant Technical Director who will oversee the routine operations of the department should be added to the immediate staff of the Vice President.

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There is a potential problem with the Technical Department support to the State Activities program. We are staffed for our role with the Federal Government, but if state activities require much support from this department, it may be necessary to increase staffing. It will take some operational experience to determine how much technical support will be required by the new activity -- however, if the Reagan Administration is successful in transferring a large proportion of regulatory authority to the states, our role could be considerably greater than we are currently structured to handle.

TECHNICAL ADMINISTRATION STAFF

Geraldine V. Cox received her B.S. in Biology and her M.S. and Ph.D. in Environmental Sciences from Drexel University in 1966, 1967 and 1970 respectively. She started working at Raytheon Oceanographic & Environmental Services in 1970 and performed many environmental surveys and analyses during her six years at Raytheon. She worked on deep water port and supertanker design, refineries, petrochemical wastewater treatment feasibility designs and power plant environmental studies, to name just a few. She served as Special Assistant to the Secretary of Labor during both the Carter and Ford Administrations while she was a White House Fellow. She then went to the American Petroleum Institute where she was a staff executive in environmental biology. She is completing her third year in February as CMA's Vice President and Technical Director.

OTHER WORK EXPERIENCE

Lecturer, University of Pennsylvania School of Nursing
Laboratory Supervisor, Drexel University
Food Technologist: Keebler Biscuit Co., C. Schmidt & Sons
Instructor, Sanitary Microbiology Laboratory, Drexel University

PROFESSIONAL AFFILIATIONS

Air Pollution Control Association, 1978-present
American Chemical Society, 1968-1972 and 1979-present
Member, Committee on Environmental Improvement,
1980-present
American College of Toxicology, charter member
1978-present
American Institute of Chemists, member 1971-1975 (Certified Chemist, 1971); Fellow, 1979-present;
Long-Range Planning Committee, 1981
American Fisheries Society, 1978-1980
American Society of Limnology and Oceanography, 1970-1980
American Society for Testing and Materials, 1977-present
Member, D-19, E-35, E-47, including Nomination
Committee E-47

Association of Environmental Laboratories, 1974-1976
 Vice President, 1974-1976
 Member of the Board, 1974-1976
 Federation of Organizations for Professional Women,
 1980-present, Board of Directors, 1980-present
 International Society of Petroleum Industry Biologists,
 1977-1980 Convention Chairman, 1979
 Member, Membership Committee 1977-1980
 Marine Technology Society, 1970-1974
 Water Quality Committee, 1970-1974
 Chairman, Marine Bioassay Workshop, 1972
 Society of Environmental Toxicology and Chemistry,
 1980-present
 Society for Occupational and Environmental Health, 1979-present
 Society of Women Engineers, 1976-present
 Representative to Federation of Organizations for
 Professional Women, 1980-present
 Water Pollution Control Federation, 1967-present
 Chairman and Founder, Marine Water Quality Committee,
 1975-1980
 Chairman, Oil Spill Studies: Strategies and Techniques
 Workshop, 1975
 Chairman, Ocean Outfalls Seminar, 1978
 Member, Toxic Substances Committee, 1978-present
 Member, Program Committee (Session Chairman), 1974-1979
 Member, Federal Association Program Committee, 1980

ADVISORY PANELS

Conservation Foundation Dialogue Group on Toxic Substances,
 1979-present
 Co-Chair. Dialogue Group on Hazardous Waste Disposal,
 1981
 Drexel University, Environmental Studies Institute Advisory Com-
 mittee, 1980-present
 EPA International Scientific Advisory Council on Ocean Incineration,
 1976
 National Academy of Sciences, National Research Council, 1977-1980
 Air and Water Measurement Panel, National Bureau of
 Standards
 Southern California Coastal Water Research Project
 Project Science Advisor, 1979-1980
 U.S. Chamber of Commerce Environment Committee, 1979-present
 U.S. Coast Guard
 Chemical Transportation Advisory Committee, 1980-present
 U.S. EPA Research Advisory Panel on Solid Wastes 1980

HONORS

White House Fellow, 1976-1977
 One of 10 Outstanding Young Women of America, 1975
 Harriet E. Worrell Award (Outstanding Alumna) Drexel University,
 1977
 Who's Who Among American Women, 1976

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American Men and Women of Science, 1970-1975
Panhellenic Woman of the Year, Drexel University, 1966
Who's Who in American Colleges and Universities, 1966
Who's Who in Ecology
Phi Kappa Phi, 1969-present
Key and Triangle Drexel Women's Leadership Honorary, 1965
Author of the year 1974, Raytheon
Governor's Citation for Professional Recognition, Rhode Island
1975

COMMUNITY ACTIVITIES

Drexel University
Washington Area Fund-raising Chairman, 1977
Area Alumni Advisor, 1976-present
Boy Scouts of America
Merit Badge Counselor, 1975-present
International Rescue Committee, Inc.
D.C. Advisory Committee, 1981
Afghan Committee 1981
White House Fellows Alumni Association, 1977-present
Alpha Sigma Alpha, 1963-present
Chairman, Development Committee, 1980
Chairman of Advisors, 1978-1980
National Executive Vice President, 1972 to
1976
Province Director, 1970-1973
Chapter Advisor, 1966-1970
Chapter President, 1965-1966

PUBLICATIONS

22 publications including editing two books.

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B

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BIOMEDICAL AND ENVIRONMENTAL SPECIAL PROGRAMS

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1.0 MISSION

The mission of the CMA Biomedical and Environmental Special Programs Division, (Special Programs) is to provide manufacturers, processors, and/or users of a chemical or chemicals with the opportunity to support collectively research and/or advocacy on specific chemicals. When referring to Special Programs, advocacy involves external communication, not designed solely for information exchange, that relates to existing or developing regulations, legislation or litigation. CMA serves participating companies by providing proper and effective administration of programs.

Scientific information developed through research programs should promote the health and safety of the general public and of workers involved in manufacturing, processing, and using these chemicals. All significant findings and reports of CMA-administered research programs are available to the public in a timely manner.

2.0 DIVISION OVERVIEW AND SUMMARY OF ACTIVITIES

CMA approved the first "special project" in 1972. The initial special projects were exclusively research oriented. The intent at that time was for CMA to collect and disburse the necessary funds, contract for the research to be done, and provide meeting facilities and surveillance over the conduct of the meetings. The time requirements on CMA staff were expected to be minimal since the participating companies would provide all technical expertise and management skills necessary to conduct the programs. The administration of these programs was assigned to CMA secretaries of several standing committees.

The number of special programs administered by CMA increased at a moderate rate from 1972 and 1979. By the end of 1979, CMA was administering to seventeen special programs. Since 1980, requests for CMA to undertake new special programs have increased considerably. This increase is due mainly to increased activities related to the Toxic Substances Control Act, Clean Air Act and Clean Water Act. The Special Programs Division presently coordinates research and/or advocacy for twenty-three special programs.

CMA took its first steps toward advocacy in 1977 when the Benzene Program Panel was formed in response to a worker-exposure standard proposed by OSHA. Industry believed that the scientific studies on which this standard was based were flawed. The Benzene Panel's Charter was to develop a sound technical base that could be used by industry to challenge the proposed regulations. The Benzene Panel's Charter was expanded in November 1978 to allow the Panel to represent the interests of the members of CMA before federal and state agencies in all matters relating to safety and health issues arising out of the production, reaction, release, packaging, repackaging, storage, transportation, handling or use of benzene. Since 1980, fifteen program panels have broadened their charters to include advocacy or begun programs which included advocacy.

In September 1979, the CMA Executive Committee authorized the formation of a Special Programs Advisory Group (SPAG). SPAG was subsequently given the status of Special Committee which is now known as the Special Programs Advisory Committee (SPAC). Three major responsibilities of SPAC are: (1) to review requests for individual product advocacy by special program panels and determine that appropriate conditions for these advocacy positions are met; (2) to review each ongoing special program at least once a year to provide guidance based on SPAC members' expertise; and, (3) to make certain that advocacy actions of each Special Program are in harmony with CMA Standing Committee positions. Appendix A lists current members of SPAC. During 1981, SPAC completed review of all ongoing special programs.

In addition, in 1980 and 1981, SPAC approved CMA undertaking new special programs on arsenic, ethylene oxide, glycol ethers, ketones, polychlorinated biphenyls, and zinc dialkyl dithiophosphates.

Appendix B lists all special programs undertaken by CMA to date. Appendix C lists companies that are currently participating in special programs. Appendix D summarizes the status of biological sciences research programs and Appendix E summarizes the status of ongoing fluorocarbon research programs.

3.0 STAFF ORGANIZATION AND RESPONSIBILITIES

The Special Programs Division has a staff of thirteen, including a Director, five program administrators, a program coordinator, five secretaries, and one word processor. One program administrator and one secretary devote their time exclusively to the Fluorocarbon Program. The other four program administrators and four secretaries are responsible for the remaining two programs. Figure 1 outlines the organization of Special Programs with respect to both the staff and the specific programs. Biographical sketches of key personnel are included in Appendix F.

Program administrators prepare for and attend panel and task group meetings, prepare records of meetings, and write and administer all contracts in their respective areas. In addition, program administrators:

- o maintain awareness of pertinent regulations relating to panel's activities;
- o communicate with government agencies on scientific and regulatory matters;
- o coordinate information flow to and from the agencies, the companies, other trade associations and academic communities;
- o coordinate the development of advocacy and regulatory position papers with appropriate CMA staff, standing committees, and outside consultants; and,

- o provide monitoring and auditing services for ongoing research projects.

The Special Programs Division keeps the office of General Counsel informed of the status of ongoing panel activities.

4.0 SUMMARIES

4.1 Special Program Advisory Committee

The Special Program Advisory Committee (SPAC) was formed to provide the Program Panels with multi-disciplinary expertise in areas of scientific research and governmental advocacy. SPAC reviews each special program on an annual basis and once a year reports to the CMA Executive Committee on the progress of each program.

Controversies which exist either within a panel or between staff and panels which cannot be resolved at staff level, are brought to SPAC for review and recommendation. SPAC reviews all new and revised programs for consistency with Association policy.

4.2 Acrylonitrile (AN)

The Acrylonitrile Program is concerned with the epidemiology, toxicology, and environmental aspects of processes involving acrylonitrile, its copolymers and its end products. The program was begun in 1974 to develop additional data on the toxicology of AN. This was accomplished through animal exposure studies by inhalation and ingestion.

An epidemiology study was not conducted because of lack of specific exposure data for most of the period to be studied as well as difficulties associated with designating a suitable control group. Several participating companies conducted their own internal epidemiology studies, three of which have been published in detail.

FDA has been interested in food-contact applications of AN polymers, especially beverage bottles. However, the Panel did not assume an advocacy position on this issue. The Society of Plastics Industry conducted advocacy related to OSHA regulations on AN, but CMA was not involved.

As a result of proposed regulations by EPA in 1980, the monomer and polymer producers decided to charter a new organization under SOCMA to fulfill the necessary advocacy role. This new group will also perform any future research on

Acrylonitrile. The CMA panel voted to disband upon completion of its current research.

4.3 Allyl Chloride

Concern over the carcinogenic hazard attributed to vinyl chloride prompted the formation of the AC Program Panel in January, 1976. The panel has so far undertaken three research projects: a teratology study, a pharmacokinetic and metabolic study and a 90-day inhalation probe study. The need for additional research will be determined after the results of these studies are evaluated.

4.4 Arsenic (AS)

An Arsenic Program Panel was established in the first quarter of 1981. The panel's objectives are to: 1) gather information; 2) conduct necessary research to compliment existing information; 3) educate regulators; and 4) undertake regulatory advocacy.

The panel's first priority was to sponsor an arsenic symposium and an in-depth critical literature review on the health effects associated with arsenic. The symposium, scheduled for November 4-6 in Gaithersburg, Md. is being cosponsored with the National Bureau of Standards. Session topics include industrial sources and uses of arsenic, biomedical and environmental perspectives, and epidemiology.

The literature review is underway and should be completed in November 1981. The panel may initiate research studies based on needs identified in this review and may undertake advocacy regarding present and proposed arsenic standards.

4.5 Benzene (B)

The Benzene Program Panel was formed in November 1976. The Panel assessed the data used by NIOSH and OSHA in proposing workplace standards for benzene, developed its own recommendations, and gathered additional data to substantiate establishment of a standard.

The panel continues to be concerned with expansion of the toxicological and epidemiological data base, development of industry guidelines for workplace standards, and health and safety aspects of EPA's proposed National Emission Standards for Hazardous Air Pollutants (NESHAP).

The panel completed a benzene reproduction study which showed no compound-related adverse effects in male and female rats exposed to levels up to 30x the present workplace standard. CMA and the American Petroleum Institute have initiated an extensive 90-day inhalation study of benzene toxicity in rats and mice which will be used to set dose levels for a subsequent

two-year chronic benzene study. An epidemiology study of approximately 14,000 workers in nine plants should be completed in 1982.

4.6 Butylated Hydroxytoluene (BHT)

The BHT Panel was formed in response to a proposed interim regulation issued by the FDA in May, 1977. The panel's goal is to collect toxicological information on BHT and to recommend research to fill any data gaps which might exist.

An Agency Proposal Pending was published on December 31, 1979, but the final rule is still not out. The panel expects FDA to recommend that only a 90-day subchronic study be undertaken. The panel is waiting for U.S. government action before taking further action on BHT.

The French government recently began phasing out BHT as a direct food additive and is at present reviewing the use of BHT as an indirect additive. The joint FAO/WHO Expert Committee on Food Additives recently extended the temporary Average Daily Intake (ADI) for BHT, pending receipt of additional testing data.

4.7 Chlorobenzenes (CB)

The Chlorobenzenes Program Panel began its program in 1974 with the conduct of a worldwide literature search on available health data regarding monochlorobenzene (MCB), ortho-dichlorobenzene (ODCB) and para-dichloro benzene (PDCB). Since that time, the panel has been concerned with expanding the toxicological data base on these three compounds and has recently added a fourth (1,2,4-trichlorobenzene) to a proposed test program.

In October 1980, the panel initiated a series of teratology studies on MCB, ODCB and PDCB in rats and rabbits. To clarify results obtained in the MCB study in rabbits, a follow-up study was conducted in this species. A draft final report on both MCB studies is expected by the end of the year. The ODCB research was completed and interim data are being assembled; animals go on test in the PDCB teratology study in November 1981.

The panel has worked closely with the Chlorobenzenes Producers Association (CPA) in formulating comments on EPA's proposed rules for testing of chlorobenzenes under TSCA Section 4(a). The CPA has held a series of discussions with EPA in an effort to develop a voluntary industry-sponsored testing program in lieu of a formal test rule. A proposal outline was developed and submitted to the Agency. If approved, the CPA has asked the panel to provide funding and administrative for the program.

4.8 Epoxy Resin (ER)

The Special Program on Epoxy Resins was approved in July, 1977. The panel was formed to evaluate the available health effects literature on Epoxy Resins and to sponsor necessary research. Initially, the panel decided to concentrate on Bisphenol-A epichlorohydrin-derived epoxy resins.

The panel is initiating an advocacy role by requesting that OSHA remove Bisphenol A diglycidyl ether from OSHA's candidate carcinogen list.

4.9 Ethylene Dibromide (EDB)

Concerned about possible government regulatory action, the panel was formed in 1979. On December 14, 1977, EPA issued a Notice of Rebuttable Presumption Against Registration (RPAR). The agency concluded that presumptions for oncogenicity, mutagenicity and reproductive disorders had not been rebutted.

A subchronic inhalation study conducted by Dow Chemical Toxicology Research Laboratory showed that repeated subchronic exposure of rats to 10 or 40 ppm of EDB induced pathologic changes in the respiratory epithelium of the nasal turbinate. Subsequent post-exposure phase revealed a lack of progression of the lesions, with almost complete reversion toward normal histologic appearance of the nasal turbinate.

Two additional studies were conducted by the National Cancer Institute (NCI) and the National Institute for Occupational Safety and Health (NIOSH). The panel conducted third-party auditing of both of these studies. The independent auditor found that both studies were of acceptable quality and their findings valid. Since EDB was shown to be carcinogenic in both studies, there is no need for either continued research or an advocacy program. The panel therefore decided to disband. However, the panel has been reactivated as a result of the National Brotherhood of Teamsters' petition to OSHA to lower the current worker exposure standard from 20,000 ppb to 15 ppb.

4.10 Ethylene Dichloride (EDC)

The Ethylene Dichloride Program Panel was formed in February, 1975 to evaluate the adequacy of knowledge relating to EDC. The panel initiated a chronic inhalation, a metabolic, and a teratogenic study in experimental animals. The Panel decided to disband, pending the acceptance of all final reports on this research. This decision was reversed when it was learned that EPA was considering proposing a TSCA Section 8(a) rule.

4.11 Ethylene Oxide (EO)

CMA 054947

A study conducted at Bushy-Run labs showed Ethylene Oxide to be carcinogenic in rats. Industry was interested in gathering

information on the safe handling of Ethylene Oxide which led to the formation of the Ethylene Oxide Industry Council on July 30, 1981. The Council operates through an Executive Committee and four operating committees: Scientific, Regulatory, Finance and Membership, and Communications.

The Council is developing information regarding responsible industry programs to: 1) control exposure to ethylene oxide; 2) to develop relevant scientific, technological and economic data; and, 3) to cooperate with other national and international organizations having similar objectives. The Council will present this information and data to any United States federal, state or municipal governmental body considering regulatory controls on ethylene oxide so as to assure that such standards, regulations or policies, are reasonable, scientifically sound, and economically and socially effective.

The Council developed a response to the petition filed by the Public Citizen Health Research Group and the American Federation of State, County and Municipal Employees to lower the exposure standard for ethylene oxide. The petition asked that the eight hour TWA be lowered from 50 ppm to 1 ppm and that a short-term exposure level of 5 ppm be established. Representatives of the Council met with OSHA officials on September 2 to discuss industry's concern regarding the petition. On September 29 OSHA denied the petition.

4.12 Fluorocarbons (FC)

The Fluorocarbon Program was formally organized in the Spring of 1973 with essentially all of the Free World producers of chlorofluorocarbons (CFCs) supporting the effort. The panel's initial purpose was to determine the fate of CFCs in the atmosphere and the effects they may produce on plants or animals. There was no suspicion of their effect on the stratosphere.

With the publication of the Ozone Depletion Theory in June, 1974 the Program was expanded and accelerated. To date, over \$10,000,000 has been spent on this research. There is no indication that the participants intend to curtail this effort in the immediate future.

The panel limits its funding to scientific research and its advocacy to dissemination of research results and interpretation of the state of the science. Legislative and regulatory advocacy is handled by a coalition of CFC producers and users, the Alliance for Responsible CFC Policy. The Alliance depends on the Fluorocarbon Program Panel for scientific data.

4.13 Glycol Ethers (GE)

CMA 054948

The Glycol Ethers Program was formed on June 26, 1980 and is concerned primarily with the alkyl and dialkyl ethers of ethylene glycol and diethylene glycol, selected ethers of propylene

glycol, and their acetic acid esters. The panel conducted a review and evaluation of the published and available unpublished literature on health and environmental effects. As a result of the literature review the panel has developed a multi-phase testing program. This program includes testing of: Ethylene Glycol Monomethyl Ether (EM), Ethylene Glycol Monobutyl Ether (EB), and Ethylene Glycol Monoethyl Ether (EE) in 1981 (Phase I) for teratology and possible reproductive effects. Phase II will begin in 1982 and includes teratology studies on: Ethylene Glycol Monoethyl Ether Acetate (EE Acetate) and Propylene Glycol Monomethyl Ether (PM). Phase II also includes a subchronic study of EE and a research study still under development, which will allow a comparative assessment of glycol ethers with their acetates. A Phase II testing program on other glycol ethers may be developed in 1982.

The Glycol Ethers Program Panel currently is considering developing exposure data and has begun a liaison program with NPCA and CSMA. The panel is also considering what role, if any, they wish to play in an advocacy program with EPA and/or OSHA. Current advocacy activities involve interactions with NIOSH, ACGIH, and ECETOC.

4.14 Ketones (K)

In 1979 five ketones, methyl ethyl ketone (MEK), methyl isobutyl ketone (MIBK), mesityl oxide (MO), isophorone and cyclohexanone, were recommended for testing under Section 4(e) of TSCA by the Interagency Testing Committee. The Ketones Panel met for the first time on January 23, 1980. Their first activity was to assemble all toxicology literature on eight ketones, including the five on the ITC List. Both published and unpublished (from the files of participating companies) studies were reviewed and principal areas of deficiencies in toxicology information identified. Since the Industrial Health Foundation (IHF) already had a program on cyclohexanone, the present scope of the Ketones Panel is limited to the four remaining ketones on the ITC List.

A revised EPA schedule resulted from a ruling in favor of the Natural Resources Defense Council which had sued EPA for non-compliance under Section 4 by not having initiated rule-making within the one year deadline. The suit resulted in deadlines of 1982 for cyclohexanone and 1983 for the remaining four ketones. Further rescheduling resulted in deadlines in mid-1982 for all five ketones. The panel is currently undertaking an advocacy program on four of the ketones on the ITC List: MEK, MIBK, MO and isophorone. The program involves developing use and exposure information, as well as a voluntary test program.

A 90-day inhalation study on methyl isobutyl ketone (MIBK) is currently underway and reproduction and teratology studies are under consideration. The panel will follow closely complimentary

testing on methyl ethyl ketone by CIIT, and methyl isoamyl ketone by Eastman Kodak. The panel has met once with EPA on testing recommendations for ketones under Section 4(a) and is developing a document for submission to the Agency. The document will present summaries of toxicity data on the four ketones and use and exposure information. An overview of the research program will also be included.

4.15 Phosgene (P)

The Phosgene Panel was formed in April, 1975. Its purpose is to maximize safety in the production and use of phosgene, to reduce the possibility of exposure incidents, and to develop effective diagnostic procedures and therapeutic countermeasures. The panel is studying means for monitoring concentrations of phosgene in air, means of evaluating actual exposures to phosgene as a guide to medical treatment, and means of preventing incidents of phosgene release. Toward this objective, the panel has funded:

- o two animal studies and published two papers in the Archives of Environmental Health (These studies suggested possible mechanisms of Phosgene poisoning and candidate therapeutic agents.);
- o a worldwide literature search; and,
- o a third animal study directed toward exposure of candidate therapeutic agents expected to be effective based on the literature search or on results from the first two animal research projects.

In order to improve engineering and safety practices during the manufacturing or use of phosgene, the panel is structuring and conducting four surveys to identify and update this information. Dupont and Dow have each conducted in-house retrospective epidemiology studies on workers exposed to phosgene. The panel does not currently find it feasible to sponsor a prospective study due to the absence of a controlled, phosgene-only exposure.

To improve worker safety, the panel is working with instrument designers and manufacturers to develop instrumentation with maximum sensitivity for both industrial (process) and personal monitoring, develop protective clothing, and self contained breathing devices. The panel is also exploring improved in-plant safety practices and developing optimal post-exposure diagnostic procedures and therapeutic countermeasures.

4.16 Phthalate Esters (PE)

CMA 054950

The CMA phthalate Esters Program Panel, which was formed in 1972, originally concentrated its efforts on studying the

environmental effects of phthalates. Extensive literature surveys at that time indicated little or no concern over the health effects of phthalates. The Interagency Testing Committee recommended only environmental testing on the phthalate ester class of compounds. Under the provisions of Section 4 of the Toxic Substances Control Act (TSCA), EPA could develop test rules for environmental testing; however, the phthalate esters panel began development of a comprehensive voluntary environmental effects test program.

As a result of a 1980 draft report from the NCI to the National Toxicology Program which shows that di-2-ethylhexyl phthalate (DEHP; also widely known as DOP) causes hepatocellular carcinoma at high dose levels in laboratory rodents, phthalate esters received increased attention from regulatory agencies. With the disclosure of the new NTP findings, the Program Panel expanded its efforts to include a comprehensive testing program to address the human health concerns. The goal was to develop a comprehensive voluntary test program that would develop test data required under Section 4 of TSCA, but without the imposition of mandatory test rules.

The first phase of the comprehensive environmental effects and human health effects testing program is ready to be implemented. The human health effects portion has been designed to examine a limited number of compounds on a risk assessment basis. The studies which comprise this phase of the program will generate sound scientific data that can be applicable to phthalate esters as a class, rather than to specific chemicals. Allocation of costs, was developed to include all the affected industries, phthalate producers, raw materials suppliers and phthalate users.

The environmental effects testing portion, includes the 14 phthalate esters produced in large volume. The program includes acute testing for all 14 phthalates in three species. Additional acute and chronic test data will be developed for those esters for which test data is not already available. The Phthalate Esters Panel has held several discussions with Mr. Newburg-Rinn of EPA's Test Rules Development Branch. As a result of these discussions, EPA held a public meeting on September 15, 1981 to propose acceptance of the Panel's Voluntary Test Program. Final acceptance awaits receipt of written comments from the public and some further review within the Agency.

In a response to a Citizen's Petition filed under Section 21 of TSCA, the EPA Office of Pesticides and Toxic Substances conducted a priority review assessment of DEHP which could result in a 4(f) Action being taken by the Agency. The CMA Phthalate Esters Panel is currently working with EPA on this issue.

Phthalate and adipate esters are also of interest to three Bureaus within the FDA, the Bureau of Foods, the Bureau of

Biologics and the Bureau of Medical Devices. The Bureau of Biologics and the Bureau of Medical Devices are primarily interested in DEHP use in flexible plastics that come in contact with blood, blood elements or intravenous solutions.

The Bureau of Foods regulates DEHA for use in plastics that come in contact with foods, and DEHP for use in plastics that contact non-fatty foods. In addition, other adipates, di-(C₇, C₉-alkyl) adipate and di-n-alkyl adipate (made from C₆, C₈, C₁₀ alcohols) are sanctioned for use in foods, but the sanctions on these latter compounds were based upon safety of DEHA.

In June 1981, a new Task Group (FDATG) was formed within the Phthalate Ester Panel, to interact with FDA on issues relating to adipates and phthalates. At that time the Bureau of Foods was preparing a strategy document for submission to the FDA commissioner which could have resulted in a restriction or ban of DEHA in food contact applications. The Phthalate Esters FDATG met with representatives of the FDA and successfully delayed the strategy document. The FDATG is currently preparing a detailed review of DEHA toxicity data and developing a voluntary testing program which FDA could accept in lieu of an interim regulation or ban on DEHA. Since the Phthalate Esters Panel was originally organized and funded to address EPA's concerns, the FDATG activities will be funded separately.

The panel faces the challenge of presenting an industry consensus on a class of compounds. Individual participating companies have diverse interests, but all have a common goal--to minimize the regulatory action on these substances by responsible, voluntary programs supported broadly.

4.17 Polychlorinated Biphenyls (PCBs)

The recent decision in EDF v. EPA, NO. 79-1580, set aside two parts of EPA's regulation pertaining to PCBs. The Court found that EPA did not present substantial evidence to support its determination to: 1) exclude from regulation materials containing less than 50 ppm PCBs and, b) define the statutorily exempted "totally enclosed uses" as intact and non-leaking. As a result of requests by EPA and EDF the Court decided to stay its mandate for up to eighteen months. Within this time period EPA is to collect information and promulgate a supportable regulation on PCBs.

CMA staff, with advice from the Chemical Regulations Advisory Committee (CRAC) and interested company representatives, negotiated with EPA and EDF to gather information on the 50-ppm incidental generation issue. Since CRAC's budget could not support the data-gathering efforts, the Special Programs Division was asked to assume responsibility for this project. The first panel meeting was held in February, 1981.

The PCB Panel is conducting two surveys of its member companies: 1) 50 ppm incidental generation survey - to characterize the nature and scope of the low concentrations of PCBs; 2) totally enclosed survey - to identify the numbers of pieces of electrical equipment which contain PCBs, the volume of such PCBs, and their concentration levels or ranges. The information obtained from these surveys will be presented to EPA. In August 1981, the panel submitted to EPA an analytical narrative dissertation discussing the problems and costs associated with low level PCB analysis. The panel is currently conducting an analytical round-robin testing program which involves both industry and EPA laboratories.

4.18 Rubber Additives (RA)

The Rubber Additives Program Panel was formed in March 1980 to sponsor research that would expand the toxicological data base on rubber chemicals of interest to participating companies.

As an initial effort, the panel sponsored a series of in vitro tests on purified and commercial samples of 2-(morpholinio) benzothiazolesulfenamide (MBS). Further testing of MBS is presently under consideration, as is the need for testing of other rubber additives.

The panel works in close cooperation with both the WTR (International Working Group on Rubber Chemical Toxicology) and the Rubber Manufacturers Association. All three groups have been concerned with nitrosamines in the workplace and the panel is considering undertaking a testing program on nitrosamine.

4.19 Styrene (S)

The Styrene Program Panel is expanding the styrene toxicology data base. The panel also represents the interests of its members before federal agencies in matters relating to safety and health issues.

A two-year chronic and three-generation reproduction study of styrene in drinking water was completed and released to federal agencies. The panel also reviewed a draft final report on a styrene pharmacokinetic study in mice. The latter study indicated species differences with respect to acute styrene toxicity in rats and mice. The panel presently is assessing how these differences relate to man before proceeding further with a research program.

The panel incorporated a Regulatory Task Group to address EPA's proposed regulations (NESHAP) for benzene emissions from ethyl benzene/styrene plants comments were submitted to EPA on June 1, 1981.

4.20 Titanium Dioxide

In 1977, Du Pont initiated a review of the literature on titanium dioxide toxicity and concluded that further information was needed to answer possible questions which might be directed at titanium dioxide. The impact of the Toxic Substances Control Act also raised concern as to the adequacy of existing information.

The panel has tentatively concluded that a historical mortality study is not justified at this time. The panel plans to terminate program activities if no new evidence of human health effects is reported as a result of the two year inhalation studies being conducted by Du Pont.

4.21 Trichloroethylene (TCE)

The Trichloroethylene Program Panel was formed on May 12, 1975 in response to an NCI Memorandum of Alert. The panel's primary concern was a long-term inhalation study. A contract was signed in 1975 with Industrial BIO-TEST Laboratories (IBT) to conduct such a study. The testing performed by IBT resulted in a number of grave inadequacies and a final report was not issued. Therefore, the CMA TCE Audit Task Group prepared an audit report. EPA's Cancer Assessment Group has asked the panel to provide validation of chamber concentrations for the first 12 to 15 months of the IBT study.

The panel is monitoring the progress of the NCI bioassay on TCE which involves several strains of mice and rats.

Although the panel contemplated an epidemiological study, SOCMA determined that a study population for an epidemiologic investigation would be too small to yield statistically significant results. Therefore, such a study was not conducted.

4.22 Vinyl Chloride (VC)

Since 1972, the Program Panel has supported activities related to the accumulation and assessment of health and safety data of vinyl chloride monomer.

After funding several animal studies, the emphasis on research shifted from toxicological investigations to the early diagnosis and clinical management of vinyl chloride-related injuries. The panel is also funding an update of a vinyl chloride epidemiology study of 10,000 workers.

The panel has maintained a close liaison with SPI and several European-based companies. The present interest in polyvinyl chloride (PVC) dust control limits in the UK is being closely followed. Several months ago OSHA requested information on PVC dust; however, no notice has been published or other action taken.

4.23 Vinylidene Chloride (VDC)

The Vinylidene Chloride Program Panel was formed in May 15, 1974 to investigate the potential toxicologic effects and pharmacokinetics of inhaled and ingested VDC in laboratory animals. Dow Chemical, which was planning research on VDC toxicology, agreed to convert its program into an industry-wide effort. The Two-Year Inhalation Toxicity and Oncogenicity Study of Vinylidene Chloride in Rats is still in progress.

The Work Practices Task Group of the panel prepared a Health and Safety Work Practices Guideline for Vinylidene Chloride to minimize exposure to VDC. The Guidelines were sent to the Director of NIOSH and the Project Manager for Criteria Documents at SRI. They received no other distribution.

The panel is preparing to respond to a Health Risk Assessment Criteria document on VDC under preparation by the EPA Criteria and Health Assessment Group. OSHA does not have a standard for VDC and EPA is unlikely to require any further toxicity testing on VDC under TSCA Section 4.

The pharmacokinetics and metabolism research show a species sensitivity of Mouse>Rat>Man. The total data bank indicates oncogenicity is not observed without recurrent tissue damage and without a cytotoxic dose; a tumorigenic response in man would be an improbable event.

4.24 Zinc Dialkyl Dithiophosphates (ZDDP)

The ZDDP Program Panel was chartered in November 1980 to conduct research on this class of oil additives. As a first step, gonadal toxicity studies of three ZDDP compounds were initiated in immature and mature rats and rabbits.

Obvious species differences were observed between rabbits and rats with respect to ZDDP toxicity. Consequently, the panel proposes to conduct a comparative in vivo pharmacokinetic study in the rat, rabbit, and man. A dose-response study is also proposed to determine a no-effect level in rats and rabbits.

In vitro testing of ZDDPs by individual companies has shown that some members of the class have genotoxic potential. The Program Panel is considering conducting mutagenicity/carcinogenicity assays to further assess this potential.

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5.0 MAJOR ACCOMPLISHMENTS

5.1 Chlorobenzenes

Panel toxicologists provided technical input to the Chlorobenzenes Producers Association (CPA) for their submission to EPA in response to EPA's proposed TSCA Section 4(a) Test Rule on Chlorobenzenes. This group of panel toxicologists has continued to work closely with the CPA in the development of a voluntary industry testing program that would be acceptable by EPA in lieu of formal test rule.

Following earlier dialogues between CMA/CPA and EPA a "decision-tree" approach to testing of commercial chlorobenzenes was adopted. The outline for this proposal is now being reviewed by EPA. The testing program as now envisioned would be much more conservative in scope than that originally outlined by EPA in their proposed Test Rule.

5.2 Ethylene Oxide

The EO council is organized in such a way that it is able to respond immediately to emergency situations. A petition to OSHA to issue an emergency temporary standard of 1 ppm was submitted on August 13, 1981. Within two weeks the Council, working on advice from its regulatory and scientific committees and outside council, prepared a precise, detailed response which they submitted during a meeting with OSHA on September 2. This meeting was also attended by the American Hospital Association and the Veterans Association--both of which were anxious to join with the Council to present a united industry position. On September 29 OSHA denied the petition.

5.3 Fluorocarbons

- o The Program has made substantial contributions to the scientific understanding of what is happening in the stratosphere. The calculated ozone depletion at steady state (approximately 100 years from now) has fluctuated between 5% and more than 20%. Current calculations indicate 6%.
- o The Program has achieved a reputation for scientific objectivity and integrity seldom attributed to industry-sponsored effort.
- o There has been cooperation with government agencies throughout the world and with international agencies. Research conducted by government agencies has been funded or co-funded and research with universities or private laboratories has been co-funded with government support.
- o CMA is the only member of the Coordinating Committee on the Ozone Layer of the United Nations Environment Program not representing a national government or an international agency.

- o Perhaps the greatest contribution has been the influence on the government funded stratospheric research, particularly in the U.S. The productivity of government agency research has been improved substantially over the past five years. At least in part this has been due to the methodology followed and advocated by the industry-sponsored program and the oversight and review provided by the Fluorocarbon Program Panel.

5.4 Phthalate Esters

- o The Phthalate Esters Program Panel has developed a voluntary test Program to address potential health and environmental effects of a class of compounds.
- o The panel has worked with the Test Rules Development Branch (TRDB) of the Environmental Protection Agency and has gained their acceptance of the test program. TRDB is currently proceeding with agency review of the program and we expect official acceptance by mid-November.
- o The Panel has worked with Dr. Hernandez, Deputy Administrator of EPA, on the pending 4(f) finding for DEHP. The Panel is optimistic that Dr. Hernandez's office will decide that the data do not warrant a 4(f) finding at this time.
- o The FDA Task Group has developed a voluntary test program for DEHA which is aimed at determining the cause of the bioassay results. This program will be presented to FDA with the hope that the FDA will accept the program in lieu of an interim regulation or ban on DEHA.
- o The FDA Task Group has successfully altered the time table within the Bureau of Foods for regulatory action on DEHA. This delay has allowed FDA and CMA scientists to discuss the scientific issues to develop mutually acceptable regulatory actions to assure public safety and the continued use of an unreplaceable substance, DEHA, in food contact applications.

5.5 Polychlorinated Biphenyls

There has been a spirit of mutual cooperation between CMA and EPA since the beginning of this program. EPA representatives worked with CMA in developing our surveys and presenting a symposium on these surveys to industry and other trade association representatives.

- o CMA obtained the cooperation of almost 50% of its membership in the 50 ppm incidental generation survey.
- o CMA has continued to maintain an open dialogue with other trade associations involved in collecting data for EPA--especially the National Electrical Manufacturers Association and the Edison Electric Institute.

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- o CMA submitted to EPA a narrative dissertation on the problems and costs associated with low level PCB analysis. This report was well accepted by the Agency and received good coverage in several trade publications.
- o In order to insure the objectivity of the data generated by its current round robin, CMA secured the participation of several EPA laboratories in addition to member company labs. It is hoped that the data generated from this cooperative effort will demonstrate to EPA the variability of analytical results which must be considered in writing and enforcing a regulatory cut off level for PCBs.

6.0 GOALS FOR 1981 - 1982

- o to continue working on establishing new contacts within regulatory agencies;
- o to establish better communication with both U.S. and non-U.S. trade associations involved in activities related to Special Programs;
- o to enhance the scientific credibility of CMA by promoting the publication of CMA-administered research in peer review journals;
- o to achieve better recognition of CMA's capabilities by initiating the Special Programs News Letter starting January 1982; and,
- o to establish semi-annual meetings with representatives of other trade associations involved in administration of toxicologic and epidemiologic research.

7.0 LONG-RANGE PLAN

Through much hard work on the part of CMA staff and panel members, CMA-administered research is developing a reputation for its objectivity and integrity. However, there is room for improvement. Special Programs needs to increase the chemical industry's awareness that Special Programs has the expertise to:

- o administer research and advocacy programs; and,
- o provide scientific services which, until recently, have not been available, expected, or requested.

To accomplish this, Special Programs has identified steps which should be taken over the next few years. These include:

- o reducing the work load per program administrator to enable him/her to undertake the challenge of new tasks/programs:
- o encouraging staff, through educational benefits, to expand existing and develop new expertise in science and business management:
- o hiring new staff to complement existing staff in scientific disciplines not already adequately covered:
- o hiring additional support staff capable of assuming a portion of a program administrators non-scientific administrative duties in order to permit the program administrator to devote more time to scientific and liaison functions:
- o playing a larger role in penetrating the Washington scene and interacting with regulatory agencies and professional societies by establishing good professional relationships with peers in the regulatory agencies, the industry, and government-funded research laboratories:
- o utilizing the contacts and experience of individual program administrators more effectively within the Special Programs Division and other Divisions of CMA:
- o completely reevaluating the method of compensating CMA for services provided:
- o developing the flexibility to provide services panels expect and for which they are willing to pay; and,
- o publicizing Special Programs accomplishments and capabilities in:
 - CMA News
 - ChemEcology
 - The newly-proposed Special Programs Newsletter
 - Peer review journals (publication of research results)
 - News releases on significant findings

8.0 PROBLEMS AND PROPOSED RESOLUTIONS

Washington's new regulatory atmosphere has created an exciting challenge for CMA, including the Special Programs Division. Along with this challenge has come new problems which Special Programs must face and resolve. To meet this challenge CMA has been hiring program administrators who, because of their scientific competence and regulatory experience, are on a peer level with panel members. The program administrators' ability to participate in the scientific activities of the panels has been well received by most panels and there is a willingness to compensate CMA for this added contribution. More panels are requesting and some even demanding this participation.

8.1 Program Administrators

To meet the day-to-day demands of managing and administering a program, program administrators frequently perform many of the functions the support staff is capable of performing. To provide administrative functions as well as the scientific activity that both the panels and CMA expects, program administrators are continuously working under stress and heavy overtime which should be reserved for emergency situations.

The increased demands of advocacy has exacerbated the problem.

8.2 Professional Staff Support

The new role of the program administrator as a scientific peer of the panel members necessitates a much stronger secretarial support system. The current overload of straight typing and mailing chores does not allow time for secretaries to assist with the administration burden. The lack of administrative support has resulted in substantial frustration on the part of both program administrators and support staff. Special Program secretaries are capable of proof reading, preparing financial summaries, checking invoices, obtaining staff clearance of documents, and preparing for panel meetings. Inefficiency results when existing talents are not available to relieve an overburdened system. In addition, because of underutilization of secretarial talents, there has been stress and a high turnover rate.

8.3 Word Processing

Special Programs has one stand-alone Lanier unit which is in full-time use. In addition to a full time operator, temporary help is often brought in to operate the word processor after normal office hours. These efforts barely allow us to keep up with our top-priority work: they do not come close to taking full advantage of word processing technology. It is estimated that over 2/3 of typing currently done by secretaries on typewriters could be done more efficiently if word processing were readily available on a timely basis. An increasing number of the temporaries hired, approaching 50%, are trained word processors. However, we have no word processing equipment available to either our temporary help or our secretaries.

The solution appears to be a shared word processing system capable of serving several word processing terminals. More terminals in the word processing room would not allow secretaries to perform their other duties which require them to be at their desks.

8.4 Data Processing

Closely related to the problem of word processing is the problem of data manipulation in program management. Panels often make a commitment of available funds contingent upon some factor such as task force approval of protocol, co-funding becoming available, or successful completion of a previous assignment by a contractor. In such cases special programs must be certain that the total funds committed do not exceed those budgeted for the individual program and committed to CMA by the participating company. Approval of the payment of invoices requires a review of other contractual requirements such as progress reports and the necessity to withhold the specified contractual amount prior to receipt and acceptance of the final report. It is estimated that over one third of the support staff time is involved in hand manipulation of these data.

8.5 Space

Special Programs has already outgrown its office and file space. More office space will be needed to accommodate the staff already authorized and to relieve the current situation where two people are sharing space designated to accommodate one person. The tremendous growth in advocacy has created much more paperwork than had been anticipated and the available filing space has been exhausted.

8.6 Proposed Resolutions

With appropriate word processing and data management equipment, with the filling of already authorized positions and with one additional secretary, it is visualized that the problems discussed can be alleviated for at least a six month period.

To assist the CMA Administration Department in evaluating the most productive and appropriate equipment for Special Programs a detailed analysis is being made of the requirements of the Fluorocarbon Program. These requirements will apply to a lesser degree to the other twenty-two special programs. Central processing with three terminals should meet Special Programs' immediate needs for word and data processing.

9.0 BUDGET

To date CMA program panels have spent \$20,545,483 in research and advocacy programs on 24 families of chemicals (see Table 1).

9.1 Overhead Reimbursement Budget

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CMA charges participating companies the full costs, including overhead, for administration of special programs. The program account is charged \$500 per day for professional staff. This charge includes

both the direct and allocated costs of full time professional and clerical Special Programs staff and routine professional or support assistance from the Technical, Legal, Government Relations, Communications, and Administrative Services Departments.

Other direct costs, such as out-of-town travel, meeting room and program equipment rentals when meeting outside CMA, conference calls, telex, unusually large printing and mailings, etc., are charged as miscellaneous administrative expenses to the program. Other CMA professional staff time, if required to work on specific or non-routine aspects of the program, is charged at the same rate as the program administrator. In addition to an overhead reimbursement of \$500 per day, the CMA Special Programs Division is credited monthly with 0.75% of received but not expended special program funds as interest. Interest received on non-disbursed Special Program funds is used to defray administrative costs not recovered by the daily rate. In the case of the fluorocarbon program, the unexpended funds balance is approximately \$2 million. This has resulted in a special agreement with the Program Panel to credit its funds with interest at 9% and charge a fixed fee of \$16,500 per month from June 1981 to May 1982. This arrangement produces an effective billing rate of \$825 per day instead of the normal \$500 per day. The fixed fee of \$16,500 will be reviewed in March 1982 for fiscal year 1982-1983.

9.2 Panel Research/Advocacy Budget

CMA requires written commitment for the full amount of a study budget from all participating companies before executing study contract(s). A separate account is established to receive and disburse funds for each program.

As a matter of CMA fiscal policy, participating companies are invoiced for a minimum of 50% of the projected fiscal year commitments. Initial invoicing occurs immediately after participating company management approval of the program activities. During the course of the program, additional collections are made as necessary to maintain a reserve from which disbursements are made. Reserves are maintained as low as possible under sound financial management.

A new phase of a program begins whenever there is a change in composition of sponsoring companies. At the completion of any phase of a program, uncommitted funds are carried over to a subsequent phase. If a company voluntarily drops out of a program at the completion of all contracted work, a refund is made if the pro-rated balance of uncommitted funds exceeds \$2,500 for that company. A company which voluntarily drops out of a program during an ongoing study is expected to provide its full financial commitment to the current study phase including any additions or extensions which were approved during the term of its participation.

A financial statement detailing all expenses and commitments is prepared monthly for each program. A copy of the statement is

provided to panel members at their meetings to keep them informed of the financial status of the panel.

10.0 ADDITIONAL RESOURCES REQUIRED

10.1 Personnel

The newly-formed Ethylene Oxide Industry Council required the addition of one program administrator and one secretary. These additions were approved by the Executive Committee at its meeting on September 28, 1981.

Due to the current workload, one additional secretary will be requested (see Section 8.2). This request is based on the assumption of adequate word/data processing.

10.2 Space

More space to accommodate authorized personnel and increased filing needs must be provided.

10.3 Word/Data Processing

A shared word processing system (one capable of operating more than one station) is now essential. In addition to providing the needed word processing capacity, the system should be capable of handling program management requirements. This will reduce the hand tabulation required to keep track of individual program commitments, researcher progress reports, due dates on CMA required actions, participating company's payments, and will aid in preparing the monthly financial status reports on each program. A system with a central processing unit with three terminals is required.

The system should be expandable to handle electronic mail. Not too distant in the future an optical character reader (OCR) to convert typed documents into electronic signals may be justified.

CMA 054963

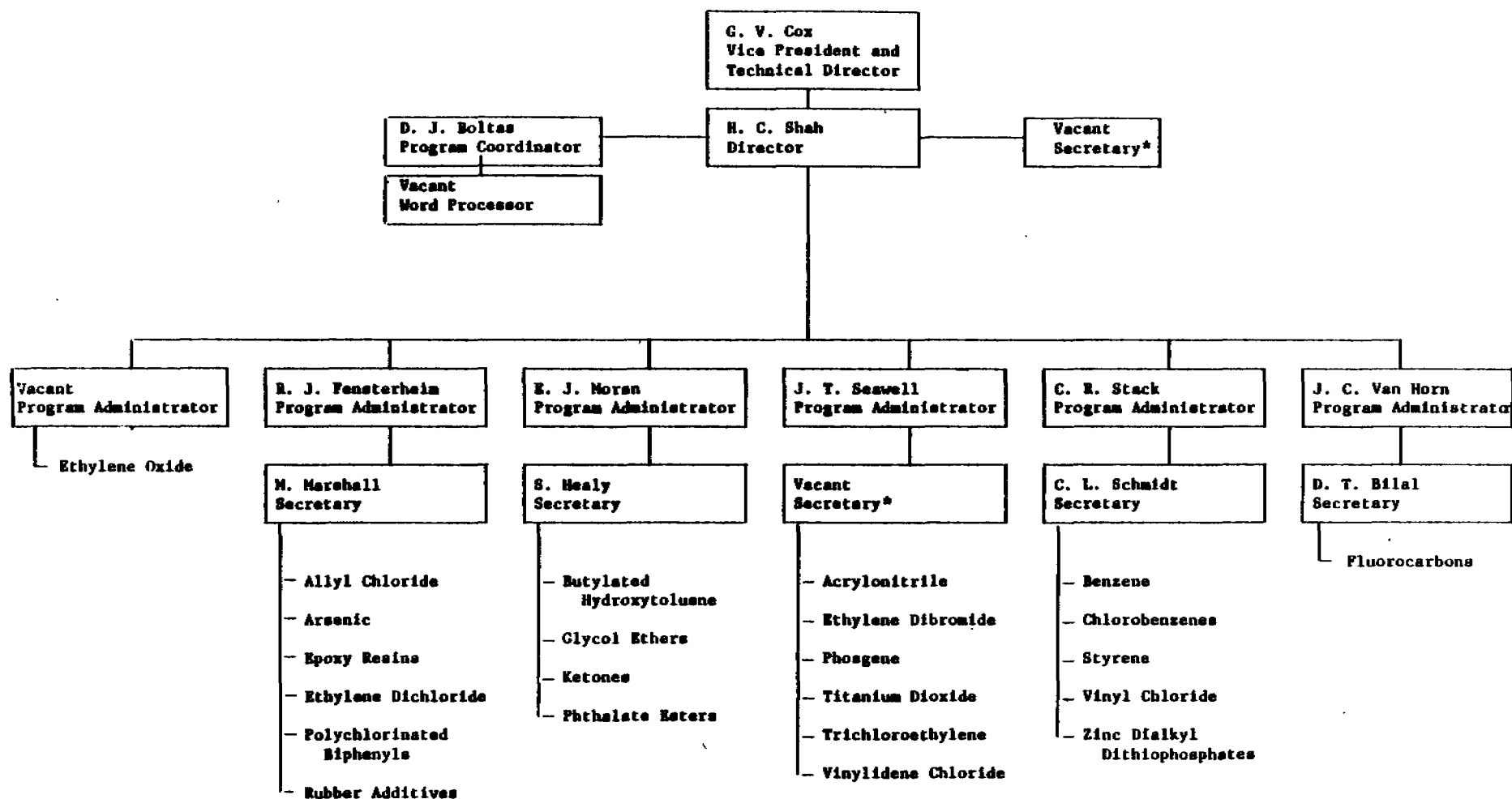
Table I

BIOMEDICAL AND ENVIRONMENTAL SPECIAL PROGRAMS BUDGET SUMMARY^a

<u>PROGRAM</u>	<u>RESEARCH AND ADVOCACY COMMITMENT</u>	<u>ADMINISTRATIVE EXPENSES</u>	<u>TOTAL</u>
Acrylonitrile	\$ 728,484	\$ 79,172	\$807,656
Allyl Chloride	309,500	17,186	326,686
Arsenic	10,000	8,600	18,600
Benzene	3,048,684	112,262	3,160,946
Butylated Hydroxytoluene	21,944	29,467	51,411
Chlorobenzenes	370,722	37,952	408,674
Epoxy Resins	- 0 -	15,059	15,059
Ethylene Dibromide	10,039	43,032	53,071
Ethylene Dichloride	288,100	64,449	352,549
Ethylene Oxide	- 0 -	15,518	15,518
Glycol Ethers	313,000	15,232	328,232
Ketones	208,880	28,977	237,857
Phosgene	217,512	85,728	303,240
Phthalate Esters	186,585	132,628	319,213
Polychlorinated Biphenyls	100,434	18,869	119,303
Rubber Additives	30,725	17,730	48,455
Styrene	708,218	66,545	774,763
Titanium Dioxide	30,725	23,969	54,694
Trichloroethylene	490,506	89,738	580,244
Vinyl Chloride	1,326,562	119,701	1,446,263
Vinylidene Chloride	729,482	57,440	786,922
Zinc Dialkyl Dithiophosphates	<u>79,857</u>	<u>12,207</u>	<u>92,064</u>
Subtotal	9,209,959	1,091,461	10,301,420
Fluorocarbons	9,216,650	569,753	9,786,403
<u>TOTAL</u>	<u>\$18,426,609</u>	<u>\$1,661,214</u>	<u>\$20,087,823</u>

^a Fluorocarbons program from start thru May 30, 1981. All other programs start to to September 25, 1981.

CMA 054964



*shared

CMA 054965

Figure 1 - Biomedical and Environmental Special Programs Division

BIOMEDICAL AND ENVIRONMENTAL
SPECIAL PROGRAMS ADVISORY COMMITTEE (SPAC)

The Committee will: advise the Executive Committee on the acceptance of new programs, ensure that all special programs are conducted in a manner consistent with CMA policy and with the Special Program Guidelines; and, review and make recommendations on all advocacy programs on individual chemical(s) requested by a program panel or staff.

TERM ENDING MAY 31, 1982

H. Donald Feeney..... Borg-Warner Chemical Corporation, International Center, Parkersbury, WV 26101
George J. Levinskas..... Monsanto Company, 800 North Lindbergh Boulevard, St. Louis, MO 63166
Curtis W. Smith..... Shell Chemical Company, P. O. Box 2463, Houston, TX 77001
Otto Sturzenegger..... CIBA-GEIGY Corporation, Ardsley, NY 10502
Chairman*
P. 25 Carl Umland..... Exxon Chemical Americas, P. O. Box 3272, Houston, TX 77001

TERM ENDING MAY 31, 1982

William C. Becker..... The BFGoodrich Company, 6100 Oak Tree Boulevard, Cleveland, OH 44131
Calvin Benning..... Essex Chemical Corporation, 1401 Broad Street, Clifton, NJ 07015
Conrad Kent..... Stauffer Chemical Company, Westport, CT 06880
Myrl E. Miller..... IMC Chemical Group, 421 East Hawley Street, Mundelein, IL 60060
Gary Ter Haar..... Ethyl Corporation, 451 Florida Avenue, Baton Rouge, LA 70801

TERM ENDING MAY 31, 1984

Noble Robinson.....Mallinckrodt, Inc., P O Box 5840, St. Louis, MO 63134

Jerry M. Smith.....Rohm and Haas Company, Spring House, PA 19477

Gary Sunshine.....ICI Americas, Wilmington, DE 19897

Joan E. Young.....Petrolite-Tretolite Division, 369 Marshall Avenue, St. Louis, MO 63119

John J. Zimmerman...ARCO Chemical Company, 3801 West Chester Pike, Newtown Square, PA 19073

Staff Executive: Hasmukh C. Shah

*Through May 31, 1982

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CMA 054967

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LIST OF SPECIAL PROGRAMS

<u>NUMBER</u>	<u>PROGRAM NAME</u>	<u>PROGRAM TYPE</u>	<u>START DATE</u>	<u>COMPLETION DATE</u>
1.	Acrylonitrile	Research	06/20/74	
2.	Allyl Chloride	Research	08/19/75	
3.	Arsenic	Research and Advocacy	01/29/81	
4.	Benzene	Research and Advocacy	02/08/77	
5.	Butylated Hydroxytoluene (BHT)	Research and Advocacy	09/19/77	
6.	Chlorobenzenes	Research	12/16/74	
7.	Epichlorohydrin	Research	08/19/75	08/31/80
8.	Epoxy Resins	Research and Advocacy	01/18/77	
9.	Ethylene Dibromide	Research	03/22/79	
10.	Ethylene Dichloride	Research	12/17/74	
11.	Ethylene Oxide	Research and Advocacy	04/16/81	
12.	Fluorocarbons	Research and Advocacy	04/09/73	
13.	Glycol Ethers	Research and Advocacy	06/26/80	
14.	Ketones	Research and Advocacy	01/23/80	
15.	Phosgene	Research	05/18/72	
16.	Phthalate Esters	Research and Advocacy	02/24/72	
17.	Polychlorinated Biphenols	Advocacy	02/11/81	
18.	Rubber Additives	Research and Advocacy	09/10/79	
19.	Styrene	Research and Advocacy	10/24/74	
20.	Titanium Dioxide	Research	06/13/77	
21.	Trichloroethylene	Research	05/12/75	
22.	Vinyl Chloride	Research and Advocacy	11/16/71	
23.	Vinylidene Chloride	Research	05/15/74	
24.	Zinc Dialkyl Dithiophosphates	Research and Advocacy	10/02/80	

B.27

Appendix B

COMPANIES PARTICIPATING IN SPECIAL PROGRAMS

ABBOTT LABS

Ethylene Oxide

AIR PRODUCTS

Vinyl Chloride

AKZO CHEMIE BV

Fluorocarbons

ALLIED CORPORATION

Fluorocarbons, Ketones, Phthalate Esters, Phosgene

AMAX LEAD & ZINC, INC.

Arsenic

AMERICAN CYANAMID

Acrylonitrile, Phthalate Esters, Rubber Additives

AMERICAN HOECHST

Styrene

AMOCO

Benzene, Styrene, Zinc Dialkyl Dithiophosphates

ANACONDA COPPER COMPANY

Arsenic

ARCO CHEMICAL

Benzene, Phthalate Esters, Polychlorinated Biphenyls

ARCO/POLYMERS

Styrene

ASAHI-DOW LIMITED

Vinylidene Chloride

ASAHI GLASS CO., LTD.

Fluorocarbons, Vinylidene Chloride

ASARCO INC.

Arsenic

ASHLAND CHEMICAL

Benzene

ASSOCIATED OCTEL COMPANY

Ethylene Dibromide

CMA 054969

AUSTRALIAN FLUORINE CHEMICALS PARTY, LTD.

Fluorocarbons

BASF WYANADOTTE

Ethylene Dichloride, Ethylene Oxide, Phosgene, Phthalate Esters.

BECTON DICKINSON

Ethylene Oxide

BETHLEHEM STEEL

Benzene

BORDEN CHEMICAL

Ethylene Dichloride, Phthalate Esters, Vinyl Chloride

BORG-WARNER CHEMICALS

Acrylonitrile, Styrene

BRISTOL LABS

Ethylene Oxide

C-I-L, INC.

Trichloroethylene

CELANESE PLASTICS SPECIALTIES CO.

Epoxy Resins, Ethylene Oxide

CERTAIN-TEED

Vinyl Chloride

CHESEBROUGH PONDS

Ethylene Oxide

CHEVRON

Phthalate Esters, Zinc Dialkyl Dithiophosphates

CIBA-GEIGY

Epoxy Resins

CONOCO CHEMICALS

Ethylene Dichloride, Ethylene Oxide, Phthalate Esters, Vinyl Chloride

COSDEN OIL

Benzene, Styrene

CRESCENT MANUFACTURING CO

Ethylene Oxide

DAIKIN KOGYO CO. LTD.

Fluorocarbons

CMA 054970

DART INDUSTRIES

Butylated Hydroxytoluene

DIAMOND SHAMROCK

Arsenic, Ethylene Dichloride, Polychlorinated Biphenyls, Phthalate Esters, Trichloroethylene, Vinyl Chloride

DOW CHEMICAL

Acrylonitrile, Allyl Chloride, Benzene, Chlorobenzenes, Epoxy Resins, Ethylene Dibromide, Ethylene Dichloride, Ethylene Oxide, Glycol Ethers, Ketones, Styrene, Trichloroethylene, Vinyl Chloride, Vinylidene Chloride

E. I. DU PONT DE NEMOURS & CO.

Acrylonitrile, Benzene, Ethylene Dichloride, Fluorocarbons, Phosgene, Phthalate Esters, Polychlorinated Biphenyls, Titanium Dioxide, Vinylidene Chloride

DU PONT CANADA INC.

Fluorocarbons

ELCO CORPORATION

Zinc Dialkyl Dithiophosphates

EL PASO PRODUCTS COMPANY

Styrene

EASTMAN KODAK

Polychlorinated Biphenyls

ESSEX CHEMICAL (RACON)

Fluorocarbons

ETHYL CORPORATION

Allyl Chloride, Ethylene Dibromide, Ethylene Dichloride, Phthalate Esters, Trichloroethylene, Vinyl Chloride, Zinc Dialkyl Dithiophosphates

EXXON

Benzene, Ketones, Polychlorinated Biphenyls, Phthalate Esters, Vinyl Chloride, Zinc Dialkyl Dithiophosphates

FOXMATIC CORP

Ethylene Oxide

GENERAL ELECTRIC

Phosgene, Phthalate Esters, Polychlorinated Biphenyls

GENERAL TIRE & RUBBER

Phthalate Esters, Vinyl Chloride

CMA 054971

BFGOODRICH

Allyl Chloride, Ethylene Dichloride, Rubber Additives, Vinyl Chloride, Vinylidene Chloride

GOODYEAR TIRE & RUBBER

Rubber Additives, Vinyl Chloride

W. R. GRACE

Vinyl Chloride, Vinylidene Chloride

GREAT AMERICAN CHEMICAL

Vinyl Chloride

GREAT LAKES

Ethylene Dibromide

GULF CHEMICAL CO.

Acrylonitrile, Benzene, Ethylene Dichloride, Styrene, Vinyl Chloride

GULF & WESTERN

Titanium Dioxide

HALCON

Ethylene Oxide

HOECHST AG/AMERICAN HOECHST

Fluorocarbons

HOOVER CHEMICAL

Polychlorinated Biphenyls, Trichloroethylene, Vinyl Chloride

ICI AMERICAS

Ethylene Dichloride, Glycol Ethers, Vinyl Chloride

IMPERIAL CHEMICAL INDUSTRIES PLC

Fluorocarbons, Trichloroethylene

INMONT CORPORATION

Phthalate Esters

ISC CHEMICALS LTD

Fluorocarbons

JAPAN FLON GAS ASSOC.

Fluorocarbons

JOHNSON & JOHNSON

Ethylene Oxide

CMA 054972

KAISER ALUMINUM AND CHEMICAL CORP
Fluorocarbons, Polychlorinated Biphenyls

KALI CHEMIE AG
Fluorocarbons

KENDALL CO
Ethylene Oxide

KEYSOR-CENTURY
Vinyl Chloride

KOPPERS COMPANY
Arsenic, Benzene, Butylated Hydroxytoluene, Phthalate Esters

KUREHA CHEMICAL INDUSTRY
Vinylidene Chloride

LUBRIZOL
Zinc Dialkyl Dithiophosphates

MALLINCKRODT INC
Ethylene Oxide

MICRO BIOTROL
Ethylene Oxide

MITSUI FLUOROCHEMICALS LTD
Fluorocarbons

MOBAY CHEMICAL
Phosgene, Rubber Additives

MOBIL OIL CORPORATION
Benzene, Phthalate Esters

MONSANTO COMPANY
Acrylonitrile, Benzene, Chlorobenzenes, Ketones, Polychlorinated
Biphenyls, Phthalate Esters, Rubber Additives, Styrene, Vinyl
Chloride, Vinylidene Chloride

MONTEDISON SPA
Fluorocarbons, Phosgene

MONTROSE CHEMICAL CORP OF CA
Chlorobenzenes

MORTON CHEMICAL
Vinylidene Chloride

CMA 054973

NALCO CHEMICAL COMPANY

C-6

Ethylene Oxide

NL INDUSTRIES

Titanium Dioxide

OLIN CORPORATION

Glycol Ethers, Polychlorinated Biphenyls, Phosgene, Vinylidene Chloride

OSMOSE WOOD PRESERVING COMPANY

Arsenic

PANTASOTE

Phthalate Esters

PENNWALT

Arsenic, Fluorocarbons, Rubber Additives

PHILLIPS PETROLEUM COMPANY

Benzene

PPG INDUSTRIES

Chlorobenzenes, Ethylene Dibromide, Ethylene Dichloride, Ethylene Oxide, Glycol Ethers, Polychlorinated Biphenyls, Phosgene, Trichloroethylene, Vinyl Chloride, Vinylidene Chloride

POLYSAR LIMITED

Benzene

PRODUITS CHIMIQUES UGINE KUHLMANN

Fluorocarbons

REICHHOLD CHEMICALS

Epoxy Resins

ROHM & HAAS

Vinylidene Dichloride

RUBICON

Phosgene

SALSBURY LABS

Arsenic

SCM CORPORATION

Titanium Dioxide

SHELL CHEMICAL COMPANY

Allyl Chloride, Benzene, Butylated Hydroxytoluene, Epoxy Resins, Ethylene Dichloride, Ethylene Oxide, Glycol Ethers, Ketones, Phthalate Esters, Vinyl Chloride, Styrene, Zinc Dialkyl Dithiophosphates,

SHERWIN WILLIAMS

Butylated Hydroxytoluene

CMA 054974

SHERWOOD MEDICAL
Ethylene Oxide

SHOWA DENKO KK
Fluorocarbons

STANDARD CHLORINE CHEMICAL CO
Chlorobenzenes

STANDARD OIL (OHIO)
Acrylonitrile, Benzene

STANGE COMPANY
Ethylene Oxide

STAUFFER CHEMICAL
Ethylene Dichloride, Phosgene, Phthalate Esters, Polychlorinated
Biphenyls, Vinyl Chloride

STEPEN CHEMICAL
Phthalate Esters

SUN PETROLEUM PRODUCTS
Styrene

SUNSHINE MINING CO
Arsenic

TECKNOR-APEX
Phthalate Esters

TENNESSEE EASTMAN
Acrylonitrile, Glycol Ethers, Ketones, Phthalate Esters, Vinylidene
Chloride

TENNECO CHEMICALS
Vinyl Chloride

TEXACO INC
Benzene, Ethylene Oxide, Glycol Ethers, Zinc Dialkyl Dithiophos-
phates,

TIOXIDE CANADA, LTD
Titanium Dioxide

TOMS RIVER
Phosgene

TRAVENOL LABS
Ethylene Oxide

CMA 054975

UNION CARBIDE
Benzene, Ethylene Dichloride, Ethylene Oxide, Glycol Ethers, Ketones,
Polychlorinated Biphenyls, Phosgene, Phthalate Esters, Styrene, Vinyl
Chloride

UNION OIL OF CA
Vinylidene Chloride

UNIROYAL, INC.
Acrylonitrile, Butylated Hydroxytoluene, Rubber Additives, Vinyl Chloride

USS CHEMICALS
Benzene, Phthalate Esters, Styrene

UPJOHN COMPANY
Phosgene

VULCAN MATERIALS
Ethylene Dichloride, Polychlorinated Biphenyls

WITCO CHEMICALS
Phthalate Esters

WARREN CHEMICAL CO
Ethylene Oxide

9/25/81

CMA 054976

ACRYLONITRILE

Report Title and Contract Number	Contractor	Contract Execution Date	Present Level of Funding	Comments
90-Day Oral Toxicity Study on AN Incorporated in the Drinking Water of Rats (AN 1.0)	The Dow Chemical Company	Oct. 15, 75	\$647,900*	Released Dec. 9, 75
Six Month Oral Toxicity Study Incorporating AN in Drinking Water of Purebred Beagle Dogs (AN 1.0)	The Dow Chemical Company	Oct. 15, 75	*	Released Dec. 9, 75
Pharmacokinetic and Metabolic Profile of ¹⁴ C AN Given to Rats by Three Routes (AN 1.3)	The Dow Chemical Company	Oct. 15, 75	*	Released July 18, 77
Teratologic Evaluation of AN Monomer Given to Rats by Gavage (AN 1.5)	The Dow Chemical Company	Oct. 15, 75	*	Released Nov. 9, 76
U.S. Teratologic Evaluation of Inhaled AN Monomer in Rats (AN 1.6)	The Dow Chemical Company	Oct. 15, 75	*	Released July 28, 78
2-Year Toxicity and Oncogenicity Study with AN Incorporated in the Drinking Water of Rats (AN 1.1 TOX/Ori/2-yr./Dow)	The Dow Chemical Company	Oct. 15, 75	*	Released Feb. 12, 1980
A Two-year Toxicity and Oncogenicity Study with AN Following Inhalation Exposure to Rats (AN 1.2 TOX/Ihl-2 yr./Dow)	The Dow Chemical Company	Oct. 15, 75	*	Released Dec. 22, 1980
Mutagenicity Evaluation of MCA 730 (AN 2.0)	Litton Bionetics, Inc.	Jan. 23, 76	2,200	Released Oct. 22, 76
Microbial Indicator Plate Assay for Mutagenicity on Compound MCA 730 (AN 2.0)	Litton Bionetics, Inc.	Sept. 23, 75	300	Released Oct. 13, 76
Three Generation Reproduction Study of Rats Receiving AN in the Drinking Water (AN 3.0)	Litton Bionetics, Inc.	May 28, 76	78,084	Released Feb. 26, 80

\$647,900 total for seven AN 1. Studies

9-25-81

CMA 054977

Appendix D

ALLYL CHLORIDE

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
90-day Repeated Inhalation Toxicity Study of Allyl Chloride in Laboratory Rodents (AC 1.0-TOX-Ihl-Dow)	Dow Chemical U.S.A.	Nov. 6, 77	\$164,000	Dow submitted a draft final report in April 1981. Dow is currently repeating this study. Final report expected October, 1981.
Protocol for a Long-term Inhalation Toxicity and Carcinogenicity Study of Allyl Chloride in Fischer 344 Rats (AC 2.0 Tox/Ihl/2-yr/Dow)	Dow Chemical U.S.A.	Not executed.		Contract voided before being signed.
Pharmacokinetic Profile of Allyl Chloride (AC 3.0)	The Dow Chemical Company	Aug. 8, 77	86,500	Draft final report pending Panel approval.
Allyl Chloride : Pharmacokinetics and Metabolism Following Administration to CDF-Fischer 344 Rats by Three Routes				
The Effects of Inhaled Allyl Chloride on Embryonal & Fetal Development in Rats and Rabbits (AC 4.0-TER/Ihl-Dow)	The Dow Chemical Company	Aug. 8, 77	59,000	Released Sept. 5, 80

B.37

CMA 054978

D-2

9-25-81

ARSENIC

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
Critical Review of whether Arsenic is or could be Carcinogenic (AS-1.0-LS)	Dr. I. Harding- Barlow	July 3, 1981	\$10,000	In Progress

B.38

CMA 054979

D-3

9-25-81

BENZENE

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
Survey of Benzene Emission Control Costs in the Chemical Industry (B 0.25 ECC-BAH)	Booz, Allen & Hamilton	Nov. 21, 77	\$60,000	Released in 1978
A Historical Prospective Mortality Study of Chemical Workers Exposed to Benzen (B 1.0-Epi-TOMA)	Tabershaw Occupational Medical	July 14, 78	193,064	In Progress
Determination of Time to Steady-State Level During Inhalation Exposure of Benzene by Rats & Mice (B 2.0-Hem-Ihl-B/D)	Bio/dynamics, Inc.	April 16, 79	57,620*	Final report released December 17, 80
Determination of the Concentration of Benzene and its Metabolites in the Blood of Rats and Mice at Various Exposure Concentrations (B 2.0-Hem-Ihl-B/D)	Bio/dynamics, Inc.	April 16, 79	*	Final report released December 17, 80
Determination of Material Balance of Benzene in Rats and Mice (B 2.0-Hem-Ihl-B/D)	Bio/dynamics, Inc.	April 16, 79	*	Final report released December 17, 80
A Dominant Lethal Inhalation Study in Rats with Benzene and A Female Fertility Study in Rats w/Benzene (B 3.0 ff/dl-B/D)	Bio/dynamics, Inc.	Jan. 15, 80	180,000	Released March 10, 81
Audit of B 3.0 (B 5.0-Aud.-B/D-West)	Bob West Assoc., Inc.	Jan. 21, 80	7,000	Final report approved
Agreement with API to Jointly Fund Benzene Inhalation Research	Hazleton Labs			Administered by API
Five-day Acute Benzene(Inhalation Study	CMA 054980	May 5, 80	30,200	Draft final report under review
90-day Subchronic Benzene Inhalation Study		May 21, 80	464,390	In progress
Chronic Two-year Benzene Inhalation Study		May 21, 88	1,339,100	
Pulse dose Inhalation Study of Benzene Toxicity		May 21, 80	519,800**	
Intermittent Exposure/Recovery Benzene Inhalation Study		May 21, 80	166,310**	
Monitoring and Auditing of API/CMA Jointly Fund d Study (B 6.0)	Bob West Assoc., Inc.	May 21, 80	31,200	Administered by API

*\$57,620 total for three B 2.0 Hem-Ihl-B/D Studies

**Will require approval and additional funding

9-25-81

BUTYLATED HYDROXYTOLUENE

<u>Report Title and Contact Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
A Review of the Food Additive, Butylated Hydroxytoluene (BHT 1.0-LS)	The Franklin Institute	April 12, 78	\$21,944	Released June 1, 79

B.40

CMA 054981

D-5

9-25-81

CHLOROBENZENES

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
Worldwide Literature Search on Chlorobenzenes (CB 1.0-LS)	Tracor Jitco, Inc.	Nov. 4, 75	\$15,972	Released March 20, 80
Probe and Teratology of Monochlorobenzene, Paradichlorobenzene and Orthodichlorobenzene: Inhalation Teratology Study in Fischer 344 Rats and New Zealand White Rabbits (CB 2.0-Ter/Ihl-Dow)	Dow Chemical U.S.A.	Oct. 17, 80	285,000	In progress
Teratology of Monochlorobenzene: Inhalation in New Zealand White Rabbits (CB 3.0-Ter/Ihl-Dow)	Dow Chemical U.S.A.		69,750	In progress

B.41

CMA 054982

9-25-81

D-6

EPICHLOROHYDRIN

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
A 90-day Inhalation Study in Laboratory Rodents (ECH 1.0-TOX-Ihl-Dow)	Dow Chemical U.S.A.	Jan. 12, 79	\$126,132*	Released Feb. 28, 79
A 12-day Inhalation Study in Laboratory Rodents (ECH 1.0-TOX-Ihl-Dow)	Dow Chemical U.S.A.	Jan. 12, 79	*	Released Feb. 28, 79
Cytogenic Evaluation of Bone Marrow Cells from Rats Exposed by Inhalation to Epichlorohydrin for four weeks (ECH 1.0-TOX-Ihl-Dow)	Dow Chemical U.S.A.	Jan. 12, 79	*	Released Feb. 28, 79
Pharmacokinetics of Epichlorohydrin Administered to Rats by Gavage or Inhalation (ECH 2.0-PHKS-Ihl/Orl-Dow)	The Dow Chemical Company	Aug. 8, 77	125,820	Released Feb. 29, 79
The Effects of Maternally Inhaled ECH on Rat and Rabbit Embryonal and Fetal Development (ECH 3.0-TFR-Ihl-Dow)	The Dow Chemical Company	Aug. 8, 77	62,930	Released Feb. 13, 80

*126,132 total for three ECH 1.0 Studies

B.42

CMA 054983

1-28-81
Closed

D-7

EPOXY RESINS

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
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No Agreements.

B.43

CMA 054984

9-25-81

D-8

ETHYLENE DIBROMIDE

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
Audit of the EDB Studies conducted at Midwest Research Institute and at Hazleton Labs (EDB 1.0-AUD-HL-MRI-West)	Bob West Associates, Inc.	Oct. 12, 79	\$10,039*	Released Nov. 7, 1980

*Amended 1/29/80 to \$11,000. \$96.14 returned to funds.

B.44

CMA 054985

D-9

9-25-81

ETHYLENE DICHLORIDE

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
Studies on Long-term Effects on Rats and Mice of Ethylene Dichloride, Administered by Inhalation (18 months) (EDC 1.0-LT/Ihl/M.S.)	Montedison, S.p.A.	Jan. 16, 76	\$137,500	Released July 11, 80
Distribution and Metabolism of 1,2 Dichloroethane (EDC) in Experimental Animals (EDC 2.0)	Mario Negri	Oct. 6, 77	30,000	Terminated. Interim report released June 25, 80
The Effect of Inhaled EDC on Embryonal and Fetal Development in Rats and Rabbits (EDC 3.0)	The Dow Chemical Company	Oct. 31, 77	28,000	Released March 25, 80
EDC: Single Generation Inhalation Reproduction Study in Rats (EDC 4.0)	The Dow Chemical Company	Oct. 31, 77	92,600	Released May 30, 80

B.45

CMA 054986

D-10

9-25-81

ETHYLENE OXIDE

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
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No Agreements.

B.46

CMA 054987

D-11

GLYCOL ETHERS

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
Ethylene Glycol Monomethyl Ether 13 Week Vapor Inhalation Study with Male Rabbits (G 1.0-Sub-Ihl-Dow)	Dow Chemical U.S.A.		\$ 60,000	Unexecuted
Ethylene Glyc 1 Monomethyl Ether Inhalation Teratology Probe Study in Rats and Rabbits (G 2.0-Ter-Ihl-Dow)	Dow Chemical U.S.A.		\$120,000	Unexecuted
Inhaled Ethylene Glycol Mono-Ethyl Ether Teratogenic Assessment in Rats and Rabbits (GE-3.0-Ter-ICI)	Imperial Chemical Industries PLC		\$110,000	Unexecuted
Range-Findings Dermal Teratology Study in Rabbits (GE-4.0-Ter- derm-IRDC)	International Re- search and Development Corporation		\$13,000	Unexecuted
Ethylene Glycol Monomethyl Ether; Inhalation Teratology Probe Study in Mice (GE-5.0-Ter-Ihl-Dow)	Dow Chemical U.S.A.		\$10,000	Unexecuted

B.47

CMA 054988

9-25-81

D-12

KETONES

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
Methyl Isobutyl Ketone Vapor 90 Day Inhalation Study in Rats and Mice (K-1.0-Ihl-BRRC)	Bushy Run Research Center		\$208,880	In Progress

B.48

CMA 054989

D-13

9-25-81

PHOSGENE

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
Basic Mechanisms Involved in Phosgene Damage to Lungs (Phase I, Year I) (P 1.0-BM/DP/TC-MSH)	Mt. Sinai Hosp. of Cleveland	Dec. 72	\$30,000	Released Sept. 5, 80
Consultation	M. P. Froolono	Dec. 19, 72	3,000	Completed
Basic Mechanisms, Diagnostic Procedures, and Therapeutic Countermeasures for Phosgene Poisoning in Lungs (Phase II, Year I) (P 2.0)	Albert Einstein College of Medicine	Feb. 26, 75	50,438	Released Sept. 5, 80
T n-day Inhalation Subacute Study (P 2.5)	E. I. du Pont's Haskell Lab	Dec. 19, 75	7,500	Released Oct. 21, 80
Basic Mechanisms, Diagnostic Procedures and Therapeutic Countermeasures for Phosgene Poisoning in Lungs (Phase II, Year II) (P 3.0)	Albert Einstein College of Medicine	July 30, 76	55,305	Released Sept. 5, 80
Consultation (P 3.5 - CONS)	M. S. Froolono	July 26, 76	3,000	Completed
Validation and Extension of Proposed Therapeutic Strategy for Phosgene Poisoning (P 4.0 BM/DB/TC/AECM)	Albert Einstein College of Medicine	August 10, 78	60,669	In Progress
Literature Search (P 5.0-LS-WED)	Dr. Werner Diller	Jan. 20, 80	4,000	Completed
Consultation (P 4.5-CONS)	M. S. Froolono	Jun. 22, 81	3,600	In Progress

B-49

CMA 054990

9-25-81

D-14

PHTHALATE ESTERS

Report Title and Contract Number	Contractor	Contract Execution Date	Present Level of Funding	Comments
Toxicological and Environmental Issues Associated with Phthalic Acid Esters (PE 1.0-LS-HA)	Dr. Rolf Hartung	Dec. 12, 75	\$10,369	Released July 25, 77
Some Effects of Two Phthalic Acid Esters on the Life Cycle of the Midge (PE 2.0)	U. of Missouri	June 15, 76	45,102*	Released Sept. 5, 80
The Effects of Phthalic Acid Esters on Microbial Processes and the Biochemical Cycling of Nutrients in Freshwater Hydrosol (PE 2.0)	U. of Missouri	June 15, 76	*	Released Sept. 5, 80
Characteristics of Various Hydrosols and their Relative Importance in the Degradation of the Ester Di-2-Ethylhexyl Phthalate (PE 2.0)	U. of Missouri	June 15, 76	*	No final report
An Evaluation of the Semicontinuous Activated Sludge Biodegradation Test Using Di-2-Ethylhexyl Phthalate (PE 3.0)	U. of Missouri	Sept. 2, 77	38,200**	Released Sept. 5, 80
An Evaluation of the River Die-Away Biodegradation Test Using Di-2-Ethylhexyl Phthalate (PE 3.0)	U. of Missouri	Sept. 2, 77	**	Released Sept. 5, 80
Annual Update of Literature Associated with Toxicological and Environmental Issues of Phthalic Acid Esters (PE 4.0-LS-SRC)	Syracuse Research Corporation	Oct. 17, 77	12,795	Released Feb. 29, 80
Selected Critical Reviews of Human Health Effects Associated with Phthalate Esters (PE 5.0-CR-SRC)	Syracuse Research Corporation Dr. Philip Howard	Jan. 15, 81	20,488	In progress
Comprehensive Review of Environmental Monitoring Data on Phthalate Esters (PE 6.0-CR-SRC)	Syracuse Research Corporation Dr. Philip Howard	Jan. 15, 81	9,975	Completed. Release pending
Critical Review of the Acute Toxicity of Phthalic Acid Esters to Aquatic Organisms (PE 7.0-CR-SRC)	Syracuse Research Corporation Dr. R. Sugatt	Jan. 15, 81	13,052	Completed. Release pending

*\$45,102 total for three PE 2.0 theses
 **\$38,200 total for two PE 3.0 theses

CMA 054991

PHthalate Esters

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
(PE 8.0-CR-SRC)	Syracuse Research Corporation			Void
Initial Work Plan-CMA Phthalate Ester Program-Analytical Chemistry (PE-9.0-AV-EG&G)	EG&G Mason		\$6,904	Unexecuted
Analysis and Method Validation Of Phthalate Esters (PE-10.0-AV-SRC)	Syracuse Research Corporation		5,500	Unexecuted
Measurement of Water Solubility (PE-11.0-WS-SRC)	Syracuse Research Corporation		24,200	Unexecuted

B.51

CMA 054992

9-25-81

D-16

POLYCHLORINATED BIPHENYLS

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
PCB Survey Data Analysis	Regulatory Research Service	2/27/81	\$87,634	
Analytical Task Orders (PCB-2.0)	Heiden, Pittaway Assoc.	8/13/81	\$12,800	

B.52

CMA 054993

D-17

9-25-81

RUBBER ADDITIVES

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
AMES Salmonella/Microsome Plate Assay (RA 1.0)	Litton Bionetics	1/5/81	\$30,725*	In Progress
L5178Y TK+/- Mouse Lymphoma Forward Mutation Assay (RA 1.0)	Litton Bionetics	1/5/81	*	
In Vitro Transformation of BALB/3T3 Cells (RA 1.0-MBS-In Vitro-LB)	Litton Bionetics	1/5/81	*	
DNA Repair Test (RA 1.0-MBS-In Vitro-LB)	Litton Bionetics	Amendment	*	

*\$29,525 total for three RA 1.0 Studies

1. \$20,225 contributed by sponsoring companies
2. \$9,300 contributed solely by American Cyanamid
3. Amount amended by Panel 4/30/81.

0
1
2

CMA 054994

9-25-81

D-18

STYRENE

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
Two-Year Chronic Inhalation Toxicity and Carcinogenicity Study on Monomeric Styrene in Rats (STY 1.1)	The Dow Chemical Company	Nov. 7, 75	\$397,280*	Released March 30, 79
Results of a Toxicity Study of Monomeric Styrene Administered to Beagle Dogs by Oral Intubation for 19 Months (STY 1.2)	The Dow Chemical Company	Nov. 7, 75	*	Released March 10, 80
Teratologic Evaluation of Inhaled Styrene Monomer in Rats and Rabbits (STY 1.3)	The Dow Chemical Company	Nov. 7, 75	*	Released May 1, 78
Teratologic Evaluation of Styrene Monomer Administered to Rats by Gavage (STY 1.4)	The Dow Chemical Company	Nov. 7, 75	*	Released Sept. 5, 80
D 54 The Fate of Styrene in Rats following an Inhalation Exposure to ¹⁴ C Styrene (STY 1.5)	The Dow Chemical Company	Nov. 7, 75	*	Released April 20, 77
The Fate of Orally Administered Styrene in Rats (STY 1.6)	The Dow Chemical Company	Nov. 7, 75	*	Released April 20, 77
Styrene Incorporated in Drinking Water of Rats for Two Years in Conjunction with a 3 Generation Reproduction Study (STY 2.0)	Litton Bionetics, Inc.	Dec. 16, 75	226,938	Released June 23, 1981
The Pharmacokinetic Profile of Inhaled Styrene in Mice (STY 3.0)	Dow Chemical U.S.A.	June 13, 80	76,000	In Progress
Audit of the Styrene Drinking Water Study (STY 4.0-AUD-LB-West)	Bob West Assoc., Inc.	Oct. 6, 80	8,000	Completed.

CMA 054995

*\$397,280 total for six STY 1. Studies

D-19

TITANIUM DIOXIDE

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
Proposal for a Feasibility Analysis for an Epidemiological Study of Titanium Dioxide Workers (TD 1.0-EPI-TOMA)	Tabershaw Occupational Medical Associates, P.A. .	April 18, 78	\$16,725	Completed Jan. 8, 79
Feasibility Analysis for an Epidemiological Study of Titanium Dioxide Workers, (TD 2.0-EPI-SRI)	SRI International	July 23, 80	14,000	Final report accepted by Panel Sept. 10. 1981

B.55

CMA 054996

9-25-81

D-20

TRICHLOROETHYLENE

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
A Study on the Effects from Repeated Inhalation of TCE Vapor in Mice (TCE 1.0)	Industrial Bio-Test Labs, Inc.	Dec. 1, 75	\$387,911	Terminated
Audit of Industrial BIO-TEST Laboratories, Inc. (TCE 1.5)	Experimental Pathology Labs., Inc.	March 8, 78	11,595	Released Jan. 79
Audit Findings of MCA Administered TCE Chronic Inhalation Study of Industrial BIO-TEST Laboratories, Inc.	MCA Audit Task Group	None	None	Released June 13, 1981
The Pharmacokinetics and Macromolecular Interactions of Trichloroethylene in Mice and Rats as Related to Oncogenicity (TCE 2.0)	Dow Chemical U.S.A.	August 25, 80	91,000	Released June 13, 1981

B.56

CMA 054997

9-25-81

D-21

VINYL CHLORIDE

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
Epidemiological Study of VC Workers (VC 1.4)	Tabershaw-Cooper. Assoc.	April 25, 75	\$42,500	Released Feb. 23, 78
Chronic Vapor Inhalation Study with Vinyl Chloride (VC 2.1)	Industrial BIO-TEST Labs., Inc.	Feb. 8, 73	188,450	Terminated
VC Pathology Report (VC 2.4)	Experimental Pathology Labs	Feb. 2, 78	3,687	Released May 30, 80
Pathology Report on the Brains from Mice, Hamsters, and Rats Exposed to VC in IBT Study (VC 8.0A)	Experimental Pathology Labs	April 15, 80	16,460	Released May 30, 80
Validation of Strip Charts at IBT (VC 8.0B)	Bob West Assoc.	April 8, 80	4,000	Released May 30, 80
B.57 Summary of the Studies Conducted on the Pharmac kinetics/Metabolism of VC in Rats (VC 3.1)	The Dow Chemical Company	Nov. 2, 76	115,000	Released Sept. 2, 77
Effects of Maternally Inhaled Vinyl Chloride on Embryonal & Fetal Development in Mice, Rats and Rabbits (VC 3.2)	The Dow Chemical Company	Aug. 19, 74	224,090	Released Sept. 5, 80
Research Techniques and Methods for Detection and Prevention of Carcinogenesis in Industrial Workers (Yr. 1) (VC 6.4)	University of Louisville	Dec. 12, 76	191,771	Released May 22, 80
Research Techniques and Methods for Detection and Prevention of Carcinogenesis in Industrial Health Workers (Yr. 2) (VC 6.5)	University of Louisville	Feb. 27, 78	252,820	Released May 22, 80
Research Techniques and Methods for Detection and Prevention of Carcinogenesis in Industrial Workers (VC 6.7)	University of Louisville	March 23, 79	287,784	In Progress

9-25-81

CMA 054998

D-22

VINYLLIDENE CHLORIDE

Report Title and Contract Number	Contractor	Contract Execution Date	Present Level of Funding	Comments
A 90-day Study Incorporating VDC in the Drinking Water of Rats (1.6)	Dow Chemical Company	April 1, 75	\$569,590*	Released Dec. 19, 75
A Two-year Toxicity and Oncogenicity Study with VDC Incorporated in the Drinking Water of Rats (1.1)	Dow Chemical Company	April 1, 75	*	Released Sept. 8, 78
A Multiple Generation Reproduction Study in Rats Maintained on Drinking Water Containing VDC (1.1)	Dow Chemical Company	April 1, 75	*	Released July 16, 80
Results of a 97-day Toxicity Study in Male and Female Beagle Dogs Orally Administered VDC in Peanut Oil Via Gelatin Capsules (VDC 1.2)	Dow Chemical Company	April 1, 75	*	Released Sept. 5, 80
90-day Repeated Inhalation Toxicity Study of Vinylidene Chloride (VDC 1.3)	Dow Chemical Company	April 1, 75	*	Released Jan. 21, 77
2-yr Vapor Inhalation Studies on VDC in Rats (VDC 1.3)	Dow Chemical Company			Draft final report dated June, 15, 1981
The Effects of Maternally Inhaled or Ingested VDC on Rat and Rabbit Embryonal and Fetal Development (VDC 1.4)	Dow Chemical Company	April 1, 75	*	Released Feb. 8, 78
The Pharmacokinetics of ¹⁴ C in Rats following Inhalation Exposure (VDC 1.5)	Dow Chemical Company	April 1, 75	*	Released Jan. 21, 77
Metabolism and Pharmacokinetics Profile of VDC in Rats Following Oral Administration (VDC 1.5)	Dow Chemical Company	April 1, 75	*	Released Jan. 21, 77
A Supplement to Reproduction Study with VDC in Sprague Dawley Rats (VDC 2.1)	Dow Chemical Company	Feb. 28, 77	24,000	Contained in final report 1.1 (multiple generation)
Supplementary Studies to Further Evaluate the Observation of Wavy Ribs Among the Offspring of Rats Exposed to VDC (VDC 2.2)	Dow Chemical Company	Feb. 28, 77	33,750	Contained in final report 1.4
Effects of Vinylidene Chloride on DNA Synthesis and DNA Repair in the Rat and Mouse: A Comparative Study with Dimethylnitrosamine (VDC 3.0)	Dow Chemical Company	Jan. 12, 79	81,000	Released April 25, 79
A Comparison of Four Mouse Strains Exposed to Subchronically Inhaled VDC (VDC 4.0)	Dow Chemical U.S.A.	Jan. 12, 79	21,142	Released April 25, 79
*\$569,590 total for nine VDC 1. Studies				9-25-81

CMA 054999

D-23

B-58

ZINC DIALKYL DITHIOPHOSPHATES

<u>Report Title and Contract Number</u>	<u>Contractor</u>	<u>Contract Execution Date</u>	<u>Present Level of Funding</u>	<u>Comments</u>
Dermal Irritation Screen in Rats; Dermal Irritation Screen in Rabbits, A 21-Day Dermal Toxicity Study in Rats with Four Test Materials, A 21-Day Dermal Toxicity Study in Rabbits with Four Test Materials (ZDOP 1.0)	Bio/dynamics, Inc.	April 22, 81	\$79,857	In progress

B.59

CMA 055000

D-24

9-25-81

PROJECT SUMMARY
Part I, Active Projects
September 9, 1981

A Proposal No. Task Force TF Subdivision Monitor	B Investigator Organization Cost Time Span	C Proposal Subject	D Dates: 1. FPP Approval 2. Contract Execution 3. Last Written Report Comments:
75-11 Pt. II AMTF AM Magid	R. W. Micholls York University \$31,788 1 Year	Experimental and Theoretical Studies on the Spectrum of ClO with Stratospheric Applications.	1. 7/21/76 2. 8/18/76 3. 1/4/80 (71-AW) Cancellation in progress.
76-101 Pt. III AMTF SM Florio	D. G. Murcay U. of Denver \$150,000	Balloon Measurement Program	1. 11/11/76 2. 2/2/77 3. 7/20/81 (72-U)
77-156 AMTF SM Strobach	H. L. Buljs Bomem, Inc. \$81,050 + \$19,000 1 Year	Operational Costing for Flights Planned in 1977.	1. 1/18/77 2. 6/9/77 & 4/14/81 3. 12/5/80 (67-AC) 8/31/81 73-AB
77-166 AMTF SM McCrillis	D. G. Murcay U. of Denver \$77,500	Proposal to Perform a Balloon Flight Simultaneously from Palestine, Texas with Dr. Anderson.	1. 6/24/77 2. 2/8/78 3. 6/16/81 (71-AX)
77-222 AMTF AM McCrillis	Howard-Birks NOAA/U. of Co. \$40,000 1 Year	A Proposal for the Development of Technique of Measuring the Total Chlorine Content of Air.	1. 1/18/78 2. 3/27/78 3. 12/22/80 (65-BY) Awaiting final report.
77-232 AMTF SM Florio	R. Zander U. of Leige \$42,025 1 Year	Continuation of 76-141 Supplement.	1. 4/27/78 2. 6/28/78 3. 7/27/81 (72-AC)
78-257 MTF Orfeo	G. S. Watson Princeton U. \$52,638 1st Year \$54,652 2nd Year	Statistical Investigations of the CFM Problem.	1. 4/4-6/79 2. 8/2/79 3. 3/31/81 (71-AN, AO and AZ)
78-258 CTF Magid	R. B. Timmons U. of Texas/Arl. \$36,368 + \$800 To 8/31/81	Absorption Measures of HOCl and Related Molecules.	1. 12/13/78 2. 1/12/79, 7/10/79, 2/11/80 3. 3/19/81 (69-AA) 7/30/81 72-AP Monitor Rep

B.60

CMA 055001

For Distribution by CMA
SPECIAL PROGRAMS DIVISION

Ref. No. APP-75-221

Date 9/9/81

Appendix E

A	B	C	D
80-300 CTF Steed	R. J. Saykally U. of California \$24,597 2 Years	Near-IR and Far-IR Spectroscopy.	1. 6/26-27/80 2. 2/17/81 3. 3/26/81 (70-Q)
80-304 MTF Orfeo	Reinsel-Tiao U. of Wisconsin \$105,000 15 Months	Statistical Analysis of Worldwide Stratospheric Ozone Data for the Detection of Trend.	1. 6/26-27/80 2. 10/13/80 3. 5/29/81 (71-L & M)
80-307 CTF Magid	M. J. Kurylo NBS \$60,000 1 Year	Reactions Within the NO _x Cycle.	1. 6/26-27/80 2. 1/8/81 3. 7/30/81 72-AP Monitor Report
80-311 MTF Orfeo	M. D. Sze AER, Inc. \$248,862 1 Year	Continuing Research on Atmospheric Chemistry, Radiation and Dynamics.	1. 8/26-27/80 2. 8/11/80 3. 4/81 (70-U)
80-315 AMTF AM Strobach	J. A. Coxon Dalhousie U. \$37,450 1 Year	The A ² ₁ - X ² ₁ Band System of ClO: Absolute Absorption Cross-Section at High Resolutions for Bands of Stratospheric Interest (extension of 78-255).	1. 8/26-27/80 2. 10/23/80 3. 5/22/81 (71-F)
80-316 AMTF AM Magid	Solomon-deZafra SUNY/Stony Brook \$186,478 + \$3,000 1 Year	Extension of MM-Wave Observations of Chlorofluoromethane Byproducts in the Stratosphere.	1. 6/26-27/80 2. 10/23/80 3. 7/12/81 (72-J) 7/30/81 72-AP Monitor Rept
80-317 MTF Sobolev	M. J. Bailey Maryland U. \$10,700	Uncertainties and Benefit-Cost Analysis of CFC Control.	1. 6/26-27/80 2. 8/7/80 3. 72-AW Final Report 3/23/81 (69-AP)
80-318 AMTF ALE Steed	Traub/Chance Smithsonian \$54,121 1 Year	Far-Infrared Laboratory Spectroscopy of Halogen-Containing Molecules.	1. 8/26-27/80 2. 10/31/80 3. 8/17/81 (73-0)
80-320 MTF Martens	G. Brasseur I. d'Aeronomie \$39,000 1 Year	Modeling of the CFC Effect on the Ozone Layer.	1. 8/26-27/80 2. 11/14/80 3. 8/12/81 (73-F)
80-321 Pt. III CTF McCrillis	Birks U. of Colorado \$30,000 1 Year	Studies of Reactions of Importance in the Stratosphere.	1. 8/26-27/80 2. 10/21/80 3. 7/27/81 (72-AA)

B.61

CMA 055002

A	B	C	D
78-265 AMTF AM McCrillis	D. G. Murcay U. of Denver \$35,000 1 Year	Laboratory Studies to Determine Infrared Spectra for Several Molecules and to Examine Infrared Solar Spectra to Obtain Information on Constituents of the Earth's Atmosphere.	1. 6/28/79 2. 8/23/79 3. 9/8/81 (73-AL) Final Report
79-268 CTF Sobolev	A. W. Castleman \$5,000	Consulting.	1. 12/13-14/78 2. 1/26/79 3. 7/21/80 (64-AH)
79-282 AMTF SM Diprose	J. E. Beckman Queen Mary College \$5,250 1 Year	Determination of the Rotational Emission Due to ClO Using a Cooled Superheterodyne Receiver.	1. 10/19/79 2. 6/24/80 & 9/8/80 3. 6/29/81 (71-CC)
79-286S CTF Strobach	R. J. Donovan U. of Edinburgh \$20,000 + \$4,741 1 Year	Reaction of ClO with OH: A Potential Sink for ClO _x .	1. 10/17/79 & 6/1/81 2. 2/20/80 3. 2/19/81 (69-D)
79-289 CTF Orfeo	C. J. Howard NOAA \$121,500 1 Year	Kinetic Studies of Stratospheric Chlorine Chemistry.	1. 1/23-24/80 2. 4/20/80 3. 8/14/81 Project Report 73G
79-290 AMTF ALE Nouyrigat	P. Jouve U. of Reims \$45,515 1 Year	Measurement of the Vertical Distribution of HCl, O ₃ , HCHO. Measurement of the Ratio of HF/HCl Concentrations.	1. 6/26-27/80 2. 9/18/80 3. 8/14/81 (73-G)
80-294 CTF Steed	R. T. Watson \$10,000 1 Year	Consulting.	1. 2/8/80 2. 5/23/80 3. 2/18/81 (68-AE)
80-295 CTF Steed	A.R. Ravishankara Georgia Tech \$43,007 1 Year	A Study of the Reaction of OH with ClO.	1. 4/17/80 2. 5/23/80 3. 6/1/81 (71-0)
80-297 AMTF ALE Florio	A. Bonetti U. de Firenze \$10,000 1 Year	Project SIBEX - Extension.	1. 8/26-27/80 2. 7/24/81 3. 7/30/81 72-AM Monitor Report
80-299 AMTF AM	C. J. Howard NOAA \$70,000	Infrared Spectroscopy of Atmospheric Species.	1. 10/8-10/80 2. Panel commitment to co-fund expired. 3. co-funding. See 73-AA 8/25/81

B.62

CMA 055003

E-3

A	B	C	D
80-322 AMTF McCrillis Nouyrigat	Goldman-Barbe U. of Denver/Reims \$13,405 1 Year	Collaborative Studies on Atmospheric Spectroscopy.	1. 8/12/80 2. 7/30/81
80-323 AMTF ALE Lane	Cunnold/Alyea/Prinn CAP Associates \$147,000 1 Year	Data Coordination and Analysis for the CMA Atmospheric Lifetime Experiment and Meteorological and Multi-Dimensional Modeling Considerations Related to Atmospheric Effects of CFCs.	1. 8/27/80 2. 11/18/80 3. 9/3/81 (73-AJ)
80-324 AMTF ALE Lane	P. G. Simmonds \$102,635 1 Year	Monitoring Station - Adrigole, Ireland.	1. 8/27/80 2. 11/12/80 3. 8/21/81 (73-S) 9/3/81 (73-AJ and AK)
80-325 AMTF ALE Lane	R. A. Rasmussen Oregon Grad Center \$160,863 + \$8,210 + \$11,300 1 Year	Atmospheric Lifetimes Experiment - Tropospheric Halocarbons.	1. 8/27/80 2. 11/10/80 3. 5/27/81 (71-K & 71-AR) 9/3/81 (73-AJ)
80-328 AMTF AM McCrillis/Diprose	Murcray/Roscoe U. of Denver \$7,500 1 Year	An Intercomparison of Measurements of Stratospheric HCl.	1. 11/19/80 2. Awaiting flight plan and AMTF approval. 3. 12/18/80 (67-AF)
80-329 CTF McCrillis	Birks-Sievers U. of Colorado \$45,000 1 Year	Kinetic Studies of Reactions of OH and HO by Negative Chemical Ionization Mass Spectrometry.	1. 9/23/80 2. 1/13/81 3. 7/27/81 (72-AA)
80-330 AMTF Lane/Cadorin	F. Bruner U. di Urbino \$75,000 1 Year	Atmospheric Monitoring of F-21 as a Possible Tropospheric Sink for F-11.	1. 2/18-19/81 2. 8/7/81 3. 7/30/81 72-AL Monitor Rep
80-333 AMTF AM Florio	J. H. Shaw \$10,000	Atmospheric Spectra Consultant.	1. 1/12-13/81 2. 1/22/81 3. 6/17/81 (71-BC)
81-334 CTF Diprose	Burrows/Cox AERE Harwell \$45,500 1 Year	Investigation of some Halogen Intermediates of Importance to Stratospheric Ozone Using an Infrared Laser Molecular Modulation Spectrometer.	1. 4/8-10/1981 2. Awaiting executed Agmt.
81-339 AMTF AM Magid	L. E. Snyder \$5,000	Consultant.	1. 2/18-19/81 2. 3/10/81 3. 9/2/81 (73-AG)

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E-4

A	B	C	D
81-345 CTF Block	D. Herschbach \$10,000	Consulting.	1. 4/8-10/81 2. 5/28/81
81-348 AMTF ALE Lane	J. E. Lovelock \$7,500	Consulting.	1. 5/13-14/81 2. 6/17/81
81-350 AMTF SM	Lovas-Suenram NBS \$24,900 1 Year	Millimeterwave Measurements and Spectral Predictions of Stratospherically Important Species.	1. 6/24-25/81 2. Awaiting executed Agree- ment mailed 7/27/81.
81-353 AMTF AM Florio	J. G. Anderson \$5,000	Consulting.	1. 4/8-10/81 2. 5/28/81
81-354 AMTF SM Florio	D. G. Murcray \$5,000	Consulting.	1. 4/8-10/81 2. 5/28/81
81-356 AMTF SM	R. A. Rasmussen \$18,000	Joint Calibration Study of F-21 with Dr. Bruner (see 81-365).	1. 6/24-25/81 2. 9/1/81
81-360 MTF Orfeo	G. S. Watson Princeton U. \$78,000 1 Year	Statistical Analysis of Atmospheric Data	1. 8/5-6/81 Agreement in process.
81-361 AMTF ALE Lane	F. Alvea CAP Inc. \$95,000 + \$19,850	Fluorocarbons, Chlorocarbons and Nitrous Oxide: Continuous Measurements at 5 Global Sites. (Part IV only) (See 81-370)	1. 8/5-6/81 Agreement in process.
81-362 AMTF Magid	deZafra-Solomon SUNY-Stony Brook \$143,241 + \$15,000 1 Year	Extension of MM-Wave Observation of Chloro- fluoromethane Byproducts in the Stratosphere.	1. 8/5-6/81 Agreement in process.
81-364 AMTF McCrillis	D. G. Murcray U. of Denver \$35,322 1 Year	Continuation of 78-265	1. 8/5-6/81 Agreement in process.
81-365 AMTF SM	F. Bruner \$3,000	Joint Calibration Study of F-21 with Dr. Rasmussen (see 81-356).	1. 6/24-25/81 2. Agreement in process.

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CMA 055005

B-5

A	B	C	D
Proposal Number Task Force TF Subdivision	Investigator Organization Cost Time Span	Proposal Subject	Dates: 1. Received by CMA 2. Distributed to FPP Comments:
81-366 MTF Orfeo	M. D. Sze AER, Inc. \$262,442 1 Year	Continuation Research on Atmospheric Chemistry Radiation and Dynamics	1. 8/5/-6/81 2. Agreement in process.
81-369 AMTF SM Steed	W. Klemperer \$10,000	Consulting.	1. 6/25-26/81 2. Agreement in process.
81-370 AMTF ALE	P. Simmonds \$95,324	Fluorocarbons, Chlorocarbons and Nitrous Oxide: Continuous Measurements at 5 Global Sites. (Task II Only) (See 81-361).	1. 8/5-6/81 Agreement in process.

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CMA 055006

PROJECT SUMMARY
Part II, Proposals for Review

A Proposal Number Task Force TF Subdivision	B Investigator Organization Cost Time Span	C Proposal Subject	D Dates: 1. Received by CMA 2. Distributed to FPP Comments:
80-331 CTF	Zellner U. Göttingen \$15-20,000	Equilibrium Constant for the Possible Complex Formation $\text{ClO} + \text{O} \rightleftharpoons \text{OClOO}$.	1. 10/6/80 2. 7/27/81 (72-AB)
81-342 CTF	L. F. Phillips U. of Canterbury \$5,000 1 Year	Measurement of O Atom Yield from HOCl Photolysis at 308 nm.	1. 3/19/81 2. 3/31/81 (69-AF) Awaiting proposal clarification.
81-350 AMTF SM	R. D. Suenram F. J. Lovas/NBS \$99,000 2 Years	Millimeterwave Measurements and Spectral Predictions of Stratospherically Important Species.	1. 4/13/81 2. 4/15/81 (70-D)
81-355 AMTF	Zahniser/Kolb Aerodyne-Research \$38,517 (Co-funding) 1 Year	Measurement of Quantitative Infrared Line Strength Parameters for the Hydroperoxyl Radical.	1. 5/26/81 2. 5/26/81 (71-D) Awaiting NASA peer review.
81-358 CTF	Birks-Sievers U. of Colorado \$40,000 1 Year	Studies of Reactions of Importance in the Stratosphere	1. 6/8/81 2. 6/15/81 (71-AB)
81-359P	A. J. Rutgers	Theoretical Calculations	1. 6/15/81 Awaiting information from Dr. Klais.
81-363 AMTF	Komhyr-Grass NOAA \$334,000 2 Years	Umkehr Observations with Automatic Dobson Ozone Spectrophotometers	1. 7/6/81 2. 7/8/81 (72-C) 8/17/81 (73-M) Bojkov
81-367 AMTF	R. H. Gammon U. of Washington	The Ocean Sink for CFMs: A Quantitative Assessment for F-11 and 12.	1. 7/14/81 2. 7/15/81 (72-L)
81-368 CTF	Ravishankara Georgia Tech \$62,389 1 Year	Lab Studies of Stratospheric Reactions	1. 7/17/81 2. 7/19/81 (72-Q)
81-371	Dutsch-Kunzi U. of Zurich \$16,000	Umkehr & Microwave Measurements for the Determination of Ozone Profiles	1. 8/5/81 2. 8/10/81 (72-AZ) 9/2/81 (73-AF) Snyder

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CMA 055007

E-7

A	B	C	D
Proposal Number	Investigator	Proposal Subject	Dates:
Task Force	Organization		1. Received by CMA
TF Subdivision	Cost		2. Distributed to FPP
	Time Span		Comments:
B1-372	Lee-Golden	Reaction Rate Constants of HO ₂ with NO and	1. 8/3/81
CTF	SRI International	NO ₂ .	2. 72-AV
	\$60,000		
	1 Year		

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CMA 055008

BIOGRAPHIC SKETCHES

DIRECTORHasmukh C. Shah, Ph.D.

Dr. Shah received his Ph.D. in Pharmacology and Toxicology from the University of Rhode Island in 1973. Dr. Shah joined CMA in 1979 as the Director of Special Programs and is responsible for the administration of voluntarily-funded research and advocacy programs. Dr. Shah is also the Staff Executive on the Special Programs Advisory Committee which is a multidisciplinary group of member company executives. Before joining CMA, Dr. Shah was the Director of the Toxicology and Biomedical Sciences Department at Equitable Environmental Health. He was also the Project Director for the National Institute for Occupational Safety and Health's criteria document project. In addition, Dr. Shah served as the Project Director for the Profiles on Occupational Hazards for Criteria Document Priorities completed by EEH for NIOSH. This project involved compiling information based on physical and chemical properties, uses, manufacturing processes, economic trends, biologic effects of exposure on humans and animals, and current standards. Previously, at the Stanford Research Institute, Dr. Shah served as Project Coordinator for the Cancer Control Monograph on Diethylstilbestrol prepared for the National Cancer Institute and worked as a Senior Toxicologist on Criteria document projects for NIOSH. Dr. Shah was a Visiting Fellow Scientist at the National Institute of Environmental Health Sciences and was involved in reproductive and toxicologic studies related to diethylstilbestrol. His graduate research involved inhalation toxicity of industrial organic solvents, drug interactions, and drug metabolism.

PROGRAM ADMINISTRATORSRobert J. Fensterheim, M.P.H.

Mr. Fensterheim joined the CMA Special Programs staff on June 5, 1981. His responsibilities at CMA include the allyl chloride, arsenic, epoxy resins, ethylene dichloride, polychlorinated biphenyls and rubber additives programs. Mr. Fensterheim has a masters degree in Public Health from Yale University. His Masters Thesis was on "An Assessment of the Contribution of Environmental Factors to Cancer of the Colon with Special Emphasis upon the Role of Industrial Exposure." Bob is currently pursuing a Masters Degree in Business Administration at George Washington University with special emphasis on administration of science and technology.

Prior to joining CMA, Mr. Fensterheim was a research associate at the Congressional Office of Technology Assessment (OTA) where he was responsible for writing a report for Congress which examined technologies for determining cancer risk from the environment.

Bob was also a consultant at Clement Associates, Inc., where he worked extensively on projects for the Toxic Substances Control Act Interagency Testing Committee. At Clement he was a Team Leader on a project to evaluate

priority-setting systems to monitor environmental contaminants likely to enter food.

Elizabeth J. Moran, Ph.D., D.A.B.T.

Dr. Moran joined the Special Programs staff on April 27, 1981. She is responsible for the butylated hydroxytoluene, glycol ethers, ketones, and phthalate esters programs.

Dr. Moran is a board-certified toxicologist and biochemist. As program manager at JRB Associates, she supervised senior scientists in the preparation of toxicological hazard assessment documents for EPA. As a Senior Scientist at JRB, she provided support to EPA in toxicology and structure-activity relationships for both initial and in-depth review of PMN chemicals under Section 5 of TSCA. Dr. Moran also spent three years directing the Flavor Safety Program at International Flavors and Fragrances. Her experience included development of regulatory positions and safety evaluation criteria as well as development of protocols for safety testing of new chemicals, submission to regulatory agencies, development of new test methods in neuropharmacology and basic research in sensitization and structure-activity relationships.

Joseph T. Seawell

Mr. Seawell joined CMA in 1975 as a program administrator and is responsible for management of research programs on acrylonitrile, phosgene, titanium dioxide, trichloroethylene and vinylidene chloride. Mr. Seawell received his B.S. degree in Chemistry from Clemson University. His doctoral work at the University of Pittsburgh was interrupted by a call to active duty in World War II. Before joining CMA, Mr. Seawell was Assistant to the Vice President of the Technological Division at CPC International. His responsibilities included coordination of corporate toxicological testing programs concerned with foods, food additives, food packaging materials, the Federal Hazardous Substances Labeling Act, and CPC's Animal Nutrition Laboratory. Mr. Seawell was on loan for four years to CPC's International Division, where he planned and conducted development programs in Argentina and Colombia, South America. Prior to joining CPC International Mr. Seawell served as Senior Research Fellow and Administrative Fellow at the Mellon Institute of Industrial Research. Mr. Seawell directed a multiple Fellowship at Mellon for twelve years.

Carol R. Stack, Ph.D.

Dr. Stack received her Ph.D. in Biology from New York University in 1969. She joined CMA in 1980 as a program administrator and is responsible for management of research and advocacy programs involving benzene, chlorobenzenes, styrene, vinyl chloride, and zinc dialkyl dithiophosphates. Before joining CMA, Dr. Stack was a Biologist in the Toxicology and Biomedical Sciences Department at Equitable Environmental Health where she served as an Assistant Project Director responsible for the preparation of NIOSH multi-chemical criteria documents on primary aliphatic monoamines and brominated aliphatics. In 1972, she served as Visiting Scientist at the Neurological Institute of Colombia, Bogota, where she investigated central auditory pathways in echolocating birds. Her

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graduate research centered on histological and histochemical studies on internal auditory systems.

John C. Van Horn

Mr. Van Horn earned his B.S.Ch.E. and M.S.E. degrees from Purdue University. Mr. Van Horn joined CMA in 1975 as Program Administrator for the Fluorocarbon Research Program. In subsequent years Mr. Van Horn also has been responsible for the activities of the Distribution and Engineering Advisory Committees, CHEMTREC and various special programs. For six years prior to joining CMA, Mr. Van Horn consulted with CMA members and others in new product development and divestitures. Previous activities were concentrated in management and new product development. At Ventron Corporation, Mr. Van Horn was President of the Chemicals Division which grew substantially from both internal growth and by acquisitions over a three year period. With The Dow Chemical Company for 20 years, he headed new product development for chemicals and participated in establishing a chemicals profit center. He also spent several years in South America as President, Dow Quimica, Argentina, S.A.

PROGRAM COORDINATOR

Debra J. Boltas

Ms. Boltas received her B.S. degree in Psychology from the University of Maryland in 1975. She joined CMA in 1975 as a secretary in the Government Relations Department where she worked first in industrial relations and then in the environmental area. In her present position as Coordinator of Special Programs she reports to the Director of Special Programs and is responsible for overseeing the preparation of research agreements and financial statements, coordination of support staff, and writing and editing of in-house reports. Ms. Boltas is also the Secretary to ASTM Committee E-15 on Industrial Chemicals.

CMA 055011

C

CMA 055012

Presentation to Review Committee
of the Board of Directors

CHEMTREC
1981

CMA 055013

CHEMTREC

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1. SUMMARY OF ACTIVITIES

CHEMTREC was approved by the Board of Directors in 1970 and became operational on September 5, 1971. By September 30, 1981, CHEMTREC had received more than 148,000 phone calls and handled about 21,200 incidents. The original charter called for a two-step program:

1. Upon receipt of a phone call identifying the chemical involved, the communicator provides information on the chemical from file cards prepared in advance, from Material Safety Data Sheets, or other approved resource material.
2. The communicator then calls the shipper, or other source of expertise, for telephone and/or on-site assistance in resolving the problem.

This operating concept was reaffirmed by the CHEMTREC Review Group in 1978. We anticipate no major changes in the basic design of the program but we do foresee an evolutionary growth in the operation's activities, particularly with regard to environmental information.

In 1978 the Bell Telephone System reviewed the communications aspects of the operation. They made recommendations for "hard copy" transmission to participating companies, for a teleconferencing bridge to expedite verbal information flow, for a computer to expedite receipt of information from railroads and to computerize the data base.

- The "hard copy" equipment is in place and is currently in operation with eighteen companies, two agencies and twenty four stations. We expect this to be expanded.
- The telephone conferencing bridge is in place and has been operating since September 1, 1981.
- Computer linkage with the railroads and computerization of the data base are still under study.

The CHEMTREC data bank is the heart of our internal operation. With the advent of the OSHA type Material Safety Data Sheets the process by which chemical companies submit information to CHEMTREC on their chemical and trade name materials has been simplified. As a result of this, we have received an overwhelming number of these data sheets in the past year.

Last year a filing consultant completely reorganized and filed approximately 35,000 trade name sheets and another 7,500 chemical sheets. The maintenance and upgrading of these files is an ongoing program. In upgrading our files, we have concentrated our initial efforts on the top 120 regulated chemicals transported by rail. These chemical file cards have been completed.

With the move to the new quarters, CHEMTREC expanded its physical facilities appreciably. They were very cramped in the old building. The operating consoles for the communicators are much more efficient than the old desks and we're very proud of our new facility. The viewing windows in the outer hall allow observers to see the operation without interfering with the communicators' activities.

A feasibility study was made of the computerization of CHEMTREC address files, chemical files, portions of the trade name files and a certain amount of tank car information. The consultant recommended that we use the IBM 34 currently in CMA. He is currently evaluating our ability to connect this computer with existing terminals we now use to transmit "hard copy" reports.

We continue to encourage non-member companies to participate in the program. At the present time, over 690 non-member companies have supplied information on their products and have listed their emergency numbers with CHEMTREC. However, about 75% of the total transportation incidents that CHEMTREC handles involve CMA member companies.

The fourteen workshops presented by the Advisors have been of considerable value in improving the emergency response capability of participating companies. Over 2800 people attended those workshops. The workload became excessive for the companies doing the training, and one of the goals for the current year was to establish a training program within a major university. On September 9-10 Texas A&M University presented the first of a series of workshops to be held around the country. Held in Houston, the first session was filled to capacity. The workshops are being monitored by the Advisors, and we will continue to work with the University to improve the training program.

2. MISSION

The mission of CHEMTREC is to provide information and assistance to those involved in chemical incidents. This is accomplished by:

- Providing immediate information to the caller following identification of a product involved.
- Communicating with the shipper so that his experts may support the situation with either telephone communication or on-site assistance, as required.

3. STRUCTURE OF CHEMTREC

CHEMTREC is an operating function of CMA management. The internal organization is shown on page C-8.

The Director of CHEMTREC has a group of eight advisors who are active emergency response managers for their respective companies. The Advisors Group is part of the Transportation Safety Task Group of the Distribution Committee. The Advisors Group is identified on page C-12.

The CHEMTREC Project Team is currently inactive and is subject to reconstitution at such a time as it is needed. It also operates under the Transportation Safety Task Group of the Distribution Committee.

4. MAJOR ACCOMPLISHMENTS

Major accomplishments since the last report are:

- Moving to the new quarters without interruption of operations.
- Completing the refiling and organization of the chemical reference materials.

- Activation of the teleconferencing bridge.
- Having a computer feasibility study completed with recommendations for further work.
- The completion of ten years of successful operation of the program.
- Publication of a new booklet describing the functions of CHEMTREC, and developing a new logo for the program.
- A definite increase in receipt of Material Safety Data Sheets from participating companies.
- Several media tours, plus numerous presentations to organizations and participating companies.
- Organized mutual assistance programs for phosphorus and hydrogen fluoride.
- Completed tape/slide unit describing CHEMTREC.
- Began emergency response training program using Texas A&M personnel as instructors.
- Added computer terminal to access government data bases.
- Improved training for communicators.

5. GOALS FOR 1981-82

- Complete computer study of CHEMTREC operations.
- Develop outside source of adequate emergency response training to relieve member companies of their responsibility.
- Budget for basic operations for computer.
- Continue upgrading file information.
- Continue working with Association of American Railroads to improve railroad response time.
- Continue working with the Department of Transportation on upgrading their Emergency Response Guidebook.
- Continue to work with National Liquefied Petroleum Gas Association to establish a mutual assistance program for liquefied petroleum gas.
- Encourage tank truck carriers to place CHEMTREC telephone labels on their equipment.
- Expand communicators' training.
- Increase communicator shift coverage.
- Establish recovery drum program.

6. LONG RANGE PLANS

- Work towards increasing the mutual assistance programs of the industry.
- Improve reporting by carriers, and shorten time factor in such reporting.
- Review and upgrade all chemical files, and provide cards for all DOT regulated materials.
- Develop capability to transmit "hard copy" of chemical files to emergency services.
- Develop computerized file of tank car reporting marks by owner and lessee.
- Expand data sheets filing system.
- Establish inter-industry group to develop consistent emergency response information on specific products.
- Expand mission to provide limited assistance to DOT regulations on labeling and placarding.
- Develop list of clean-up companies by state.
- Develop improved program of cooperation with state agencies.

7. PROBLEMS AND PROPOSED RESOLUTIONS

- Getting full participation from companies in providing adequate product information.
 - This requires constant communication with their representatives, and possibly more executive contact interest.
- Additional staffing on communication consoles for increased load and vacations.
 - Initially add communicator on evening shift on business days.
- Expedite file updating.
 - Adequate consulting services.
 - Available time use of additional communicator.

8. TRAINING OF STAFF

Training for communicators consists of visits to local fire training academies, participating in CHEMTREC workshops and in-plant visits to selected chemical plants. Also, we plan visits to Baltimore harbor, and tours with Bureau of Explosives' inspectors. There is an ongoing need for them to become more aware of the activities of the chemical industry.

In the current year we hope to send our secretary to a workshop to give her more awareness of the activities of the program.

The CHEMTREC supervisors will be participating in one or more of the above, with the possibility of specialized supervisory training where indicated.

9. IDENTIFICATION OF ADDITIONAL RESOURCES NEEDED

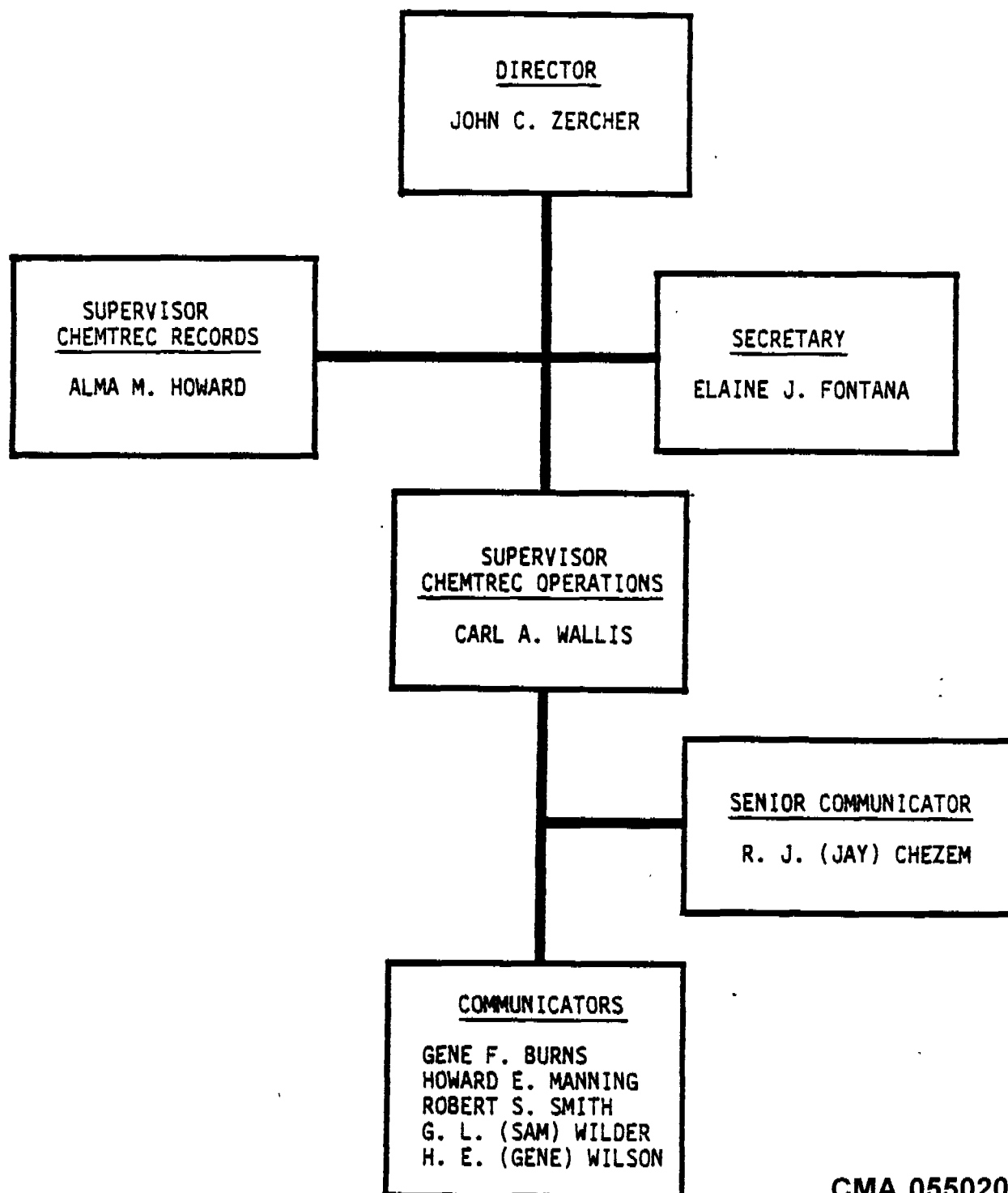
- Space for additional staff.
- Additional communicator.
- Consulting services.

CMA 055019

10. CHEMTREC Staff

CHEMICAL TRANSPORTATION EMERGENCY CENTER

CHEMTREC



CMA 055020

JOHN C. ZERCHER

John C. Zercher is the Director of the Chemical Transportation Emergency Center (CHEMTREC) of the Chemical Manufacturers Association, and has been since its inception.

The Chemical Transportation Emergency Center, which started operations in September 1971, is designed to alert public safety and fire personnel as to the immediate hazards of a given chemical involved in a transportation accident. It has a telephone number which emergency personnel and carriers can call to receive this precautionary information. In addition, the center alerts shippers and manufacturers to the problem so they can provide their expertise and/or assistance.

Background

- Graduated from Texas A&M College, B.S. in Chemical Engineering.
- 5 years U.S. Army, Chemical Warfare Service, World War II - planning and weapons development.
- 25 years Celanese Chemical Company
 - 10 years in production management.
 - 15 years in packaging, distribution planning and safety of chemical products in transportation.
- 15 years participation in Chemical Manufacturers Association's Chemical Packaging and Transportation Equipment Committees, being past chairman of the latter. Also served on Tank Car Committee of Association of American Railroads.

CMA 055021

CARL A. WALLIS

Carl A. Wallis is the Supervisor-Operations, Chemical Transportation Emergency Center (CHEMTREC), Chemical Manufacturers Association.

The Chemical Transportation Emergency Center, which started operations in September 1971, is designed to alert public safety and fire personnel as to the immediate hazards of a given chemical involved in a transportation accident. The Center can be reached through 800 WATS toll-free telephone lines which emergency personnel and carriers use to receive this precautionary information. In addition, the Center alerts shippers and manufacturers to the problem so they can provide their expertise and assistance.

SCHOOLING

1958 and 1959	Two years Business Management University of Maryland
1953 and 1954	Two years Accounting William and Mary, Norfolk

BACKGROUND

1971 - Present	- Chemical Manufacturers Association - CHEMTREC program involving Emergency Response
Twenty Years	- United States Marine Corps
1970 - 1971	- Platoon Leader, Vietnam
1967 - 1970	- Special Assignment, Marine Barracks, 8th & I Washington, D.C.
1965 - 1966	- Platoon Leader, Vietnam
1951 - 1965	- Various assignments throughout the world including Korea in the early 1950's
1979	- Paper published by American Chemical Society titled "Chemical Transportation Emergency Center"

CMA 055022

ALMA M. HOWARD

Alma M. Howard is the Supervisor, Records of the Chemical Transportation Emergency Center (CHEMTREC). Responsible for organizing the Material Safety Data Sheet files and maintaining and upgrading information in the chemical card files.

Background

- Attended the University of Pennsylvania, Prince George's Community College and the University of Maryland.
- 2 years National Geographic Society, Analyst. Processed non-routine payments for subscriptions and publications.
- 4 years Prince George's County Health Department, Division of Environmental Health, Administrative Assistant. Supervised a staff of eight secretaries. Responsible for hiring, performance evaluation, training and work assignments.
- 1 year Basil Corporation, Jeddah, Saudi Arabia, Office Manager for engineering firm.
- 1 year Velsicol Chemical Company, Beirut, Lebanon, Office Manager for Middle East Branch Manager.
- 4 years Secretary, Director of CHEMTREC, CMA.
- 5 years Administrative Assistant, Technical Director, CMA.

CMA 055023

11. CHEMTREC Advisory Groups

CHEMTREC Advisors Group

Members

R. L. Way, Chairman
A. M. Albera
M. M. Anderson
S. H. Brand
T. L. Hamberger
G. M. Jardim
R. J. Mesler, Jr.
W. T. Niggel

Shell Chemical Company
PPG Industries, Inc.
Union Carbide Corporation
Monsanto Company
E. I. du Pont de Nemours & Company, Inc.
Chevron Chemical Company
Dow Chemical Company
Mobay Chemical Corporation

Objective: To monitor the operations of CHEMTREC, to make recommendations for improvement of operations of CHEMTREC and emergency response, and to assist in implementation of these programs.

CHEMTREC Project Team

Currently Inactive

CMA 055024

12. BUDGET

The CHEMTREC budget for the current fiscal year is \$621,500. Based on current expectations, we will end the year fairly close to the budgeted funds.

When the budget was prepared, we did not anticipate having workshops during the current fiscal year. Therefore, no revenue was planned. Our best estimate at this time is that we will have an unbudgeted income of approximately \$16-18,000 at the end of the year.

Next year's budget should be incrementally higher than the current one, with possible increases for computer capability and consulting services.

CMA 055025

CHEMTREC Red Phone Inbound Calls

1 Oct. 1981
Start-up (9/5/71)
to date

	September 1981		Year to Date		1 Oct. 1981	
	Total	%	Total	%	Total	%
Trans. Emergency Calls	498	21	4649	22	39142	27
Other Emergencies	62	3	520	2	5529	4
Non-Emergency Info Calls	1016	43	9259	43	47937	32
Howard Johnson	-	-	11	-	3577	2
Misc. (no answers, etc.)	315	13	3057	14	26513	18
Delivery Problems	398	17	3449	16	20772	14
Disposal Requests	82	3	589	3	4462	3
Total	2371	100	21534	100	147932	100
<u>Call Reports Prepared</u>						
Non-Trans. Emergencies	33	12	271	11	3049	14
Trans. Emergencies	248	88	2202	89	18150	86
Total	281	100	2473	100	21199	100
<u>Transportation Mode T.E.</u>						
Rail	97	39	911	41	7788	43
Highway	90	36	762	35	7453	41
Water	2	1	17	1	271	2
Terminal	51	21	463	21	2259	12
Pier	5	2	28	1	174	1
Airplane	3	1	21	1	205	1
Total	248	100	2202	100	18150	100
<u>Source T.E.</u>						
Police Personnel	26	10	195	9	1353	7
Fire Personnel	14	6	198	9	1972	11
Truck Driver	17	7	95	4	523	3
Operations	178	72	1596	73	13189	73
Govt., State	10	4	97	4	895	5
Other	3	1	21	1	224	1
Total	248	100	2202	100	18150	100
<u>Package Type T.E.</u>						
Tank Truck	15	6	157	7	1601	9
Tank Car	92	37	863	39	6978	38
Drum	83	33	642	29	5395	29
Glass	8	3	95	4	557	3
Metal Pail	11	5	110	5	959	5
Bags	11	5	77	3	766	4
Barge	1	-	10	1	118	1
Cylinder	1	-	37	2	372	2
Other	26	11	219	10	1549	9
Total	248	100	2210	100	18295	100
<u>Class of Product T.E.</u>						
Regulated	199	80	1708	77	12246	75
Non-Regulated	12	5	153	7	1688	11
Unknown	37	15	341	16	2337	14
			(no stats 71, 72 & 73)			
Member Co. Shipment	189	76	1637	75	13433	74
Non-Member or unknown T.E.	59	24	545	25	4717	26
<u>Class of Product N.T.E.</u>						
Regulated	22	67	164	60	1410	54
Non-Regulated	1	3	13	5	264	10
Unknown	10	30	94	35	943	36
			(no stats 71, 72 & 73)			
Member Co. Shipment N.T.E.	17	52	151	56	1336	48
Non-Member or Unknown N.T.E.	16	48	120	44	1455	52
U. S. Coast Guard	7		(no stats 71 & 72)			
W-2	278					
W-3	42					

D

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DISTRIBUTION, ENERGY & ENGINEERING

CMA 055028

DISTRIBUTION, ENERGY & ENGINEERING

REPORT TO THE REVIEW COMMITTEE

SUMMARY

The Distribution, Energy & Engineering Division is responsible for the administration of three CMA standing committees - Distribution, Energy and Engineering Advisory. These committees represent diverse interest areas and generally have little in common.

The Chemical Information Group, formerly a separate committee but became part of the Patent and Information Retrieval Committee in 1978 until separated in 1980, was discontinued in June, 1981 upon vote of the Executive Committee.

Division staff members were active and effective participants in planning and implementing committee recommendations regarding several legislative and regulatory proposals. During the year division committees developed and prepared 62 CMA statements and comments to congressional committees and regulatory agencies. Several of these involved oral presentations before congressional committees or regulatory agencies. Also, CMA commented on many proposed national equipment standards that would substantially affect the chemical process industry. Issue comments by committee were:

Distribution - 28
Energy - 34
Engineering - 26

Major issues having a substantial affect on our member companies, usually involving legislative amendments and regulatory reforms, with which staff and committee personnel are deeply concerned and involved are:

- Rail Regulatory Reform - Implementation of 1980 Act
- Northeast Rail Service Act - 1981 (Conrail)
- Amendment to the Hazardous Materials Transportation Act
- Amendments to the Hazardous Materials Transportation Regulations - involving safety, uniformity and "deregulation" approach
- National Energy Plan III
- Natural Gas Issues - including gas utility rate design
- Energy Emergency Preparedness
- Fuel Use Act Implementation
- Public Utility Regulatory Policies Act
- Energy Reporting Burden

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- Energy Conservation Standards of the American Society of Heating, Refrigeration and Air Conditioning Engineers
National Electrical Code Revisions
- Continuation of the National Voluntary Standards System
Requirements for Pressure Vessel Inspection

Although operating short-handed for several months, professional staff members administered 122 meetings of CMA standing committees and their appointed task group and work groups during the past year.

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INTRODUCTION

Actions and proposals of the Administration, Congress and Regulatory Agencies are causing considerable strain on our efforts to maintain a good balancing act. As a general rule, deregulation of regulations having an economic impact are favored. Uniformity of safety regulations on the national level is favored. It is too early to judge the full impact of the Reagan Administration's approaches to regulatory reform.

The Energy Committee activities are becoming more important to member companies as energy policies assume a higher national priority. The Reagan Administration's actions on regulatory reform and congressional efforts toward correcting ill-conceived energy legislation should provide ample opportunity to advocate CMA's long standing position in favor of a deregulated energy market. This past year CMA addressed a broad range of energy issues and various legislative proposals and in regulatory programs under seven energy related laws.

Legislative and regulatory activity affecting the distribution of chemicals was high during 1980-81. Generally, priorities were established on the basis of the potential impacts of government or carrier proposals. Also, CMA supports proposals for improving safety and a better environment and opposing those which do not. Some of the high priority issues had little effect on CMA budget because of the important participation of highly qualified technicians from member companies.

Some important gains were made in the area of Engineering standards, particularly those which provided for strengthening the voluntary standards system and upgrading the National Electrical Code, giving consideration to recommendations to the chemical process industry.

Open committee meetings have been particularly effective in bringing more member companies into the decision making process. This communication link is essential and it is a significant help towards arriving at a better consensus industry position on controversial issues.

COMMITTEE ACHIEVEMENTS

Distribution Committee

Rail Regulatory Reform - The Staggers Rail Act enacted late in 1980 was designed to improve the financial health of the rail industry by providing railroads with greater pricing flexibility. Shipper protection was not a primary concern of the proponents, although it became a major issue of chemical shippers. CMA was successful in introducing language into this legislation to assure that the captive rail shipper has recourse against unreasonably high rates.

Implementation of the Staggers Rail Act by the Interstate Commerce Commission required:

- definition of Railroad Revenue Adequacy,
- definition of Market Dominance,
- determination of Cost Recovery Percentage, and
- other proceedings to implement the Act.

CMA prepared and presented comments in each significant ICC proceeding (14 filings including appeals). These comments will support subsequent litigation when it becomes necessary (two appeals of unfavorable ICC decisions have been filed in the U. S. Court of Appeals).

Northeast Rail Service Act of 1981 - In 1981, the Administration proposed to withdraw the government subsidization of the Conrail system. Although member companies are dependent on Conrail at many plant sites and no viable alternatives are available, CMA supported the return of Conrail to the private sector. CMA successfully obtained changes to the administration bill to provide for competitive rail service by requiring the Secretary of Transportation to endeavor to sell Conrail as a unit provided it becomes financially healthy and a purchaser is available. Final legislation, signed by the President, incorporated all of the critical CMA objectives:

- elimination of government subsidy,
- transfer to the private sector,
- continuation of essential services,
- preservation of competitive rail service in the Northeast, and
- voice by shippers in the final resolution of the Conrail issue.

Hazardous Materials Regulations Act - In 1981, legislation was introduced to amend the Hazardous Materials Transportation Act. Amendments originally proposed would have provided for prenotification and routing of hazardous material shipments. Through the efforts of CMA and other organizations, the

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objectionable provisions have been removed. Proposed legislation now under consideration would permit federal preemption of inconsistent state regulations and provide for study of the routing and prenotification issues. While it is not known at this time whether the revised legislation will pass, a proposed law has been changed from objectionable to strongly supportable.

Safety Regulations - In 1980, the DOT Material Transportation Bureau proposed extensive new regulations to provide improved emergency response communication and identification of hazardous materials. The originally proposed regulations would have:

- greatly expanded technical descriptions on documentation,
- established an additional placarding system, and
- regulated shipments containing low concentrations of EPA hazardous substances or packages of them if the entire shipment contained a "reportable quantity".

CMA recommendations adopted in the final regulations included:

- limiting the expanded technical descriptions,
- revising existing placards rather than requiring additional placards,
- exempting EPA hazardous substances unless a "reportable quantity" was contained in a single package.

The revised rules received strong support from other shipping groups, including motor carriers and emergency services organizations, as substantially improving emergency response communications.

Performance Oriented Packaging - Although DOT/MTB has not yet published its notice of proposed rulemaking, in response to a DOT request, CMA has taken a lead role assisting MTB to develop a proposal to deregulate package specifications and to simplify shipper requirements in Title 49 CFR. The simplified revised regulations should improve understanding and compliance as well as encourage innovation in packaging.

International Regulatory Developments - At the request of DOT/MTB, CMA reviewed and commented on proposals before the United Nations Committee of Experts which affect the transportation of hazardous materials. The United States, in its trade with the rest of the world, will be increasingly subject to U.N. recommendations for the shipment of dangerous goods.

Emergency Service Training Program - The Emergency Service Training Group composed of representatives from CMA and Association of American Railroads has made available to the volunteer fire departments in the United States an Emergency Service Training Program. Over 150,000 volunteer firemen now

have a better understanding of how to respond to hazardous material incidents in transportation.

Energy Committee

National Energy Plan III - As a follow-up to our support of Administration action in moving toward an unregulated energy market, CMA's views for a successful program to improve national energy security were presented to OMB, the Department of Energy and members of Congress. The program must include the following elements:

- Natural gas wellhead price decontrol must be achieved in an orderly and expeditious manner, and this must be accompanied by elimination demand constraints, such as incremental pricing and prohibitions under the Fuel Use Act.
- The Fuel Use Act (FUA), while well intended, is ineffective now, and will be completely redundant in a decontrolled energy marketplace. Industrial sections of the FUA should be repealed.
- DOE should provide a nucleus for an emergency preparedness implementation organization to make use of the established resources of government, industry and public interests to respond to a severe petroleum supply shortage.
- Environmental and economic energy policies should be more carefully balanced.

While the NEP III submitted to Congress July 15 did not make specific new legislative proposals, or call for repeal of existing legislation, it did note that two main assumptions of the Natural Gas Policy Act are no longer valid. It also concludes that increased reliance on market decisions is a far better policy than reliance on government dictates, or combination of subsidies and regulations.

Natural Gas Issues - CMA was successful in opposing DOE proposals for gas utility rate design which could have cost members in excess of \$1 billion annually. We maintain that rates imposed on various classes of customers on a given distribution system should accurately reflect the respective cost of service.

CMA was successful in support of a Federal Energy Regulatory Commission (FERC) rule under the Natural Gas Policy Act (NGPA) which provides an exemption from incremental pricing surcharges for natural gas used in mechanical cogeneration facilities. The rule became effective March 1, 1981.

CMA submitted comments to DOE on emergency allocation of natural gas, objecting to the narrow definition of "high-priority use", and a requirement that plant shutdown is proposed as a condition for the use of natural gas plant protection. We also urged the Economic Regulatory Administration (ERA) to consult closely with the FERC in the implementation of energy authorities.

CMA supported the FERC's proposals: to permanently establish a single-tier, high sulfur No. 6 alternative fuel price ceiling, and to discontinue the metropolitan areas basis for incremental pricing rules. At the same time, CMA restated opposition to market ordering mechanisms, such as the incremental pricing regulations under Title II of the Natural Gas Policy Act.

More recently, CMA wrote Congressman Phil Gramm (D.-TX) to indicate support for the major elements of H.R. 4390 which he introduced on August 4. Congressman Gramm's proposal addresses the following principal CMA concerns for correcting deficiencies of existing statutes:

- The coordinated removal of both supply and demand constraints.
- Smooth and orderly phase-up by a date certain of all natural gas wellhead ceiling prices to market clearing levels.
- Free market access for all consumers, pipelines, and distributors to all categories of gas, including gas from the Outer Continental Shelf (OCS).

Decontrol of all natural gas, unifying the interstate and intrastate natural gas markets into one, will stimulate the development and use of alternate fuels, improve energy conservation, and provide a more rational basis for future planning. Decontrol will increase natural gas costs, but decontrol is necessary to remove artificial competitive inequities, and to obtain greater assurance of adequate future energy supplies.

As a group, CMA members constitute the largest industrial consumer of natural gas. The chemical industry consumes over 10% of total U.S. natural gas use - an estimated 3% for feedstocks, and over 7% for process fuel and other uses.

CMA will work to have Congress address these important issues, and for improvements to H.R. 4390. Specific proposals from the Administration will most likely depend upon reaction to H.R. 4390.

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Energy Emergency Preparedness - CMA submitted comments to the DOE to recommend alternatives to proposed allocation and rationing schemes for energy emergency preparedness. It is our view that market forces will manage a moderate petroleum supply shortfall more effectively than rigid controls. Government intervention in the marketplace should occur only in a severe supply emergency, and broad industry participation should be sought in all phases of specific implementation plans. CMA also contributed to the joint industry/DOE study on energy emergency preparedness which was carried out by the National Petroleum Council.

Earlier, CMA comments contributed to the DOE decision to rescind objectionable regulations, such as the compressed workweek and vehicle-use sticker measures under the Emergency Energy Conservation Act of 1979.

Also, CMA urged DOE to proceed with necessary corrections to the current standby allocation regulations under the Emergency Petroleum Allocation Act (EPAA) to assure equitable treatment for petrochemical feedstocks. Petroleum has been deregulated, and the standby rules have been revoked.

CMA commented to the Senate Committee on Energy and Natural Resources, and testified before the House Subcommittee on Fossil and Synthetic Fuels, urging maximum reliance on market forces to allocate whatever shortage exists after fuel switching and conservation measures are taken. CMA urged the government to take steps which we believe will lessen the impact of any future major shortfall. Response mechanisms that require action by the Administration include:

- plans for deployment of the strategic petroleum reserve;
- removal of restraints on increased domestic production, and distribution of all energy sources;
- removal of impediments on the increased imports of energy, except as may be required to meet International Energy Agency commitments; and
- plans for reducing petroleum consumption through removal of impediments to fuel substitution.

The EPAA will expire September 30, 1981. The Reagan Administration does not favor new legislation. Instead, maximum reliance on market forces is advocated. Also it is believed that the President has adequate emergency power under other laws. However, many new legislative proposals have been introduced in Congress. While we strongly oppose allocation of petroleum products, if such a system is initiated, the system should recognize the differing growth pattern of fuel and nonfuel petroleum uses, the unsubstitutable nature

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of most petrochemical feedstocks, and the beneficial impact of petrochemicals on the economy.

Fuel Use Act Implementations - Final rules for major fuel-burning-installations indicate that CMA was successful in obtaining major improvements. CMA also testified and submitted comments, and held discussions with the DOE on segments of the rules which were reissued. Potential regulatory problems for industry remain, due to the broad discretionary power granted to the Secretary of Energy in the FUA.

CMA testified April 23 before the Subcommittee on Energy Regulation of the Senate Energy and Natural Resources Committee to express concerns regarding the FUA. In our view, FUA is ineffective, and we stated that economics and competitive forces are the most effective means of moving industry to greater use of coal. CMA recommended that Congress repeal the Sections of the Act which apply to major fuel-burning-installations.

The Reagan Administration initiated efforts to streamline the FUA regulatory program. In testimony before DOE July 14, CMA commended these efforts, and recommended further improvements. CMA urged the DOE to remove unnecessary and unjustified obstacles for petitioners seeking cogeneration exemptions.

Public Utility Regulatory Policies Act (PURPA) - Title III of PURPA provides for a study of gas utility rate design, and in the past, DOE has used this authority to propose marginal cost pricing of gas to industrial consumers. CMA engaged a consultant to assist in summarizing and interpreting a DOE-sponsored study of rate design, to compare the DOE study to requirements specified in PURPA, and to analyze the DOE recommended "economic cost" rate design proposals.

The study cost \$26,155. It was appended to the CMA's September 10, 1980 statement to DOE in opposition to the rate design proposals. We conclude the study was effective and that DOE is not likely to propose new gas utility rate design based on marginal cost pricing policies.

Energy Reporting Burden - CMA was successful in efforts to reduce the reporting burden imposed by the DOE Energy Information Administration (EIA). The OMB rescinded approval of EIA form 463, "1980 Survey of Large Combustors in Manufacturing". CMA wrote on behalf of members urging the DOE to return the survey forms which had already been submitted, and to destroy related files and workpapers. CMA has assurance that member company identity has been removed from EIA files, and we expect an opportunity to review a draft of the EIA report on this topic.

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The Reagan Administration has under review a bill entitled, "Energy Information Administration Amendments Act of 1981", with the stated objective of reducing costs and the public reporting burden which is of vital concern to CMA members. CMA will respond to this legislation proposal. Many EIA activities are curtailed due to budget constraints.

Member Company Energy Conservation Progress - Member company energy conservation data indicates that in 1980 the chemical industry used about 22.1% less energy per unit of output compared to 1972, which is identical to the conservation progress reported for 1979, despite an estimated 4.5% decline in industry operating rates during 1980. The CMA members aggregate rate of energy conservation progress has improved about 4% each year between 1976 and 1979.

The business recession has had an adverse impact on energy conservation progress, but aggregate performance betters the government's January 1980 target by more than 8 percentage points, and we believe the 1985 CMA voluntary industry goal of 30% energy reduction per unit of output compared with 1972 is achievable. CMA was the first trade association to establish an energy conservation goal for 1985. We believe this was an important factor in convincing DOE to recommend keeping this a voluntary industry effort.

Other - CMA is currently opposing efforts of the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) to develop an energy conservation standard for existing industrial buildings. CMA and other industrial groups oppose the audit and reporting provisions of the standard which includes process energy use, and are concerned because it could be adopted by State regulatory bodies as a mandatory standard.

Engineering Advisory Committee

Industrial Equipment Efficiency Act - The committee developed CMA positions on S.1398 (Industrial Equipment Efficiency Act), and on DOE's proposed report to Congress. Also, the chairman of the Energy Efficiency Standards Task Group testified for CMA at the DOE hearing. CMA's documentation of extensive use of high efficiency motors in the chemical industry for economic reasons was instrumental in DOE's recommending against mandatory use of high efficiency motors in their final report to Congress. Impractical and unnecessary mandatory requirements were forestalled for both pumps and motors.

Electrical Safety Standards - CMA actively participated in a successful effort to secure NFPA approval of electrical safety standards intended for adoption by OSHA. Probable result is a substantial reduction in cost (estimated to be at least 0.25% of total consumption cost for a typical chemical plant) in

having to provide a motor disconnect switch at each piece of equipment.

Voluntary Codes and Standards - CMA promoted strengthening of the voluntary system by recommending to ANSI a joint private sector-government advisory committee to develop a complete statement of policy on international standardization, supporting the thrust of the Plan for ANSI Implementation of the National Policy on Standards, commenting on the draft revised ANSI Procedures for the Development and Coordination of American National Standards, and commenting on the Department of Commerce proposed procedures for implementation of the OMB Circular "Federal Participation in Development and Use of Voluntary Standards."

Scope changes to two pressure vessel inspection documents being canvassed for adoption as American National Standards were recommended by CMA. The chemical industry is included in the scope of the API standard which has acceptable provisions, and excluded from the scope of the National Board Inspection Code which does not. Hence, should both documents be approved as is likely, the committee will have contributed to a substantial lessening of industry concern about needless disruption of plant operations caused by unreasonable inspection requirements.

CMA succeeded in getting the draft NFPA standard on Electrical Equipment Maintenance returned to committee at the 1980 NFPA Annual Meeting. CMA's concern in that effectiveness of equipment grounding conductors will be judged by unreliable tests. Member company safety people and insurance companies are seeking corrective action.

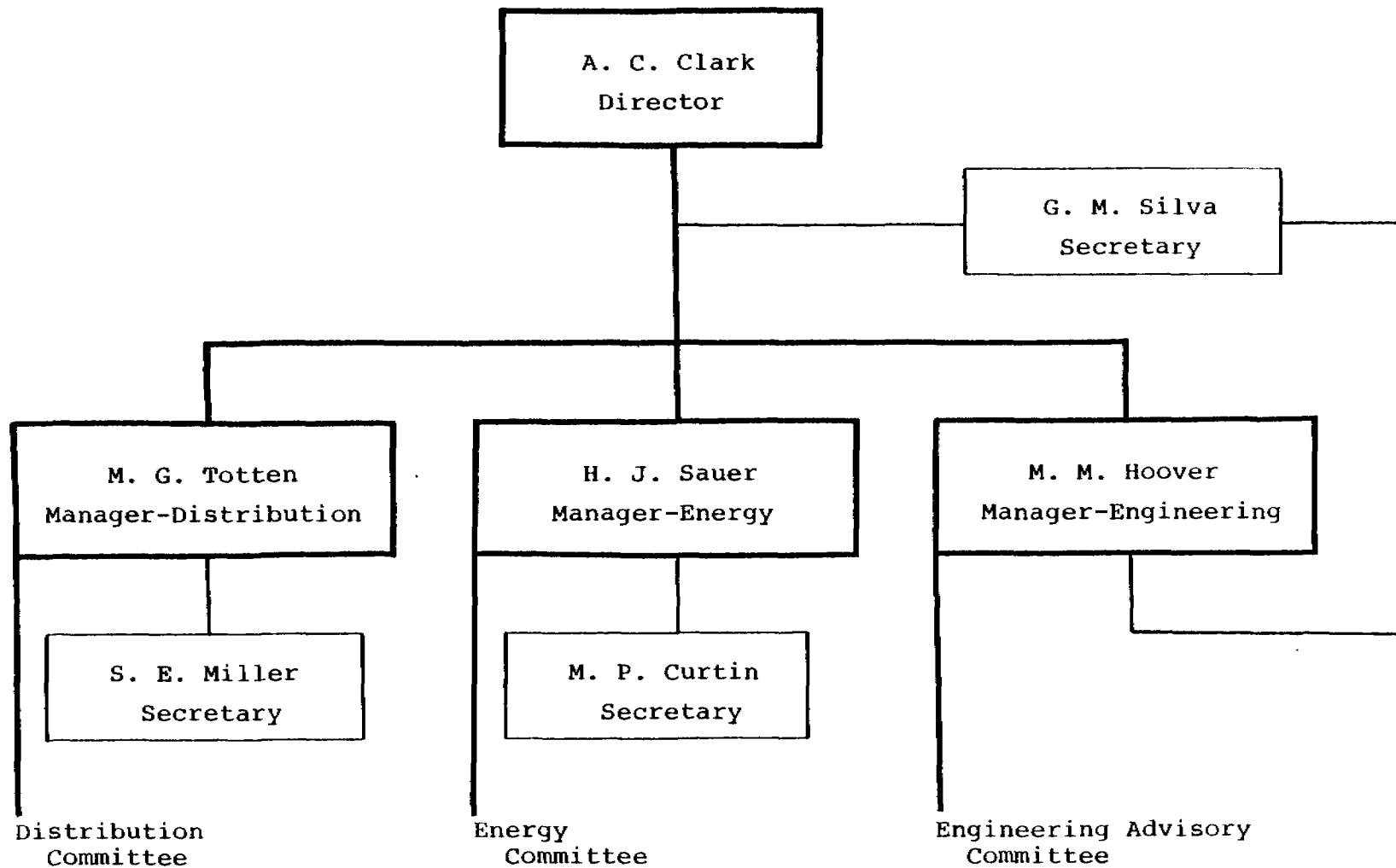
The committee prepared CMA voting positions on 12 UL and NEMA standards proposed for adoption as American National Standards. Cumulative effect will lead to substantial cost savings and improved safety.

DIVISION ORGANIZATION

Currently authorized personnel includes four professionals and three secretaries. The accompanying chart shows the division organization. Not shown are the miscellaneous and varying duties and responsibilities of all staff members.

Mr. Max G. Totten joined the staff in early January to take over management of the Distribution Committee and all related activities. Ms. S. Elaine Miller joined CMA in early June to become Mr. Totten's secretary.

DISTRIBUTION, ENERGY AND ENGINEERING DIVISION



CMA 055041

DISTRIBUTION COMMITTEE

Charter: With respect to physical distribution of chemicals including equipment, facilities, packaging and transportation matters significant to the chemical industry, the Committee will:

- Serve as a forum for discussion of chemical industry concerns.
- Develop policies and positions on legislative, regulatory and technical questions.
- Take action on these policies and positions, including participation in proceedings of regulatory and legislative bodies, as determined to be in the best interest of the Association to the intent consistent with Association policies and guidelines.
- Provide support for Association programs authorized.

Members:

Term Ending May 31, 1982

L. E. Anderson	Amoco Chemicals Corporation
S. F. Burke	Air Products & Chemicals, Inc.
H. D. Midkiff	Tennessee Eastman Company
W. B. Rose	Witco Chemical Corporation
O. M. Watson	Olin Corporation

Term Ending May 31, 1983

C. D. Carley	Hooker Chemical Company
R. A. Christman	Mobay Chemical Corporation
A. C. Fennimore	American Cyanamid Company
P. R. Malcolm	El Paso Products Company
J. M. Roberts	Phillips Petroleum Company

Term Ending May 31, 1984

L. L. Dintiman	Union Carbide Corporation
D. G. Griffin	PPG Industries, Inc.
H. G. Miller	The Lubrizol Corporation
E. D. Olmo	Shell Chemical Company
H. Shrank	FMC Corporation

General Legislation & Regulations Task Group

Charter: To monitor and recommend Key Issues to the Distribution Committee in all areas of legislation and regulations that involves shipments by more than one mode.

B - June 1981 M - 2 F - 8 S - May 1982
Chm: L. L. Dintiman - Union Carbide Staff: M. G. Totten

HM Incidents & Statistics Working Group

Charter: To review and recommend improvements to DOT data gathering procedures and published statistics on transportation incidents involving hazardous materials.

B - June 1981 M - 5 F - 2-4 S - May 1982
Chm: C. D. Carley - Hooker Chemical Staff: M. G. Totten

Highway Task Group

Charter: To monitor and recommend appropriate actions to be taken on all aspects of highway freight transportation including legislation, regulations, carrier rules and operation, freight costs and inter-industry liaison with motor carriers.

B - June 1981 M - 2 F - 2-4 S - May 1982
Chm: S. F. Burke - Air Products Staff: M. G. Totten

Long Range Planning Task Group

Charter: To prepare and recommend long range plans for the committee outlining areas of distribution activity that should be addressed and liaisons that should be established, focusing on subjects perceived as future major concerns.
Also, recommend and monitor committee operations and administration and recommend changes in the procedures and organizations to improve efficiency and effectiveness.

B - June 1981 M - 3 F - 4 S - May 1982
Chm: L. E. Anderson - Amoco Chemicals Staff: M. G. Totten

(Key: B - Beginning Date, M - Number of Members, F - Frequency of Meetings, S - Sunset Date)

Marine and International Task Group

Charter: To monitor and recommend appropriate actions to be taken by CMA on all aspects of domestic and international marine transportation including legislation (U.S.A. and trading partners), regulations, equipment and operation.

B - June 1981 M - 8 F - 4-6 S - May 1982
Chm: H. G. Miller - Lubrizol Staff: M. G. Totten

Packaging Task Group

Charter: To influence the development of legislation, domestic and international regulations that impact packaged chemicals.

B - June 1981 M - 6 F - 2-3 S - May 1982
Chm: J. M. Roberts - Phillips Petro. Staff: M. G. Totten

Loading, Blocking & Bracing Work Group

Charter: In conjunction with representatives of carrier groups and regulatory bodies, recommend test methods and evaluation criteria to prove restraining method efficiency for the shipments of hazardous materials, eliminate loss of contents, limit deformation rupture of packages and avoid damage to carrier equipment.

B - June 1981 M - 10 F - 2-3 S - May 1982
Chm: P. J. Kirby - Tennessee Eastman Staff: M. G. Totten

International Packaging Regulations Work Group

Charter: To coordinate a CMA program to harmonize domestic and international packaging regulations and to facilitate the movement of chemicals in international trade at minimum package costs while maintaining continued safety in transportation.

B - June 1981 M - 8 F - 8 S - May 1982
Chm: S. Kuzma - Allied Chemical Staff: M. G. Totten

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Rail Transportation Task Group

Charter: To monitor public, carrier and related activities that affect Rail Transportation of chemicals--including legislation, regulations, carrier rules and operation, freight costs, car compensation and other--to recommend CMA position and actions and to effect timely CMA advocacy on these matters.

B - June 1981 M - 4 F - 3-4 S - May 1982
Chm: D. G. Griffin - PPG Industries Staff: M. G. Totten

Rail Regulations Working Group

Charter: To monitor all governmental commercial regulatory activities affecting rail transportation of chemicals, to recommend CMA positions and action, to promulgate and to advocate CMA positions on all appropriate governmental regulations.

B - June 1981 M - 6 F - 10-20 S - May 1982
Chm: G. Arnold - Ethyl Corp. Staff: M. G. Totten

Rail Legislative Working Group

Charter: To monitor all governmental legislative activities affecting rail transportation of chemicals, to recommend CMA positions and actions, to promulgate and to advocate CMA positions on all appropriate governmental legislation.

B - June 1981 M - 4 F - 4 S - May 1982
Chm: J. H. Norton - Dupont Staff: M. G. Totten

Rail Special Projects Working Group

Charter: To develop recommendations on those projects assigned by the Chairman of the Rail Transportation Task Group.

B - June 1981 M - 2 F - 2 S - May 1982
Chm: L. E. Anderson - Amoco Chemicals Staff: M. G. Totten

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Transportation Equipment Task Group

Charter: To continuously monitor and report on activities pertaining to legislative, regulatory and other action (i.e. AAR rules) regarding transportation equipment and to develop and advocate policies and CMA positions on legislative, regulatory and technical questions where appropriate.

B - June 1981 M - 5 F - 4 S - May 1982
Chm: H. Shrank - FMC Corporation Staff: M. G. Totten

Rail Equipment Working Group

Charter: To monitor and recommend action to be taken on the operating and mechanical aspects of the private rail car fleet supplied by the chemical industry, except in matters related to car compensation.

B - June 1981 M - 13 F - 5 S - May 1982
Chm: R. E. Phillips - Ethyl Corp. Staff: M. G. Totten

Tank Car Bottom Discontinuities Working Group

Charter: To seek relief from or delay of retrofitting schedule imposed by the railroads for certain tank cars with bottom discontinuities.

B - June 1981 M - 4 F - 3 S - May 1982
Chm: H. D. Midkiff - Tennessee East. Staff: M. G. Totten

Transportation Safety Task Group

Charter: To monitor and recommend appropriate actions to be taken on all aspects of transportation safety, including regulations and legislation not the responsibility of a modal task group.

B - June 1981 M - 2 F - 2 S - May 1982
Chm: E. D. Olmo - Shell Chemical Staff: M. G. Totten

Emergency Service Training Work Group

Charter: Administer and coordinate Emergency Services Training Program in cooperation with the Association of American Railroads.

B - June 1979 M - 7 F - 5 S - May 1982
Chm: A. M. Albera - PPG Industries Staff: M. G. Totten

CHEMTREC Advisors Work Group

Charter: To provide guidance and counsel to the Director, CHEMTREC, on matters involving policies and activities of the program, and to assist in executing improvements to the program including a presentation of workshops of emergency response teams and on the detail of handling emergencies.

B - June 1981 M - 8 S - May 1982
Chm: R. L. Way - Shell Chemical Staff: J. C. Zercher

Analysis of Transportation Accidents Working Groups

Charter: To monitor progress of AAR data sampling and analysis procedures comparing accident experience with the operating environment and to consult with AAR in the preparation of the preliminary report.

B - June 1979 M - 4 F - 4 S - May 1982
Chm: R. E. Wilson - Stauffer Chemical Staff: M. G. Totten

ENERGY COMMITTEE

Charter: With respect to energy conservation and energy utilization matters significant to the chemical manufacturing industry, the Committee will: serve as a forum for discussion of chemical manufacturing industry concerns; develop and recommend to the Executive Committee policies and positions on legislative, regulatory, and technical questions; develop and oversee operation of a system of volunteer energy conservation reporting to appropriate government agencies; and provide support for authorized Association programs.

Members:

Term Ending May 31, 1982

William Hanzel	Nalco Chemical Company
Edwin C. Howe	Ashland Chemical Company
Bruce A. Melaas	Celanese Chemical Co, Inc.
Ronald L. Johnson	Dow Corning Corporation
George E. Knowles	Diamond Shamrock Corp.

Term Ending May 31, 1983

James D. Beatty, Chairman	The Procter & Gamble Co.
Ernest C. Fredericks	Engelhard Minerals & Chem. Corp.
Charles P. Fullerton, Vice Chairman	Monsanto Company
Daniel M. Greeno	Stauffer Chemical Co.
E. K. Grigsby	Phillips Chemical Co.

Term Ending May 31, 1984

Kenneth E. Cox	Tennessee Eastman Co.
Quentin F. Ebert	PPG Industries, Inc.
Thomas A. Gamble	Hercules Incorporated
Edward H. Mergens	Shell Chemical Co.
Lawrence L. Saphier	Dow Chemical U.S.A.

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Data Analysis and Reporting Task Group

Charter: To maintain the system and work for improvements in the CMA energy conservation reporting program, analyze the related DOE Energy Information Administration's reporting requirements, and coordinate CMA response to EIA and OMB on reporting issues. Also, analyzes and develops, as needed, proposals for legislation that would limit DOE's information gathering authority, and provide for protection of confidential information.

B - June 1976 M - 18 F - 7 S - May 1982
Chm: E. C. Howe - Ashland Chemical Staff: H. J. Sauer

Energy Policy Development Task Group

Charter: To develop broad CMA energy position papers and responses, to energy-related Congressional actions including CMA testimony and comments to Congress and the Administration.

B - June 1981 M - 22 F - 8 S - May 1982
Chm: C. P. Fullerton - Monsanto Staff: H. J. Sauer

Fuel Use Task Group

Charter: To develop recommended regulatory response and recommended remedial legislation regarding the Fuel Use Act of 1978, and to serve as a technical resource for identification and analysis of issues related to coal conversion, cogeneration and combined cycle technology, including proposals for new legislation.

B - June 1977 M - 13 F - 10 S - May 1982
Chm: E. H. Mergens - Shell Chemical Staff: H. J. Sauer

Gas and Utility Regulations Task Group

Charter: To analyze impact and develop recommended CMA response to regulatory programs under the Natural Gas Policy Act, including gas rate design proposals and FERC regulatory activity affecting the chemical industry's natural gas use.

B - June 1978 M - 19 F - 10 S - May 1982
Chm: G. E. Knowles - Diamond Shamrock Staff: H. J. Sauer

ENGINEERING ADVISORY COMMITTEE

Charter: With respect to engineering design, construction, operation and maintenance of facilities for manufacture, storage, and handling of industrial chemicals as significant to the chemical manufacturing industry, the committee will: serve as a forum for discussion of chemical manufacturing industry concerns, develop and recommend to the Executive Committee policies and positions on legislative, regulatory, and technical questions; and provide support for authorized Association programs.

Members: Term Ending May 31, 1982

H. B. Addoms	Hooker Chemical Company
W. G. Canham	Monsanto Company
D. R. Canterbury	Sherex Chemical Company
C. C. Neely	Union Carbide Corporation
G. E. Twitchell	Chevron Chemical Company

Term Ending May 31, 1983

J. C. Arnold	El Paso Products Company
T. W. Booth	Tennessee Eastman Company
J. L. Jackson	Borg-Warner Chemicals, Inc.
R. L. Klausmeier, Chairman	E. I. du Pont de Nemours & Co.
B. B. Pearlman	Stauffer Chemical Company

Term Ending May 31, 1984

J. S. Bardin, Vice Chairman	Allied Chemical
R. G. Jobe	Shell Chemical Company
W. T. McNair	Celanese Corporation
R. E. Olsen	Exxon Chemical Company
P. G. Stevens	Amoco Chemicals Corporation

CMA 055050

Steering Task Group

Charter: To recommend committee action on critical matters, and to act for the committee in these matters when circumstances so dictate.

B - June 1979 M - 5 F - 4 S - June 1982
Chm: J. S. Bardin - Allied Chemical Staff: M. M. Hoover

Boiler and Pressure Vessel Inspection Task Group

Charter: To develop and pursue CMA positions regarding a national standard for inspection of boilers and pressure vessels.

B - July 1978 M - 9 F - 2 S - June 1982
Chm: C. R. Carder, Jr. - Union Carbide Staff: M. M. Hoover

Electrical Codes and Standards Task Group

Charter: To participate in development of revisions to the 1981 National Electrical Code and related codes and standards of special interest to the chemical industry.

B - July 1978 M - 20 F - 3 S - June 1984
Chm: J. A. Stewart - FMC Corporation Staff: M. M. Hoover

Large Electric Motors Task Group

Charter: To plan and conduct biennial technology transfer forums on large electric motors (above NEMA frame size, and over 600 volts), critique the forums, and propose future action.

B - April 1980 M - 8 F - 2 S - June 1983
Chm: L. B. McClung - Union Carbide Staff: M. M. Hoover

Process Control Task Group

Charter: To plan and conduct biennial technology transfer forums on mini- and micro- computers for process control, critique the forums, and propose future action.

B - July 1978 M - 6 F - 2 S - June 1982
Chm: T. W. Booth - Tennessee Eastman Staff: M. Hoover

STAFF TRAINING AND ORIENTATION PROGRAMS

Although some versatality is necessary, staff professionals are employed on the basis of their education, experience and technical expertise. Broader and more specific training related to trade association (CMA) activities, policies and procedures is a continuing process and usually the responsibility of the Division Director over a period of time. Also during the year, Mr. Sauer and Mr. Totten attended Association Management Programs conducted by the U.S. Chamber of Commerce.

Secretaries are required to have the basic skills upon employment but need additional training to become more familiar with CMA procedures and organizations. Supplemental training of all supporting staff during the past year included an "Effective Writing Course" (U.S. Dept. of Agriculture). Also, Mrs. Silva attended a PBX Dimensions training program and familiarization training in the new filing system.

Staff conducts an orientation for incoming committee and task group members. The orientation includes discussion of CMA organization, policies, the budget process, procedures for the operation of the committee, anti-trust concerns and any review of key issues. Also covered are the role of committees, interface with staff, and the expectancies of committee members in terms of attendance, participation, and commitment.

At the beginning of each fiscal year, committee chairmen meet with Mr. Roland and Department Directors for an overview of CMA organization, operations and goals. Individually, chairmen meet with the Division Director and staff for a more detailed review of policies and procedures relating to their committee specifically.

MAIN GOALS AND OBJECTIVES

To a large extent many division committee goals established last year were met. However, many issues remain active including many legislative and regulatory proposals.

Short Range

- Intelligence regarding Department of Transportation and Department of Energy regulatory programs has improved and contacts with key personnel in each agency was enlarged considerably.

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- Presentations to regulatory agencies have been upgraded to include more technical basis.
- Liaison with certain other trade associations has been reestablished particularly in the area of distribution.

Improvements Needed

- Long Range Planning needs to be substantially improved to become more effective.
- More time and greater effort needs to be given to gathering information on future direction of legislation and amendments.

Other goals, specific to committee considerations, include the following:

- Regarding natural gas issues, work to obtain:
 - the coordinated removal of the supply and demand constraints on the market,
 - smooth and orderly phase-up by a date certain of all natural gas well-head ceiling prices to market clearing levels, and
 - free access for all consumers, pipelines, and distributors to all categories of gas including gas from the Outer Continental Shelf.
- Regarding Emergency Preparedness, CMA will advocate maximum reliance on market forces because this appears the most efficient means to distribute resources. CMA will also advocate that steps be taken to lessen the impact of any future major petroleum supply disruptions.
- Reduce the energy reporting burden on member companies by supporting the Administration's proposal to reduce cost and public reporting burden. Also work to improve member company confidentiality and reduce the data base collecting authority, the EIA.
- CMA will continue to support efforts of the Reagan Administration in streamlining the regulatory program to implement the Fuel Use Act. Also, CMA will work to have portions of the Act repealed which pertain to industrial facilities.
- CMA will work to achieve a coordinate national policy that considers both an improved environment and the finite nature of our energy resources.

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- Assure that those parts of OSHA's electrical safety standards not yet promulgated are acceptable to CMA member companies.
- Assure state adoption of pressure vessel inspection and regulations are acceptable to CMA.
- Assure the revisions of 1981 National Electrical Codes are acceptable to CMA.
- Develop meaningful guidelines for evaluating effectiveness of equipment grounding devices and to secure their adoption by a consensus group.
- Obtain an acceptable national standard for pressure vessel inspection if current efforts fail.
- Promote technology transfer in the computers for processing control.
- Achieve protection for the captive chemical shipper, intended in the passage of the Staggers Rail Act, during the implementation procedures before the Interstate Commerce Commission and in the United States courts as necessary.
- Work to assure that chemical shippers will have the choice of two or more competing railroads when Conrail issue is reached.
- Improve hazardous material regulations by eliminating detailed package specifications and by simplifying regulatory requirements for shippers as an initial step.
- Attain national uniformity of hazardous material regulations as a long range project.
- Evaluate hazardous materials tank car assignments and, where appropriate, develop recommendations to improve containment of chemicals during a transportation accident.
- Promote performance oriented hazardous materials regulations.

CMA 055054

DIVISION BUDGET

	FY 80-81		FY 81-82	
	Budget	Actual	Budget	Actual
	(12 mo.)		(12 mo.)	(3 mo.)
Expenses - including:	\$375,100	\$374,362	\$417,600	\$ 90,406
salaries, benefits,				
travel, supplies, etc.				
Research & Consulting				
Energy	50,000	26,155 ^{1/}	40,000	--
Distribution	50,000	23,199 ^{2/}	40,000	--
Legal Fees & Expenses				
Energy	78,700	12,788	38,600	--
Distribution	122,100	110,349 ^{3/}	77,100	--

- 1/ Consultant assisted in summarizing and interpreting DOE sponsored study of gas utility rate design in preparing CMA position and comments. Considered successful because DOE is not likely to propose new gas utility rate design based on marginal cost pricing policies.
- 2/ Cost Accountants and expert witnesses from academia were engaged to assist development and presentation of CMA's position in several proceedings before the Interstate Commerce Commission implementation provisions of the Staggers Rail Act.
- 3/ Outside legal fees and expenses essentially to assist in development and representation of CMA views to the congress during consideration of the Staggers Rail Act and to the ICC during proceedings to implement the Act.

Assistance of consultants, cost accountants, expert witnesses and outside legal firms will be needed to continue processing CMA's position regarding coal conversion, energy legislation, natural gas decontrol, tank car compensation, railroad market dominance, railroad revenue adequacy and rail interchange rules.

LONG-RANGE PLANNING

- Established data basis for development of elemental and total costs involving distribution of chemicals, use of energy, and plant facilities to assist in presenting CMA's views before Congressional, regulatory, code and standards bodies.
- Develop chemical industry position paper on the need for uniformity of regulations governing the transportation of hazardous materials and press preemption of state programs inconsistent with the federal regulations.
- Improve communications with committee and task group members to facilitate development and presentation of CMA comments and statements to the Congress and regulatory agencies.
- Expedite development of resource network of technical personnel in member companies to assist in review of proposals and preparation of responses.
- Work to continue improved agency liaison. This will become more important as DOE is dismantled and various regulatory functions are merged with other groups.
- Work for improved liaison with Congressional staffs. This is particularly important in dealing with energy and distribution issues because legislative amendments on CMA objectives and longer range problems for industry generally begin with Congressional inquiry and debate.
- Continue efforts to improve liaison with allied trade associations to gain broad based industry support for CMA views.
- Improve liaison with selected professional societies because activities of these groups could have more of a detrimental impact on industry than regulatory programs. (For example ASHRAE proposed energy conservation standards for existing buildings).

PROBLEMS AND SOLUTIONS

- Responding to frequent requests for information about the chemical industry - Failure to be able to provide good data to the media, congressional staff and agency personnel places CMA staff at a disadvantage when presenting CMA's views. Also, rapport with reporters and others wanting timely comments suffers. To deal with this, development of data (see Long Range Planning) is planned.

- Budget cut backs by the Administration - For years CMA has had excellent working relationships with the DOT Materials Transportation Bureau and the U. S. Coast Guard. Under the budget proposals, the hazardous materials branches of both could be severely reduced, adversely affecting the chemical industry substantially in both domestic (all modes) and international trade. We need to convince the Secretary of DOT and his office, to continue most of the existing programs.

ADDITIONAL RESOURCES

We need to expand our word processing capability to facilitate preparation and revision of drafts, and preparation of final copies of reports, statements and oral testimony. Prompt availability of working drafts and revised versions expedite the process of review (by committee and task group members) and clearance.

It is recommended that a second entry station be installed and operated by Division personnel during the day. For the present, if the service were to be made available to other Divisions, also recommended, a full time operator would be required.

CMA 055057

DISTRIBUTION, ENERGY & ENGINEERING DIVISION

BIOGRAPHICAL SKETCHES

Division Director - A. C. Clark

Mr. Clark received his Bachelor of Chemical Engineering degree from Clarkson College in 1943. He served in the military service from 1943 to 1946. He then taught Physics at Clarkson College, before joining the Rohm and Haas Company in 1947 as a development production engineer. Later Mr. Clark's responsibilities included establishing standard packaging and warehousing procedures, developing and installing automatic filling and materials handling systems, and developing bulk handling and receiving facilities with customers. He also advised on product labeling and regulatory compliance. Since joining CMA in 1963, Mr. Clark has administered the Chemical Packaging, Transportation Equipment, Engineering Advisory, Distribution, and Plastics Committees. He was Vice President, Technical Director from July, 1973 until February 1979.

Mr. Clark served as secretary to the Chemical Transportation Advisory Committee to the U. S. Coast Guard, and on several occasions served as an industry advisor to the U. S. delegate on the transportation of hazardous materials at United Nations meetings. He has appeared on behalf of CMA before regulatory agencies and Congressional Committees.

Manager, Energy - Henry J. Sauer

Mr. Sauer joined CMA in 1977. He has served as Energy Committee Staff Executive since January 1977, and in a full time capacity since June 1980. Additional CMA responsibilities included: Manager of the Insurance, the Solid Waste Management Committees, Environmental Management Committee Task Groups on New Source Performance Standards for Industrial Boilers, and Process Emission Regulations.

Mr. Sauer received an M.B.A. from the University of Pittsburgh in 1966, and B.S. in Chemical Engineering from Carnegie Mellon University in 1956. He served in the U.S. Army Corps of Engineers from 1956 to 1958, and is a qualified parachutist.

Just prior to CMA, Mr. Sauer was employed for five years as Development Manager with Great Lakes Chemical Corporation. He managed an applications research laboratory for flame retardant chemical specialties, and was responsible for market development planning and sales.

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Appendix

Mr. Sauer served fourteen years with PPG Industries; four years in Market Research developing product line forecasts in the Industrial Chemicals Division and marketing plans for potential new business opportunities, and ten years in the Coating and Resins Division as Assistant to the Sales Manager, and Technical Sales Representative for resin products.

Manager, Engineering - Morgan M. Hoover

Joining CMA in 1965, Mr. Hoover has administered the Labels and Precautionary Information, Chemical Packaging, Transportation Equipment, Nuclear, and Food Drug, and Cosmetic Chemicals Committees. He is currently Staff Executive to the Engineering Advisory Committee.

A 1941 Chemical Engineering graduate of Rensselaer Polytechnic Institute, Mr. Hoover started his career with Du Pont and worked as foreman in the manufacture of nylon, military explosives, and plutonium.

Later he served as a shift supervisor with American Cyanamid engaged in the manufacturing of titanium dioxide pigment from ilmenite ore.

In 1949, Mr. Hoover switched from production supervision to publishing, first as assistant and later associate editor of Chemical Engineering, McGraw-Hill Publishing Co. There he was responsible for writing and editing technical news and feature articles.

Continuing in publishing, Mr. Hoover in 1956 became managing editor, directing all editorial functions, of Modern Materials Handling, Cahners Publishing.

Manager, Distribution - Max G. Totten

Mr. Totten came to CMA in 1981 to serve as Manager, Distribution and Staff Executive to the Distribution Committee.

Prior to joining CMA, Mr. Totten was responsible for the safe and legal transportation of hazardous materials via all modes in domestic and international trade.

Mr. Totten was employed at ICI Americas in Wilmington, Delaware from 1973 to 1981. There he developed company training and compliance programs for distribution of regulated chemicals. He also established and administered the company emergency response program.

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Appendix

From 1959 thru 1973, Mr. Totten was employed by DOW Chemical Inc. His responsibilities there included basic chemical research, rail fleet administration, contract administration, regulatory compliance and packaging.

Mr. Totten is a 1959 graduate of Ferris State College with a degree in chemistry and holds a law degree from LaSalle Extension University.

CMA 055060

E

CMA 055061

ENVIRONMENTAL PROGRAMS

SECTION

E

CMA 055062

REPORT ON THE ACTIVITIES OF THE
ENVIRONMENTAL DIVISION

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SUMMARY OF DIVISION ACTIVITIES

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SUMMARY OF DIVISION ACTIVITIES

The Environmental Division's 1980-81 year was full, diversified and productive. Early in the year, we vigorously advocated against environmental initiatives of the Carter Administration. As 1981 began, we adjusted to actively assist the regulatory reform initiatives in the environmental arena of the new Reagan Administration.

We maintained a staff level suitable to handle current industry environmental interests, and organized air, water, solid waste, Superfund, and general programs to match staff and member company resources. We successfully balanced the priorities and resources with staff and the EMC.

Member company resources for Environmental Division programs increased by 39% in the number of assignments taken.

In all program areas, Environmental Division representatives initiated and/or maintained closer working relationships with EPA at earlier stages in the regulatory process. In addition, we established closer coordination with other CMA departments in order to more effectively implement program priorities.

The year's accomplishments include increased cooperation with other trade associations and interest groups.

We sponsored two Environmental Updates which were successful in informing member company personnel of what CMA is doing and what they should do in the environmental arena. The December 1980 Update featured a workshop on PSD/Nonattainment Permitting and the May 1981 program featured special workshops on waste load allocations for priority pollutants, RCRA regulations, and Superfund implementation.

In addition to the Updates, we sponsored a seminar on the NPDES portion of consolidated permit regulations and one on Superfund implementation, both of which were very successful. Attendance at our Updates and seminars during the past year averaged 180.

In an effort to affect certain changes at the state level, we successfully distributed two very important CMA position papers to agencies and individuals within the states... the CMA Position Paper on Establishment of Water Quality Standards and the CMA Position Paper on EPA's 1980 Water Quality Criteria.

The major accomplishments of the Environmental Division are highlighted below:

Air Programs

CMA 055065

- o We submitted a 4-volume statement on Section 112 to the Senate Environment and Public Works Committee, rebutting scientific

and medical misconceptions on hazardous air pollutants. The statement is a critical element of our advocacy tools for the Clean Air Act Amendment debate.

- o CMA testified before the Senate Environment and Public Works Committee on the national ambient air quality standard setting process. CMA also submitted a full statement for the record on Clean Air Act Amendments.
- o As a result of a CMA judicial suit against EPA, the agency changed its requirement that a state implementation plan (SIP) revision was necessary before every "bubble" permit could be approved. Consequently, EPA approved the New Jersey SIP as originally submitted.
- o As a result of CMA's participation in the nonattainment and prevention of significant deterioration (PSD) litigations, substantial modifications to the PSD regulations and proposed changes to the nonattainment regulations that are favorable to industry have resulted.
- o We are working with the Texas Chemical Council in developing process emission regulation issues and in our contracted reanalysis of the Houston Area Oxidants Study data.

Water Programs

- o A CMA meeting with the Office of Management and Budget (OMB) and the Bush Regulatory Relief Task Force resulted in indefinite suspension of the pretreatment regulation until completion of a regulatory impact analysis pursuant to Executive Order 12291.
- o CMA's Best Management Conventional Technology litigation resulted in a favorable ruling remanding the regulations to the agency with instructions to devise a cost-effectiveness test. The ruling should limit the cost of controlling conventional water pollutants for the chemical industry.
- o We have pursued a working relationship with the American Petroleum Institute in a number of water program issues, and held discussions with the Association of Metropolitan Sewerage Agencies regarding the general pretreatment regulations.
- o The Water Policy Task Group developed a CMA Position Paper on the Clean Water Act (CWA) for use during 1982 reauthorization of the Clean Water Act. The paper identifies CMA's concerns with the CWA and suggests specific legislative and administrative changes.

CMA 055066

- o The CMA Position Paper on EPA's 1980 Water Quality Criteria and CMA Position Paper on Establishment of Water Quality Standards were completed and distributed to member companies, trade associations, federal and state agencies, EPA and other interested parties, in order to influence the direction of EPA's regulatory programs in these areas.
- o NPDES consolidated permit litigation settlement negotiations are nearing final resolution. To date, most of the 54 issues have been tentatively settled in a fashion that is favorable to industry.

Solid Waste Programs

- o CMA actively participated in on-going RCRA litigation settlement discussions. To date we have been successful in achieving a number of desired changes to the RCRA implementing regulations. Among other things, EPA has dropped six of eight proposed facility location standards, adopted more acceptable incinerator standards, postponed a ban on liquid ignitables in landfills, and proposed reduced liability coverage.
- o CMA submitted a major set of comments to EPA on the Resource Conservation and Recovery Act (RCRA) Subtitle C regulations for land disposal facility standards.
- o We submitted comments to EPA on their proposed groundwater protection strategy. A critical portion of CMA's comments was the inclusion of a CMA proposed groundwater policy as a regulatory alternative.
- o The intense negotiations on the RCRA consolidated permit litigation resulted in most issues being settled to CMA's satisfaction, with the possibility of all issues ultimately being satisfactorily resolved.

Superfund Programs

- o We submitted extensive oral and written comments to EPA on the National Contingency Plan, including an alternative proposal which encourages greater state participation and presents a reasonable approach to selecting cleanup levels.
- o We developed a CMA position on the state role in Superfund implementation and advocated the adoption of this position to EPA, the states and various state associations.
- o As part of CMA's hazardous waste disposal management program, draft protocols were prepared concerning drum consolidation, drum sampling, health and hygiene monitoring, groundwater monitoring and site management.

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General Programs

- o CMA provided extensive substantive recommendations on 18 environmental issues for CMA's regulatory reform submittal to Vice President Bush. Seven out of CMA's first ten priority issues were environmental.
- o CMA conducted a survey of member companies concerning environmental review (audit) practices. The Environmental Issues Task Group recommended conducting a CMA informational seminar on environmental review for member companies.
- o We implemented a CMA/EPA cooperative five-plant study designed to ascertain whether biological waste treatment is effectively removing priority pollutants. The study and final report will be completed during fiscal year 1982 and submitted to EPA.
- o We cooperated with EPA in a study of recordkeeping and reporting requirements which resulted in a number of agency recommendations that are favorable to industry.
- o CMA established interface with EPA on development and implementation of RCRA Regulatory Impact Analyses.

CMA 055068

INTRODUCTION

CMA 055069

ENVIRONMENTAL MANAGEMENT COMMITTEE

Committee Programs/Membership

<u>Program Area</u>	<u>Committee Coordinator</u>	<u>No. of Task Groups</u>	<u>CMA Staff Representative</u>
Air	L. D. Johnson	3	J. S. Matey
Water	J. F. Byrd	6	R. R. Romano
Solid Waste	J. J. Zimmerman	4	J. J. Mayhew
Superfund	R. J. Reichert	2	J. B. Harvey
General	J. B. Worthington	3	D. W. Carroll
Budget/Planning	W. D. Carpenter	1	A. R. Mayer

Committee Membership

Term Ending May 31, 1982:

*W. C. Jaeschke, Chairman	Stauffer Chemical Company
C. P. Priesing	American Cyanamid Company
*S. N. Robinson, Vice Chairman	Mallinckrodt, Inc.
J. B. Worthington	Diamond Shamrock Corporation

Term Ending May 31, 1983:

J. C. Edwards	Tennessee Eastman Company
P. H. Fournet	Kaiser Aluminum & Chemical Corp.
R. J. Reichert	E. I. du Pont de Nemours & Co.
A. G. Smith	Shell Oil Company

Term Ending May 31, 1984:

J. F. Byrd	The Procter & Gamble Company
W. D. Carpenter	Monsanto Company
J. J. Zimmerman	Hooker Chemical Company
L. D. Johnson	Rohm and Haas Company
E. L. Powers	Mobay Chemical Corporation

D. W. Carroll	CMA Staff Executive
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*Through May 31, 1982

CMA 055070

ENVIRONMENTAL MANAGEMENT COMMITTEE

Purpose/Organization:

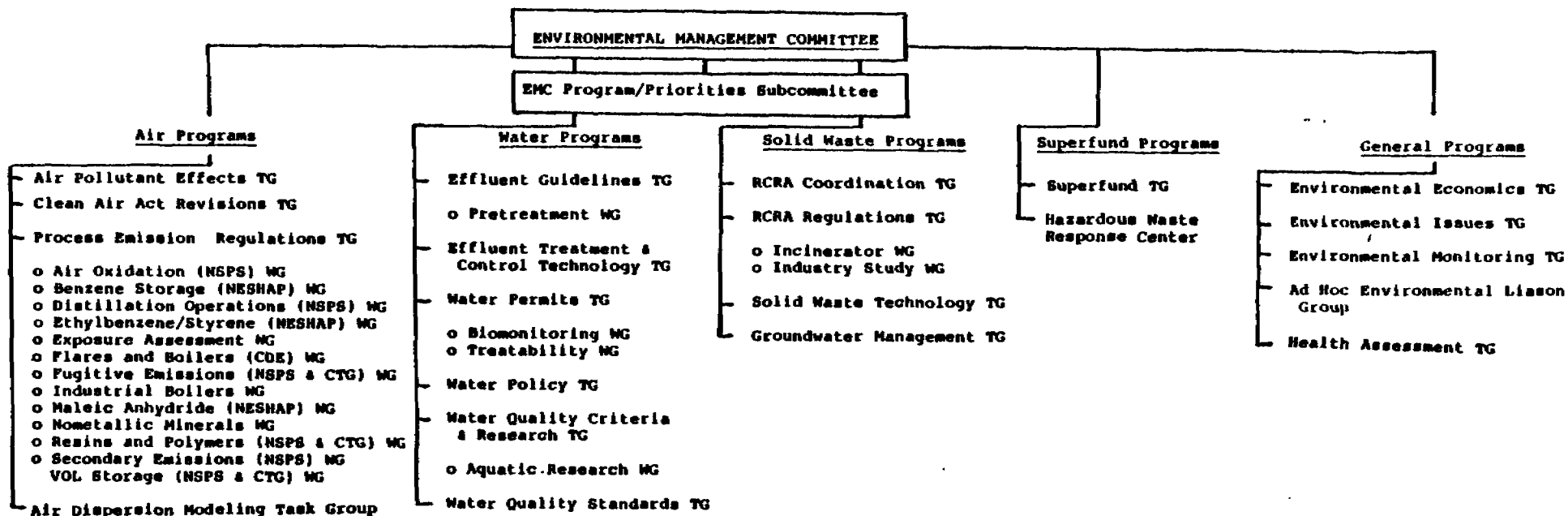
The Environmental Management Committee oversees the Association's environmental activities. The Committee's primary purpose is to direct a continuing program which effectively manages environmental issues of significance to the chemical industry. Specific objectives include:

- o advocating responsible environmental legislation and regulation,
- o seeking relief from unreasonable legislation and regulation, and
- o helping member companies understand their environmental responsibilities.

The 15 member Committee directs its program through specific issue-oriented task groups and work groups organized into six program areas. Each program area is coordinated by a Committee member in conjunction with a CMA staff member. Committee members also serve as Sponsors for one or more task groups. The partnership of Sponsor, Task Group Leader and CMA Staff Executive has proven invaluable in effectively managing the Committee's Environmental Program.

The Committee's program positively advocates responsible and cost effective environmental laws and regulations. The intensity of the program has continued to grow in order to counter the current and potential cost of unnecessary regulation. The program has already saved the industry hundreds of millions of dollars. The Committee's efforts, however, must continue to expand and strengthen to meet an array of difficult challenges.

CMA 055071



TG = Task Group
WG = Work Group

October 1, 1981

CMA 055072

AIR PROGRAMS

EMC COORDINATOR: L. D. JOHNSON
CMA PROGRAM MANAGER: J. S. MATEY
CMA COUNSEL: S. E. GAINES

ENVIRONMENTAL MANAGEMENT COMMITTEE

CHAIRMAN: W. C. JAESCHKE
VICE CHAIRMAN: S. N. ROBINSON
CMA STAFF EXECUTIVE: D. W. CARROLL

AIR POLLUTANT EFFECTS TASK GROUP

LEADER: A. F. POPE
SPONSOR: L. D. JOHNSON
CMA STAFF EXECUTIVE: J. S. MATEY

CLEAN AIR ACT REVISIONS TASK GROUP

LEADER: G. D. CARPENTER
SPONSOR: S. N. ROBINSON
CMA STAFF EXECUTIVE: J. S. MATEY

PROCESS EMISSION REGULATIONS TASK GROUP

LEADER: P. J. SIENKNECHT
SPONSOR: J. C. EDWARDS
CMA STAFF EXECUTIVE: J. S. MATEY

AIR OXIDATION (NSPS) WORK GROUP

LEADER: R. A. SYMULESKI

BENZENE STORAGE (NESHAP) WORK GROUP

LEADER: L. S. GRANGER

DISTILLATION OPERATIONS (NSPS) WORK GROUP

LEADER: J. C. LEDVINA

ETHYLBENZENE/STYRENE (NESHAP) WORK GROUP

LEADER: R. A. SYMULESKI

CMA 055073

AIR PROGRAMS

MISSIONS

GROUP PROFILE

EMC MISSION:

- o ADVOCATE RESPONSIBLE ENVIRONMENTAL LEGISLATION & REGULATION
 - o SEEK RELIEF FROM UNREASONABLE LEGISLATION & REGULATION
 - o HELP MEMBER COMPANIES UNDERSTAND ENVIRONMENTAL RESPONSIBILITIES
- M - 15 F - 15 B - 6/78 D - STANDING COMMITTEE

APE TG MISSION:

- o ANALYZE AIR POLLUTANT HEALTH EFFECTS DATA
 - o EVALUATE & PROVIDE GUIDANCE FOR EPA RESEARCH
 - o GUIDE ESTABLISHMENT OF SCIENTIFICALLY SOUND & FEASIBLE STANDARDS
- M - 6 F - 6 B - 8/78 D - 9/81 SUBJECT TO REVIEW

CAAR TG MISSION:

- o IDENTIFY CRITICAL INDUSTRY ISSUES & DEVELOP POSITIONS & PROPOSALS
 - o PURSUE NEEDED LEGISLATIVE CHANGES IN THE CLEAN AIR ACT
- M - 13 F - 11 B - 9/78 D - 9/81 SUBJECT TO REVIEW

PER TG MISSION:

- o ENSURE ONLY JUSTIFIED NEW SOURCE PERFORMANCE STANDARDS ARE PROPOSED FOR THE SYNTHETIC ORGANIC MANUFACTURING INDUSTRY
 - o PURSUE THE DEVELOPMENT OF COST-EFFECTIVE REQUIREMENTS
- M - 19 F - 6 B - 5/78 D - 9/81 SUBJECT TO REVIEW

AIROX WG MISSION:

- o FOLLOW DEVELOPMENT OF EPA AIR OXIDATION REGULATIONS
 - o WORK WITH EPA TO AFFECT APPROPRIATE REGULATIONS
- M - 10 F - 9 B - 10/79 D - 9/81 SUBJECT TO REVIEW

BEN STOR WG MISSION:

- o MONITOR EPA FORMULATION OF NESHAPS FOR BENZENE STORAGE
 - o POSITIVELY INFLUENCE THE DEVELOPMENT OF THESE NESHAPS
- M - 7 F - 7 B - 4/80 D - 9/81 SUBJECT TO REVIEW

DIST OP WG MISSION:

- o MONITOR EPA FORMULATION OF NSPS FOR DISTILLATION OPERATIONS
 - o POSITIVELY INFLUENCE THEIR DEVELOPMENT
- M - 5 F - 6 B - 6/80 D - 9/81 SUBJECT TO REVIEW

EB/S WG MISSION:

- o FOLLOW DEVELOPMENT OF EPA NESHAPS FOR ETHYLBENZENE/STYRENE
 - o POSITIVELY INFLUENCE THEIR FORMULATION
- M - 13 F - 7 B - 6/80 D - 9/81 SUBJECT TO REVIEW

AIR PROGRAMS

EMC COORDINATOR: L. D. JOHNSON
CMA PROGRAM MANAGER: J. S. MATEY
CMA COUNSEL: S. E. GAINES

EXPOSURE ASSESSMENT WORK GROUP

LEADER: W. C. HUTTON

FLARES AND BOILERS (CDE) WORK GROUP

LEADER: C. B. BECK

FUGITIVE EMISSIONS (NSPS & CTG) WORK GROUP

LEADER: J. D. MARTIN

INDUSTRIAL BOILERS WORK GROUP

LEADER: O. K. BUTCHER

MALEIC ANHYDRIDE (NESHAP) WORK GROUP

LEADER: N. B. GALLUZZO

NONMETALLIC MINERALS WORK GROUP

LEADER: W. M. REITER

RESINS AND POLYMERS (NSPS & CTG) WORK GROUP

LEADER: V. A. BOWMAN

CMA 055075

SECONDARY EMISSIONS (NSPS) WORK GROUP

LEADER: W. R. FAIRHELLER

AIR PROGRAMS
MISSIONS
GROUP PROFILE

EX ASSES WG MISSION:

- REVIEW AND DEVELOP COMMENTS ON THE SAI/SRI EXPOSURE ASSESSMENT REPORTS
- M - 5 F - 4 B - 9/80 D - 9/81 SUBJECT TO REVIEW

FLARES WG MISSION:

- MONITOR EPA DEVELOPMENT OF AGENCY POSITION ON USE OF FLARES AND BOILERS AS CENTRAL VEHICLES
- M - 8 F - 2 B - 6/80 D - 9/81 SUBJECT TO REVIEW

FUG WG MISSION:

- ASSURE THE DEVELOPMENT OF TECHNICALLY SOUND FUGITIVE EMISSION REGULATIONS
- M - 7 F - 6 B - 4/79 D - 9/81 SUBJECT TO REVIEW

IB WG MISSION:

- FOLLOW AND INFLUENCE EPA REGULATIONS ON INDUSTRIAL BOILERS
- M - 11 F - 3 B - 1/81 D - 9/81 SUBJECT TO REVIEW

MA WG MISSION:

- MONITOR AND WORK WITH EPA IN FORMULATION OF APPROPRIATE NESHAPS FOR MALEIC ANHYDRIDE
- M - 11 F - 5 B - 10/79 D - 9/81 SUBJECT TO REVIEW

NMM WG MISSION:

- ADVOCATE AGAINST ESTABLISHING A NSPS FOR NONMETALLIC MINERAL FACILITIES
- M - 8 F - 3 B - 4/79 D - 9/81 SUBJECT TO REVIEW

R&P WG MISSION:

- MONITOR DEVELOPMENT OF EPA NSPS AND CTG FOR RESINS AND POLYMERS
 - EXERT A POSITIVE INFLUENCE
- M - 9 F - 4 B - 10/79 D - 9/81 SUBJECT TO REVIEW

CMA 055076

SEC EM WG MISSION:

- FOLLOW EPA DEVELOPING NSPS FOR SECONDARY EMISSIONS
- M - 4 F - 2 B - 8/80 D - 9/81 SUBJECT TO REVIEW

AIR PROGRAMS

EMC COORDINATOR: L. D. JOHNSON
CMA PROGRAM MANAGER: J. S. MATEY
CMA COUNSEL: S. E. GAINES

VOL STORAGE (NSPS & CTG) WORK GROUP

LEADER: L. S. GRANGER

AIR DISPERSION MODELING TASK GROUP

LEADER: J. D. MARTIN
SPONSOR: L. D. JOHNSON
CMA STAFF EXECUTIVE: J. S. MATEY

CMA 055077

AIR PROGRAMS
MISSIONS
GROUP PROFILE

VOL WG MISSION:

- o MONITOR EPA DEVELOPMENT OF NSPS AND CTG FOR VOL STORAGE
- M - 6 F - 4 B - 4/80 D - 9/81 SUBJECT TO REVIEW

AM TG MISSION:

- o ASSURE THAT TECHNICALLY AND SCIENTIFICALLY SOUND AIR MODELS ARE DEVELOPED
 - o ASSURE CAREFUL VALIDATION OF MODELS
- M - 7 F - 8 B - 6/81 D - 9/81 SUBJECT TO REVIEW

KEY: M = NUMBER OF MEMBERS
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CMA 055078

WATER PROGRAMS

EMC COORDINATOR: J. F. BYRD
CMA PROGRAM MANAGER: R. R. ROMANO
CMA COUNSEL: S. E. GAINES

ENVIRONMENTAL MANAGEMENT COMMITTEE

CHAIRMAN: W. C. JAESCHKE
VICE CHAIRMAN: S. N. ROBINSON
CMA STAFF EXECUTIVE: D. W. CARROLL

EFFLUENT GUIDELINES TASK GROUP

LEADER: R. F. ROCHELEAU
SPONSOR: VACANT
CMA STAFF EXECUTIVE: R. R. ROMANO

PRETREATMENT WORK GROUP

LEADER: H. J. CAMPBELL

EFFLUENT TREATMENT AND CONTROL TECHNOLOGY TASK GROUP

LEADER: VACANT
SPONSOR: E. L. POWERS
CMA STAFF EXECUTIVE: R. R. ROMANO

WATER PERMITS TASK GROUP

LEADER: M. A. PIERLE
SPONSOR: A. G. SMITH
CMA STAFF EXECUTIVE: R. R. ROMANO

BIOMONITORING WORK GROUP

LEADER: R. C. ZEHNTNER

TREATABILITY MANUAL WORK GROUP

LEADER: R. C. ZEHNTNER

WATER POLICY TASK GROUP

LEADER: E. C. LADD
SPONSOR: J. F. BYRD
CMA STAFF EXECUTIVE: R. R. ROMANO

CMA 055079

WATER PROGRAMS

MISSIONS

GROUP PROFILE

EMC MISSION:

- o ADVOCATE RESPONSIBLE ENVIRONMENTAL LEGISLATION & REGULATION
 - o SEEK RELIEF FROM UNREASONABLE LEGISLATION & REGULATION
 - o HELP MEMBER COMPANIES UNDERSTAND ENVIRONMENTAL RESPONSIBILITIES
- M - 15 F - 15 B - 6/78 D - STANDING COMMITTEE

EG TG MISSION:

- o ENSURE THE DEVELOPMENT OF SOUND & COST-EFFECTIVE EFFLUENT LIMITATIONS FOR WASTEWATER REGULATIONS
 - o ASSIST MEMBERS IN THE DEVELOPMENT OF STATE REQUIREMENTS
- M - 18 F - 10 B - 6/78 D - 9/81 SUBJECT TO REVIEW

PRETREAT WG MISSION:

- o FOLLOW AND INFLUENCE EPA'S DIRECTION ON PRETREATMENT
 - o LITIGATE THE GENERAL PRETREATMENT REGULATIONS AS NEEDED
- M - 8 F - 9 B - 10/78 D - 9/81 SUBJECT TO REVIEW

ETCT TG MISSION:

- o EVALUATE THE TECHNICAL BASIS EPA USES TO DEVELOP GUIDELINES FOR ADVANCED WASTE TREATMENT & PURSUE NEEDED IMPROVEMENTS
 - o MONITOR AND INFLUENCE EPA'S TREATMENT TECHNOLOGY
- M - 8 F - 8 B - 5/80 D - 9/81 SUBJECT TO REVIEW

PERMITS TG MISSION:

- o PURSUE DEVELOPMENT OF REASONABLE & COST-EFFECTIVE WATER PERMITS
 - o ENSURE THE RESULTING REGULATIONS DO NOT IMPEDE THE INDUSTRY'S ABILITY TO OBTAIN PERMITS ON A TIMELY BASIS
- M - 13 F - 18 B - 6/78 D - 9/81 SUBJECT TO REVIEW

BIO MON WG MISSION:

- o INFLUENCE EPA'S DIRECTION IN THE USE OF EFFLUENT TOXICITY TESTING (BIOMONITORING) IN THE REGULATORY ARENA
- M - 5 F - 6 B - 2/81 D - 9/81 SUBJECT TO REVIEW

TREAT WG MISSION

- o EVALUATE EPA'S TREATABILITY MANUAL AND RECOMMEND APPROPRIATE CHANGES IN THE MANUAL
- M - 6 F - 5 B - 10/81 D - 9/81 SUBJECT TO REVIEW

CMA 055080

POLICY TG MISSION:

- o EVALUATE WATER ISSUES AFFECTING CMA POLICY & RECOMMEND RESOLUTIONS
 - o WORK TOWARD CLEAN WATER ACT AMENDMENTS TO PROMOTE THE DEVELOPMENT OF REASONABLE & COST-EFFECTIVE REGULATIONS
- M - 16 F - 15 B - 2/80 D - 9/81 SUBJECT TO REVIEW

WATER PROGRAMS

EMC COORDINATOR: J. F. BYRD
CMA PROGRAM MANAGER: R. R. ROMANO
CMA COUNSEL: S. E. GAINES

WATER QUALITY CRITERIA AND RESEARCH TASK GROUP

LEADER: R. J. MOOLENAAR
SPONSOR: C. P. PRIESING
CMA STAFF EXECUTIVE: R. R. ROMANO

AQUATIC RESEARCH WORK GROUP

LEADER: R. E. BAILEY

WATER QUALITY STANDARDS TASK GROUP

LEADER: R. J. HANSON
SPONSOR: A. G. SMITH
CMA STAFF EXECUTIVE: R. R. ROMANO

CMA 055081

WATER PROGRAMS
MISSIONS
GROUP PROFILE

WQC&R TG MISSION:

- ASSESS THE SOUNDNESS OF WATER QUALITY CRITERIA ON A COMPOUND-BY-COMPOUND BASIS, AND ENSURE THEIR VALIDITY
- MONITOR & INFLUENCE EPA'S WATER RESEARCH PROGRAM

M - 14 F - 12 B - 6/78 D - 9/81 SUBJECT TO REVIEW

AQ RES WG MISSION:

- DEVELOP CMA'S AQUATIC RESEARCH PROGRAM
- FOLLOW EPA'S AQUATIC RESEARCH PROGRAM

M - 4 F - 9 B - 10/80 D - 9/81 SUBJECT TO REVIEW

WQS TG MISSION:

- ENSURE THE PROPER USE OF WATER QUALITY CRITERIA & OTHER FACTORS IN THE DEVELOPMENT OF STATE STANDARDS
- ASSIST IN THE DEVELOPMENT OF STATE PROGRAMS

M - 11 F - 10 B - 6/79 D - 9/81 SUBJECT TO REVIEW

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CMA 055082

SOLID WASTE PROGRAMS

EMC COORDINATOR: J. J. ZIMMERMAN
CMA PROGRAM MANAGER: J. J. MAYHEW
CMA COUNSEL: R. G. STOLL

ENVIRONMENTAL MANAGEMENT COMMITTEE

CHAIRMAN: W. C. JAESCHKE
VICE CHAIRMAN: S. N. ROBINSON
CMA STAFF EXECUTIVE: D. W. CARROLL

RCRA REGULATIONS TASK GROUP

LEADER: P. A. PALMER
SPONSOR: VACANT
CMA STAFF EXECUTIVE: J. J. MAYHEW

INCINERATOR WORK GROUP (RCRA)

LEADER: S. L. DANIELS

INDUSTRY STUDY WORK GROUP (RCRA)

LEADER: G. E. BALCH

SOLID WASTE SITING & PERMITTING TASK GROUP

LEADER: VACANT
SPONSOR: J. J. ZIMMERMAN
CMA STAFF EXECUTIVE: J. J. MAYHEW

SOLID WASTE TECHNOLOGY TASK GROUP

LEADER: F. M. CHARLES
SPONSOR: VACANT
CMA STAFF EXECUTIVE: J. J. MAYHEW

GROUNDWATER MANAGEMENT TASK GROUP

LEADER: J. M. KUSZAJ
SPONSOR: J. J. ZIMMERMAN
CMA STAFF EXECUTIVE: J. B. HARVEY

CMA 055083

SOLID WASTE PROGRAMS
MISSIONS
GROUP PROFILE

EMC MISSION:

- o ADVOCATE RESPONSIBLE ENVIRONMENTAL LEGISLATION & REGULATION
 - o SEEK RELIEF FROM UNREASONABLE LEGISLATION & REGULATION
 - o HELP MEMBER COMPANIES UNDERSTAND ENVIRONMENTAL RESPONSIBILITIES
- M - 15 F - 15 B - 6/78 D - STANDING COMMITTEE

RCRA REGS TG MISSION:

- o WORK WITH EPA TO ENSURE THE DEVELOPMENT OF SOUND & REASONABLE REGULATIONS FOR SOLID WASTE MANAGEMENT
- M - 15 F - 55 B - 6/78 D - 9/81 SUBJECT TO REVIEW

INCIN WG MISSION:

- o PROVIDE TECHNICAL SUPPORT TO RCRA REGULATIONS TASK GROUP IN DEVELOPMENT OF COMMENTS FOR INCINERATOR STANDARDS
 - o PROVIDE TECHNICAL GUIDANCE TO GENERAL COUNSELS OFFICE ON LITIGATION OF MATTERS DEALING WITH INCINERATION REGULATIONS
- M - 8 F - 6 B - 6/80 D - 9/81 SUBJECT TO REVIEW

IND STDY WG MISSION:

- o ASSIST RCRA REGULATIONS TASK GROUP IN REVIEWING EPA'S "INDUSTRY STUDY" EFFORTS TO LIST ADDITIONAL WASTES
 - o PROVIDE EPA WITH CMA'S VIEWPOINT ON SPECIFIC ASPECTS OF THE "INDUSTRY STUDY"
- M - 6 F - 6 B - 2/81 D - 9/81 SUBJECT TO REVIEW

SOLID WASTE SITING & PERMITTING TASK GROUP:

- o ENSURE BEST INTERESTS OF THE CHEMICAL INDUSTRY ARE SERVED BY PROVIDING MEMBER COMPANIES, STATE & REGIONAL AUTHORITIES WITH INFORMATION AND PROPOSALS FOR WASTE MANAGEMENT
 - o FOLLOW SOLID WASTE SITING & PERMITTING ISSUES
- M - 15 F - 4 B - 6/78 D - 9/81 SUBJECT TO REVIEW

SW TECH TG MISSION:

- o PROVIDE GUIDANCE ON SOLID WASTE TECHNOLOGY
- M - 8 F - 12 B - 9/79 D - 9/81 SUBJECT TO REVIEW

GW TG MISSION:

- o DEVELOP INTEGRATED SYSTEMS APPROACH PROGRAM TO ADDRESS GROUNDWATER ISSUES
 - o ENSURE THAT THE MULTIPLE USE OF GROUNDWATER IS PROTECTED TO THE EXTENT POSSIBLE, WHILE SUPPORTING CONTROL FOR THE PROTECTION OF HUMAN HEALTH
- M - 16 F - 17 B - 3/80 D - 9/81 SUBJECT TO REVIEW

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CMA 055084

SUPERFUND PROGRAMS

EMC COORDINATOR: R. J. REICHERT
CMA PROGRAM MANAGER: J. B. HARVEY
CMA COUNSEL: D. D. EVANS

ENVIRONMENTAL MANAGEMENT COMMITTEE

CHAIRMAN: W. C. JAESCHKE
VICE CHAIRMAN: S. N. ROBINSON
CMA STAFF EXECUTIVE: D. W. CARROLL

SUPERFUND TASK GROUP

LEADER: C. L. SERCU
SPONSOR: R. J. REICHERT
CMA STAFF EXECUTIVE: J. B. HARVEY

HAZARDOUS WASTE RESPONSE CENTER

LEADER: J. M. WESLEY
SPONSOR: J. F. BYRD
CMA STAFF EXECUTIVE: J. J. MAYHEW

CMA 055085

SUPERFUND PROGRAMS

MISSIONS

GROUP PROFILE

EMC MISSION:

- o ADVOCATE RESPONSIBLE ENVIRONMENTAL LEGISLATION & REGULATION
 - o SEEK RELIEF FROM UNREASONABLE LEGISLATION & REGULATION
 - o HELP MEMBER COMPANIES UNDERSTAND ENVIRONMENTAL RESPONSIBILITIES
- M - 15 F - 15 B - 6/78 D - STANDING COMMITTEE

SF TG MISSION:

- o FORMULATE AND COMMUNICATE CMA POSITIONS ON SUPERFUND IMPLEMENTATION USING THE BEST TECHNICAL AND LEGAL RESOURCES
- M - 13 F - 8 B - 12/80 D - 9/81 SUBJECT TO REVIEW

STAG MISSION:

- o PROVIDE TECHNICAL ADVICE TO GOVERNMENT AGENCIES FOR CLEAN-UP OF ABANDONED HAZARDOUS WASTE DISPOSAL SITES
 - o DEVELOP TECHNICAL PROTOCOLS TO BE USED IN CLEANING UP HAZARDOUS WASTE DISPOSAL SITES
- M - 14 F - 30 B - 9/79 D - 9/81 SUBJECT TO REVIEW

KEY: M = NUMBER OF MEMBERS
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CMA 055086

GENERAL PROGRAMS

EMC COORDINATOR: J. B. WORTHINGTON
CMA COORDINATOR: D. W. CARROLL

ENVIRONMENTAL MANAGEMENT COMMITTEE

CHAIRMAN: W. C. JAESCHKE
VICE CHAIRMAN: S. N. ROBINSON
CMA STAFF EXECUTIVE: D. W. CARROLL

ENVIRONMENTAL ECONOMICS TASK GROUP

LEADER: H. G. HAIGHT, JR.
SPONSOR: W. D. CARPENTER
CMA STAFF EXECUTIVE: VACANT

ENVIRONMENTAL ISSUES TASK GROUP

LEADER: E. W. CALLAHAN
SPONSOR: J. B. WORTHINGTON
CMA STAFF EXECUTIVE: D. W. CARROLL

ENVIRONMENTAL MONITORING TASK GROUP

LEADER: J. E. NORRIS
SPONSOR: J. B. WORTHINGTON
CMA STAFF EXECUTIVE: J. S. MATEY

AD HOC ENVIRONMENTAL LIAISON GROUP

LEADER: VACANT
SPONSOR:
CMA STAFF EXECUTIVE: A. R. MAYER

EMC PROGRAM/PRIORITIES SUBCOMMITTEE

CHAIRMAN: W. D. CARPENTER
CMA STAFF EXECUTIVE: A. R. MAYER

CMA 055087

GENERAL PROGRAMS

MISSIONS

GROUP PROFILE

EMC MISSION:

- ADVOCATE RESPONSIBLE ENVIRONMENTAL LEGISLATION & REGULATION
- SEEK RELIEF FROM UNREASONABLE LEGISLATION & REGULATION
- HELP MEMBER COMPANIES UNDERSTAND ENVIRONMENTAL RESPONSIBILITIES

M - 15 F - 15 B - 6/78 D - STANDING COMMITTEE

ECON TG MISSION:

- ESTABLISH PROGRAM FOR QUANTIFYING THE COSTS OF EACH STEP OF THE ENVIRONMENTAL REGULATORY PROCESS
- PROVIDE SUPPORT TO SPECIFIC TASK GROUP & ISSUE REQUIRED EFFORTS

M - 6 F - 4 B - 6/78 D - 9/81 SUBJECT TO REVIEW

ISSUE TG MISSION:

- IDENTIFY EMERGING ENVIRONMENTAL ISSUES & PROPOSE COURSE OF ACTION
- RECOMMEND PRIORITIES AMONG NEW ISSUES & EXISTING ACTIVITIES

M - 9 F - 9 B - 6/79 D - 6/81 SUBJECT TO REVIEW

MON TG MISSION:

- ENSURE THE SCIENTIFIC INTEGRITY OF EPA SAMPLING METHODS, MONITORING PROCEDURES AND ANALYTICAL PROTOCOLS
- SUPPORT ENVIRONMENTAL PROGRAMS IN THESE AREAS OF EXPERTISE

M - 11 F - 8 B - 6/78 D - 6/81 SUBJECT TO REVIEW

LIAISON GP MISSION:

- COORDINATE DISSEMINATION OF CASE-SPECIFIC INFORMATION TO ORGANIZATIONS WITHIN THE STATES

M - 11 F - 2 B - 2/81 D - 6/81 SUBJECT TO REVIEW

BUDGET SC MISSION:

- DEVELOP ANNUAL RESEARCH/CONSULTING BUDGET PROPOSAL FOR EMC/CMA APPROVAL
- ASSIST THE EMC IN MANAGING ITS RESEARCH AND CONSULTING BUDGET
- PERIODICALLY UPDATE RESEARCH AND CONSULTING PRIORITIES

M - 6 F - 6 B - 8/79 D - 6/81 SUBJECT TO REVIEW

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CMA 055088

ENVIRONMENTAL MANAGEMENT COMMITTEE
MEMBER COMPANY RESOURCES
Committee/Task Group/Work Group Assignments

<u>Company</u>	<u>No. People</u>	<u>No. Assignments</u>	<u>Company</u>	<u>No. People</u>	<u>No. Assignments</u>
Air Products & Chemicals, Inc.	1	1	Kay-Fries, Inc.	1	1
Allied Corporation	15	25	Koppers Company, Inc.	1	1
American Cyanamid Company	5	9	Mallinckrodt, Inc.	3	5
American Hoechst Corporation	2	2	3M Company	2	2
Amoco Chemicals Corporation	2	7	Mobay Chemical Corporation	5	7
Anaconda Copper Company	1	1	Mobil Chemical Company	2	3
Arapahoe Chemicals, Inc.	1	1	Monsanto Company	23	41
ARCO Chemical Company	8	17	Nalco Chemical Company	2	4
Ashland Chemical Company	3	5	Occidental Petroleum	1	1
BASF Wyandotte Corporation	1	1	Olin Corporation	6	6
Borg-Warner Chemicals, Inc.	1	1	Owens-Corning Fiberglas Corporation	1	1
Cabot Corporation	1	1	Oxirane Corporation	1	1
Calgon (Merck & Co., Inc.)	1	1	Pfizer Inc.	1	1
Celanese Corporation	4	7	Phillips Chemical Company	1	1
CIBA-GEIGY Corporation	1	3	PPG Industries, Inc.	2	2
Conoco Inc.	3	4	The PQ Corporation	1	1
Cosden Oil & Chemical Company	1	1	The Procter & Gamble Company	7	20
Diamond Shamrock Corporation	2	7	Reichhold Chemicals, Inc.	1	1
Dow Chemical USA	25	51	Reynolds Metals Company	1	1
Dow Corning Corporation	1	1	Rohm and Haas Company	6	14
E. I. Du Pont de Nemours & Company	25	50	Shell Chemical Company	12	13
Eastman Kodak Company	4	6	SOHIO	3	3
El Paso Products Company	1	1	Stauffer Chemical Company	14	25
Essex Chemical Corporation	1	1	Sun Petroleum Products Company	1	1
Exxon Chemical Company	9	19	Tenneco Chemicals, Inc.	1	1
FMC Corporation	5	12	Tennessee Eastman Company	8	22
General Electric Company	1	1	Texaco Chemical Company	1	1
Georgia-Pacific Corporation	2	2	Texas Eastman Company	1	1
The BFGoodrich Company	1	1	Union Carbide Corporation	22	37
Gulf Oil Chemicals Company	2	2	Uniroyal Chemical Co.	2	3
Hercules Incorporated	2	3	USS Chemicals	3	4
Hooker Chemical Company	4	4	Velsicol Chemical Corporation	2	2
ICI Americas Inc.	4	7	Virginia Chemicals Inc.	1	2
Kaiser Aluminum & Chemical Corp.	2	5	Vulcan Materials Company	1	1

TOTALS: 68 Companies 282 People 490 Assignments

ENVIRONMENTAL MANAGEMENT COMMITTEE

Member Company Resources
Committee/Task Group/Work Group Assignments

	<u>No. Companies Represented</u>	<u>No. Personnel</u>	<u>No. Assignments</u>
1978/79	36	170	191
1979/80	53	205	353
1980/81	68	281	490
Increase (80 vs 81)	28%	37%	39%

COMMITTEE ACHIEVEMENTS

1980-1981

CMA 055091

AIR PROGRAMS

Achievements 1980-1981

Legislative:

- o CMA testified before the Senate Environment and Public Works Committee on the national ambient air quality standard setting process. CMA also submitted a full statement for the record on Clean Air Act Amendments.
- o We submitted a 4-volume statement on Section 112 to the Senate Environment and Public Works Committee, rebutting scientific and medical misconceptions on hazardous air pollutants. The statement is a critical element of our advocacy tools for the Clean Air Act Amendment debate.
- o The Clean Air Act Revisions Task Group maintained an active involvement with the National Commission on Air Quality during the course of its study and report to Congress.

Regulatory:

- o As a result of a CMA judicial suit against EPA, the agency changed its requirement that a state implementation plan (SIP) revision was necessary before every bubble permit could be approved. Consequently, EPA approved the New Jersey SIP as originally submitted.
- o As a result of CMA's participation in the nonattainment and prevention of significant deterioration (PSD) litigations, substantial modifications to the PSD regulations and proposed changes to the nonattainment regulations that are favorable to industry have resulted.
- o CMA presented testimony at EPA's public hearings on:
 - a proposed national emissions standard for hazardous air pollutants (NESHAP) for benzene emissions from ethylbenzene/styrene plants,
 - a proposed new source performance standard for fugitive emissions from the synthetic organic chemicals manufacturing industry, and
 - a proposed NESHAP for benzene storage emissions.

CMA 055092

- o CMA staff and task group members provided the substantive documentation on the following priority issues for CMA's regulatory reform submittal to Vice President Bush:
 - national ambient air quality standard for ozone,
 - the listing and regulation of benzene as a "hazardous air pollutant" under Section 112 of the Clean Air Act,
 - control technique guidelines,
 - new source performance standards for industrial boiler emissions,
 - airborne carcinogen policy,
 - prevention of significant deterioration and nonattainment area permitting requirements,
 - control technique guidelines for fugitive emissions from the synthetic organic chemical manufacturing industry, and
 - proposed new source performance standard for fugitive emissions from the synthetic organic chemical manufacturing industry.
- o CMA submitted to EPA 26 sets of comments on various draft and proposed process emission regulations.
- o CMA submitted comments to EPA on proposed visibility requirements for Class I areas and on proposed PSD Set II (NO_x, CO, ozone) regulations.
- o CMA presented testimony at five NAPCTAC hearings on various draft control technique guidelines.
- o CMA submitted extensive critical comments on the SRI and SAI documents "Human Exposure to Atmospheric Concentrations of Selected Chemicals." The documents are being used by EPA to set priorities for listing under Section 112.
- o CMA submitted comments to the California Air Resources Board in response to their proposed Alternative Emission Control Measure (Bubble Rule) to Source-Specific Emissions.
- o We contracted with SRI International to conduct a reanalysis of the epidemiological data developed during the Houston Area Oxidants Study (HAOS). The HAOS is the most comprehensive field study ever done on oxidants.
- o We presented oral testimony at two Science Advisory Board Subcommittee meetings.

CMA 055093

- o CMA managed the following contractor studies:
 - benzene impact analysis of ethylbenzene/styrene plants,
 - critique of EPA's background information document (BID) for new source performance standards for industrial boilers, and
 - analysis of background information for generic regulation of air oxidation processes.

Community/Public Relations:

- o CMA completed and distributed a communications package setting forth in layman's terms our positions on Clean Air Act Amendments. The package is being used to clarify and publicize the CMA recommended changes to the Clean Air Act.

CMA 055094

WATER PROGRAMS

Achievements 1980-1981

Legislative:

- o The Water Policy Task Group developed a CMA Position Paper on the Clean Water Act (CWA) for use during the 1982 reauthorization of the Clean Water Act. The paper identifies CMA's concerns with the CWA and suggests specific legislative and administrative changes.

Regulatory:

- o CMA submitted comments to EPA on a variety of draft and proposed regulatory programs, including the following:
 - effluent toxicity testing (biomonitoring),
 - innovative technology for wastewater treatment,
 - water quality criteria modification,
 - the Treatability Manual,
 - proposed work on carbon absorption,
 - proposed rules to relax continuous pH reporting requirements,
 - draft Best Management Practices Guidance Document,
 - draft water quality standards regulations, and
 - the Water Quality Management Plan Section 5.5, (mixing zones).
- o We submitted comments to OMB regarding the excessive paperwork necessary to comply with the NPDES recordkeeping and reporting requirements.
- o We submitted comments to several EPA contractors on the topic of wastewater recycle and reuse.
- o CMA testified at a public hearing on the U.S. Army Corps of Engineers proposed revisions to its water permit regulations.
- o CMA's Water Quality Criteria Position Paper and Water Quality Standards Position Paper were completed and distributed to member companies, trade associations, federal and state agencies, EPA and other interested parties, in order to influence the direction of EPA's regulatory programs in these areas.

- o NPDES consolidated permit litigation settlement negotiations are on-going and may be completed by September. To date, many of the 54 issues have been tentatively settled although it appears that a few issues may not be resolved and will be litigated.
- o The intense negotiations on the consolidated permit litigation resulted in most issues being settled to CMA's satisfaction, with the possibility of all issues ultimately being satisfactorily resolved.
- o CMA's Best Conventional Technology litigation resulted in a favorable ruling remanding the regulations to the agency with instructions to devise a cost-effectiveness test. The ruling should limit the cost on controlling conventional water pollutants for the chemical industry.
- o We managed two research projects on the assimilative capacity of the aquatic environment for chemical compounds. The Phase I chemical fate model is available to member companies upon request.
- o CMA staff and task group members provided substantive details for CMA's regulatory reform submittal to Vice President Bush on the following issues:
 - ambient water quality criteria and standards,
 - general pretreatment regulations,
 - the national pollutant discharge elimination system (NPDES) permitting regulations,
 - best conventional technology regulations,
 - effluent guidelines for the organics, plastics and synthetics industry,
 - permit regulations for controlling certain activities in waters of the United States,
 - toxic pollutant list, and
 - EPA/Natural Resources Defense Council (NRDC) consent decree.
- o EPA's draft Best Management Practices (BMP) Guidance Document was thoroughly reviewed as a result of negotiations with the agency on the underlying NPDES revised regulations.
- o CMA submitted extensive comments to EPA on classification of ammonia as a "toxic" pollutant. EPA subsequently decided not to classify ammonia as a toxic pollutant, thereby saving the chemical industry \$100,000,000 in capital costs.

CMA 055096

- o CMA managed a contractor study to critique two drafts on EPA's effluent toxicity testing (biomonitoring) strategy.
- o We were successful in persuading EPA to delay and reconsider aspects of the implementation of a second round permit strategy. As a result, second round permits will be issued at a slower pace, forestalling the need for companies to make capital investment and operating cost commitments.
- o We completed and distributed an Engineering-Science, Inc. report entitled "A Technical Analysis of the Building Block Methodology for Effluent Limitations Guidelines." The report discredits a fundamental concept EPA had been making in developing effluent guidelines for the chemical industry.
- o A CMA meeting with the Office of Management and Budget (OMB) and the Bush Regulatory Relief Task Force resulted in indefinite suspension of the pretreatment regulation until completion of a regulatory impact analysis pursuant to Executive Order 12291.

Community/Public Relations:

- o The CMA Water Quality Criteria Position Paper and Water Quality Standards Position Paper were completed and distributed to member companies, trade associations, federal and state agencies, EPA and other interested parties, in order to influence the direction of EPA's regulatory programs in these areas.

CMA 055097

SOLID WASTE PROGRAMS

Achievements 1980-1981

Regulatory:

- o CMA submitted a major set of comments to EPA on the Resource Conservation and Recovery Act (RCRA) Subtitle C regulations for land disposal facility standards.
- o Task group members and CMA staff contributed substantive analysis concerning hazardous waste management regulations under RCRA in CMA's submittal to Vice President Bush's Task Force on Regulatory Relief.
- o We completed three RCRA contractor studies, available to member companies upon request:
 - Review of RCRA Regulations Pertinent to Seismic Criteria,
 - Review of Hydrologic Simulation on Solid Waste Disposal Sites (EPA SW-868), and
 - Review of Landfill and Surface Impoundment Performance Evaluation (EPA SW-869).
- o We initiated and maintained an informal relationship with EPA's Office of Solid Waste. This relationship could facilitate day to day discussions and influence the direction of future regulations.
- o The RCRA Regulations Task Group succeeded in achieving a number of desired changes to the RCRA implementing regulations. Among others, EPA:
 - dropped six of eight proposed facility location standards,
 - adopted more acceptable incinerator standards,
 - postponed a ban on liquid ignitables in landfills, and
 - reduced liability coverage (not final).
- o We negotiated many significant changes as part of the RCRA consolidated permit litigation, which has resulted to date in apparent agreement of eight of the nine issues in the lawsuit.

CMA 055098

- o CMA filed 19 sets of comments with EPA addressing various RCRA implementing regulations issues.
- o CMA submitted comments to EPA on their proposed groundwater protection strategy. A critical portion of CMA's comments was the inclusion of a CMA proposed groundwater policy as a regulatory alternative. We also presented testimony at a public hearing on EPA's proposed groundwater protection strategy.
- o The Groundwater Management Task Group submitted a response to the CEQ report on groundwater contamination.
- o The Solid Waste Technology Task Group initiated and continues to manage a contractor study to compare the factors in deciding to use landfills or incinerators to dispose of specific hazardous wastes.
- o CMA managed a contractor analysis of final RCRA regulations documents. The report is available to member companies.
- o We initiated consultant work to develop a model groundwater policy. The study will apply the scheme to two diverse hydrogeological regions of the United States.

CMA 055099

SUPERFUND PROGRAMS

Achievements 1980-1981

Regulatory:

We organized a Superfund Implementation Steering Group to plan and oversee CMA's advocacy program on Superfund.

- o Five Superfund subgroups addressed major sections of rulemaking in EPA's implementation of Public Law 96-510. These subgroups accomplished their initial mission and were disbanded in August. A new, single Superfund Task Group was formed to advocate CMA's positions and address new issues as they arise in the ongoing implementation of Superfund.
- o CMA has closely followed EPA's development of Superfund issues, meeting on numerous occasions with EPA staff, OMB officials, the IRS and the Treasury Department to present CMA's position on the issues.
- o CMA managed a contract with A. D. Little, Inc., to critique EPA's risk assessment model and develop a CMA pre-screening model for prioritizing inactive waste disposal sites. In a related topic, CMA developed an alternate approach to revising the National Contingency Plan (NCP) and Annexes XII, XIII and XIV. The proposal was submitted to EPA.
- o We developed a CMA position on the state role in Superfund implementation and advocated the adoption of this position to EPA, the states and various state associations.
- o CMA staff and task group members prepared an analysis of the impact (both costs and benefits) of the NCP and the Superfund Excise Tax as part of CMA's submittal to Vice President Bush's Task Force on Regulatory Relief.
- o CMA submitted a proposal for implementation of the Superfund Excise Tax to the IRS.
- o CMA commented on EPA's old site notification form. CMA's technical suggestions were adopted by EPA in their final form.
- o We submitted extensive oral and written comments to EPA on the National Contingency Plan, including an alternative proposal which encourages greater state participation and presents a reasonable approach to selecting cleanup levels.

CMA 055100

Education:

- o CMA sponsored a Superfund Implementation Seminar attended by 180 member company representatives.

Hazardous Waste Response Center (HWRC)

Community/Public Relations:

- o Hazardous waste response teams provided technical advice to EPA at abandoned hazardous waste sites in Texas and New Jersey.
- o A hazardous waste response team responded to an EPA request for a preliminary site analysis at the Williams property in New Jersey.

Education:

- o As part of CMA's hazardous waste disposal management program, draft protocols were prepared concerning drum consolidation, drum sampling, health and hygiene monitoring, groundwater monitoring and site management.

CMA 055101

GENERAL PROGRAMS

Achievements 1980-1981

Legislative:

- o The EMC created an ad hoc Environmental Liaison Group to coordinate dissemination and collection of case-specific environmental information with organizations within the states. The activities of this group will be closely integrated with CMA's new state activities program.
- o The EMC recommended creation of a new Health Assessment Task Group to address chronic health effects and carcinogenesis. The initial project will concentrate on Section 112 issues under the Clean Air Act.

Regulatory:

- o We implemented a CMA/EPA cooperative five-plant study designed to ascertain whether biological waste treatment is effectively removing priority pollutants. The study and a final report will be completed during FY82 and submitted to EPA.
- o CMA filed technical, public policy and legal comments with EPA on proposed LIDAR methodology for determining opacity using advanced untested laser technology.
- o We developed a research consulting project request and evaluation form for use in budget planning and subsequent management.
- o CMA managed a study by Booz, Allen & Hamilton to evaluate costs/benefits of four major regulatory programs:
 - water quality criteria and standards,
 - nonattainment/PSD,
 - new source performance standards for industrial boilers, and
 - RCRA incinerator and land disposal facility regulations.

The study findings and contractor's analyses were a significant element in CMA's submittal to Vice President Bush's Regulatory Relief Task Force.

CMA 055102

- o The EMC finalized and successfully delivered a CMA Position Paper on the Establishment of State Water Quality Standards and a CMA Position Paper on EPA's 1980 Water Quality Criteria, through the Environmental Liaison network, to state personnel and regulatory agencies.
- o The Environmental Economics Task Group prepared regulatory cost data for the purpose of developing and prioritizing EMC's annual budget.
- o We developed an open and cooperative working arrangement with EPA's Office of Solid Waste, concentrating on regulatory impact analysis activities of this EPA program office.
- o The EMC sunset the Environmental Communications Task Group after completion of its mission.
- o The EMC created an ad hoc Environmental Liaison Group to coordinate dissemination and collection of case-specific environmental information to and from organizations within the states. The activities of this group will be closely integrated with CMA's new state activities program.

Education:

- o CMA conducted a survey of member companies concerning environmental review (audit) practices. The Environmental Issues Task Group recommended conducting a CMA informational seminar on environmental reviews for member companies.

CMA 055103

STRUCTURE OF DIVISION TO MANAGE PROGRAMS

CMA 055104

STRUCTURE OF DIVISION TO
MANAGE PROGRAMS

The Environmental Division is staffed and program assignments are made so that qualified individuals work closely with member company personnel assigned to the Environmental Management Committee and its task groups and work groups. The program assignments are made so that an individual handles related projects while one individual will be assigned multi-media assignments in order to balance work loads and assure that qualified back-up support is available.

Over the past year, the Environmental Division has concentrated on ensuring closer coordination with CMA staff in other departments in order to assure effective implementation of policy developed by the EMC, its task groups and work groups. This closer internal coordination will also facilitate communications and coordination among the various standing committees that have an interest in a topic. In addition, CMA will be utilizing in a more cost-effective manner the limited resources that are available to advocate positions on priority topics.

CMA 055105

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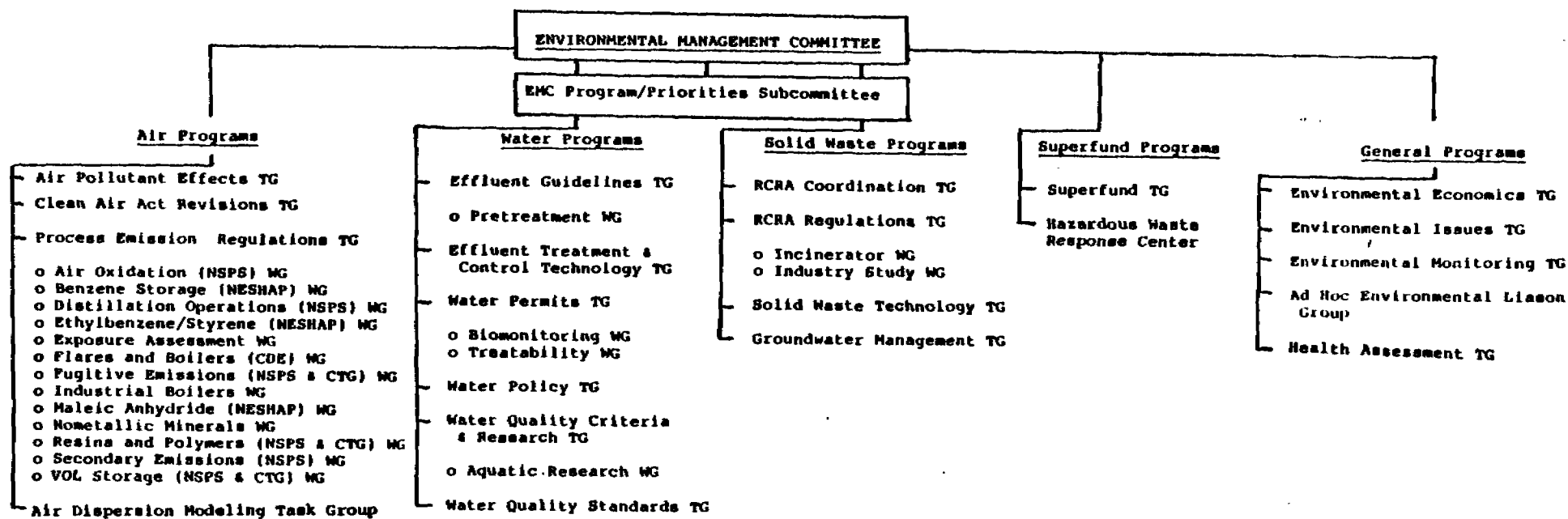
CMA 055106

ENVIRONMENTAL DIVISION--STAFF EXECUTIVE ASSIGNMENTS

David Carroll/ Alice Mayer	Janet Matey	Bob Romano	Joe Mayhew	Julie Harvey	Bill Gulledge
Environmental Management Committee	Air Pollutant Effects Task Group	Water Policy Task Group	RCRA Regulations Task Group	Groundwater Management Task Group	Environmental Monitoring Task Group
Environmental Issues Task Group	Clean Air Act Revisions Task Group	Water Permits Task Group	Solid Waste Technology Task Group	Superfund Task Group	Air Dispersion Modeling Task Group
EMC Program/Priorities (Budget) Subcommittee	Process Emission Regulations Task Group	Water Quality Standards Task Group	Solid Waste Siting and Permitting Task Group	Superfund Section 106 Work Group	Distillation Operations Work Group
Ad Hoc Environmental Liaison Group	Air Oxidation Work Group	Effluent Guidelines Task Group	Hazardous Waste Response Center Task Group	Superfund Tax Title II and Insurance Work Group (Liaison)	Secondary Emissions Work Group
	Benzene Storage Work Group	Effluent Treatment and Control Technology Task Group		Health Assessment Task Group	Fugitive Emissions Work Group
	Ethylbenzene/Styrene Work Group	Ad Hoc Biomonitoring Work Group			Benzene Fugitive Emissions Work Group
	Industrial Boilers Work Group	Ad Hoc Treatability Manual Work Group			Water Quality Criteria and Research Task Group
	Maleic Anhydride Work Group	Pretreatment Work Group			Aquatic Research Work Group
	Resins and Polymers Work Group				Environmental Economics Task Group
	VOL Storage Work Group				Incinerator Ad Hoc Work Group (RCRA)
	Flares and Boilers Work Group				Industry Studies Work Group (RCRA)
	Hazardous Air Pollutants Work Group				

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CMA 055107



TG = Task Group
WG = Work Group

October 1, 1981

CMA 055108

STAFF TRAINING AND COMMITTEE ORIENTATION PROGRAMS

CMA 055109

STAFF TRAINING AND COMMITTEE
ORIENTATION PROGRAMS

Professional Training

U. S. Chamber of Commerce Radio and TV Communications
Time Management Seminar
USDA Writing Course
Writing and Editing in the Technical and Professional Field
CMA Seminar on Meetings

Administrative Training

The Technical Secretary: Improving Professional and Management Skills

Papers Presented

EPA Best Management Practices Conference
National Association of Environmental Professionals - Hazardous
Waste Issues
Ohio Manufacturers Association - Hazardous Waste/Superfund
Water Pollution Control Association of PA - CMA Program Overview
Hazardous Waste Siting Workshop
Society for Occupational and Environmental Health, Conference on
Hazardous Waste
Manufacturing Association Seminar of Delaware Valley - Hazardous
Waste Issues
Union Carbide Corporation Public Affairs Committee - Clean Air Act

Professional Activities

Hazardous Waste Media Tours:

Augusta/Savannah, GA
San Antonio, TX
Cincinnati, OH
Greensboro/Winston-Salem/Charlotte, NC
Orlando/Tampa, FL

Radio Tape on Groundwater

Advisor: Great Lakes Rural Network Conference on Groundwater in the 80's
Advisor: 1982 Hazardous Material Spills Conference

Committee Orientation

CMA 055110

In May, we conducted a session to brief the new EMC members on all areas of Committee and staff activities. Staff presented an overview of air, water, solid waste, Superfund, and general programs and provided informational materials for future reference.

Topics covered included:

- Committee Structure and operations
- EMC Relationship to other CMA functions
- Task Group structure and functions
- EMC Special Rules of Procedure
- Research and consulting budget/contract administration
- Seminar/workshop planning
- Preparation for EMC meetings
- Major program reviews -- objectives/goals, current programs:

- Air
- Water
- Solid Waste
- Hazardous Waste Response Center
- Superfund
- General

We continue the orientation of Committee and company personnel through regular correspondence, close working relationships, and through our regular Environmental Newsletter.

CMA 055111

GOALS AND OBJECTIVES 1981-82

CMA 055112

AIR PROGRAMS

Objectives/Goals 1981-1982:

- o The Clean Air Act Revisions Task Group will actively participate in and provide technical support for an effort to achieve Clean Air Act Amendments favorable to the chemical industry.
- o The EMC will monitor and influence the development of and advocate the need to revise the national ambient air quality standard for ozone.
- o The Air Pollutant Effects Task Group will bring to a successful completion the contractor reanalysis of the data bases developed during the Houston Area Oxidants Study. We will attempt to persuade EPA to use the results in revising the national ambient air quality standard for ozone.
- o The EMC will monitor and influence the development of process emission regulations to assure they are technically reasonable and consistent with the Clean Air Act.
- o The Process Emission Regulations Task Group will effectively manage a contract to evaluate EPA's draft control technique guideline, background information document, and proposed new source performance standard for air oxidation processes.
- o The Air Dispersion Modeling Task Group will develop an advocacy program that assures a close working relationship with EPA in order to influence the development and implementation of scientifically sound and carefully validated air models.

CMA 055113

WATER PROGRAMS

Objectives/Goals 1981-1982:

- o The Water Quality Criteria and Research Task Group will continue to critique EPA's water quality criteria (both aquatic life and human health) and provide responsive comments on specific water quality criteria values. We will urge EPA to revise water quality criteria which do not have a basis in good science and provide comments to EPA regarding criteria via criteria modification.
- o CMA will continue to manage research projects on assimilative capacity of the aquatic environment for chemical compounds and verify the resultant chemical fate model.
- o CMA will comment on EPA's proposed regulations specifying how states are to use water quality criteria in developing local water quality standards. We will advocate the elimination of a pre-existing EPA policy of "presumptive applicability" of water quality criteria.
- o We will provide input to CIIT's Advisory Committee for Development of an Aquatic Toxicology Program.
- o The EMC will monitor EPA research which may impact Clean Water Act implementing regulations and offer technical advice to EPA at early stages.
- o We will work with EPA, the American Petroleum Institute and AIHC on human health aspects of water quality criteria, including risks of exposure to carcinogens.
- o The EMC will sponsor a workshop on Water Quality Criteria, Water Quality Standards and mixing zones when EPA regulations on Water Quality Standards are proposed.
- o The EMC will sponsor a workshop on EPA's best management practices (BMP) when the regulation is finalized.
- o CMA will continue to work with EPA to develop an appropriate effluent toxicity testing (biomonitoring) program. This program could help obtain water quality waivers under Section 301(g) of the Clean Water Act.
- o CMA will advocate to EPA implementation of a second round permitting strategy stressing cost effective technologies and environmental benefits of permit requirements. We will follow and influence state development of NPDES permitting regulations and identify national issues evolving from the second round permitting. CMA will recommend that EPA facilitate states running their own permit programs.

CMA 055114

- o We will distribute the CMA Policy Paper on the Clean Water Act and develop appropriate flyers and brochures.
- o The Effluent Guidelines Task Group will continue efforts to persuade EPA that the effluent limitations guidelines should not be promulgated when there are fewer than five plants in a subcategory, and will monitor EPA for assurance of realistic effluent guidelines. CMA will present the results of the five plant study to EPA and set out the significance of the study to the ultimate development of effluent guidelines.
- o We will work to revise EPA's BCT methodologies to conform to Clean Water Act requirements and the court's favorable decision.
- o The EMC will follow EPA development of new pretreatment regulations pursuant to Executive Order 12291 and work with EPA to revise the general pretreatment regulations so that they are more practical. We will work with EPA to develop practical, flexible pretreatment regulations giving more control to local publicly owned treatment works.
- o The Water Policy Task Group will actively participate and provide technical assistance during reauthorization and possible amendment of the Clean Water Act. We will also work with EPA to achieve several important administrative changes to the Clean Water Act as discussed in our Policy Paper on the Clean Water Act.

CMA 055115

SOLID WASTE PROGRAMS

Objectives/Goals 1981-1982:

- o CMA will complete the consultant project to develop a model groundwater classification scheme based on CMA's proposed groundwater policy.
- o We will conclude the contractor study to compare the factors in deciding to use landfills or incinerators to dispose of specific hazardous wastes. The Solid Waste Technology Task Group will make the study results available to the National Academy of Sciences, AIChE and appropriate regulatory agencies.
- o We will continue to negotiate with EPA on outstanding RCRA Subtitle C litigation issues in order to settle as many of the issues as possible without having to resort to litigation.
- o The RCRA Regulations Task Group will develop comments on additional RCRA proposed implementing regulations.
- o We will participate with EPA in development of repropoed RCRA Part 264 disposal standards.
- o The RCRA Regulations Task Group will review and comment on RCRA "guidance documents" as they are published.
- o CMA will maintain liaison with EPA regarding solid waste technology research and provide guidance to assure that meaningful projects are initiated.
- o The EMC will sponsor a solid waste technology workshop and information exchange.
- o CMA will cosponsor a groundwater seminar with the National Academy of Sciences and/or the Council on Environmental Quality.
- o The Groundwater Management Task Group will communicate CMA's groundwater position to member companies, trade associations, the general public and the media.

CMA 055116

SUPERFUND PROGRAMS

Objectives/Goals 1981-1982:

- o The Superfund Task Group will continue to address Superfund issues in depth and communicate our positions effectively to EPA, the states and the public.
- o CMA will comment formally to EPA on proposed regulations, presenting alternative solutions where possible.
- o The EMC will hold a seminar for member companies on Superfund implementing regulations, and EPA guidance and policy documents.

Superfund Technical Advisory Group (Hazardous Waste Response Center)

- o The Superfund Technical Advisory Group will finalize a hazardous waste site management document for member company use.
- o The Superfund Technical Advisory Group will complete drum sampling, drum consolidation and personnel safety protocols and make them available to member companies.
- o The EMC will sponsor a seminar for member companies on the protocols developed by the Superfund Technical Advisory Group.

CMA 055117

GENERAL PROGRAMS

Objectives/Goals 1981-1982:

- o We will complete the analysis and final report on the CMA/EPA five-plant study in order to demonstrate the effectiveness of biological waste treatment in removing priority pollutants. These findings and the final report will be submitted to EPA in order to impact on the direction of the effluent guideline development process for the chemical industry.
- o EMC will effectively manage its research and consulting budget, employing recently developed project management procedures in order to maximize the impact of expenditures.
- o EMC will sponsor an information exchange seminar on environmental review (audit) practices for member companies in January 1982. The seminar will be held in Atlanta, Georgia.
- o EMC will coordinate its actions with CMA's State Activities Division in order to efficiently distribute or collect case-specific information to/from organizations within the states.
- o The newly organized Health Assessment Group will develop scientific information and strategies on the subject of health effects, especially carcinogenesis of environmental pollutants at ambient concentrations of exposure found in the air, water and solid waste.
- o EMC will develop and implement a practical and effective system to manage the cross-cutting environmental issues of good science, economics, state involvement and costs/benefits.
- o EMC will foster a working relationship with EPA in its development of regulatory initiatives.
- o The Environmental Monitoring Task Group will continue to closely monitor EPA's DMR/QA program and comment as necessary.
- o EMC will follow and influence ASTM standards for chemical laboratory accreditation.

CMA 055118

STRATEGIES AND PRIORITIES
FOR
CONTACTING AND COMMUNICATING WITH EPA

- o Provide the Administrator with an overview of highest priority issues:

Air: Airborne carcinogen policy, and ozone ambient air quality standard.

Water: National pollutant discharge elimination system permitting regulations, and pretreatment requirements.

Solid Waste: Definition of solid waste, and facility standards for new versus existing facilities.

Superfund: National contingency plan, and enforcement and liability issues.

- o Provide in-depth briefings of new Assistant Administrators and Deputy Assistant Administrators on priority issues.

August 26, 1981 - briefing of Kathleen Bennett and Walt Barber on hazardous air pollutant legislative and regulatory concerns.

- o Cultivate key staff personnel and work closely with them in order to influence them and their bosses on the priority issues.
- o Establish closer day to day working relationships with the EPA staff, working on issues of concern to the chemical industry.
- o Manage task groups so that they will be prepared to assist the new administrators by developing appropriate support materials:
 - economic and technical data;
 - provide data in order to substantiate an administrative record in order to withstand judicial scrutiny; and
 - risk assessments and relevant data for regulatory impact analyses.
- o Identify individuals who would be appropriate candidates for EPA management positions should vacancies occur.
- o Assure that the tone of all written submittals to EPA is not antagonistic. Where appropriate, however, we should vigorously advocate industry positions that CMA believes should be changed or modified, or we believe should not be changed. We must also assure that an adequate administrative record is established for any of our advocacy positions in order to withstand judicial challenges by environmental activist groups.

CMA 055119

- o We should be prepared to intervene in environmentalists' judicial challenges in support of agency positions that are favorable to the chemical industry.
- o We must take strong steps to show the new EPA administration and the public the misconceptions that have grown up around the chemical industry, and correct these impressions with the true facts.

CMA 055120

BUDGET

CMA 055121

E-71

BUDGET SUMMARY

FY 1980-1981

OPERATING BUDGET

	<u>1980/81 Budget</u>	<u>1980/81 Actual</u>
Environmental & Hazardous Waste Response Center	<u>\$760,000</u>	<u>\$630,000</u>
TOTAL	<u>\$760,000</u>	<u>\$630,000</u>

LEGAL FEES & EXPENSES*

	<u>1980/81 Budget</u>	<u>1980/81 Actual</u>
Air Programs	\$248,000	\$187,000
Water Programs	280,000	184,000
Solid Waste Programs	121,000	285,000
Superfund Program	<u>80,000</u>	<u>238,000</u>
TOTAL	<u>\$729,000</u>	<u>\$894,000</u>

RESEARCH & CONSULTING BUDGET

	<u>1980/81 Budget</u>	<u>1980/81 Actual</u>
Air Programs	\$140,000	\$139,000
Water Programs	355,000	308,000
Solid Waste & Superfund Programs	50,000	130,000
General Programs	<u>75,000</u>	<u>47,000</u>
SUBTOTAL	\$620,000	\$624,000
Hazardous Waste Response Center	<u>68,000</u>	<u>- 0 -</u>
TOTAL	<u>\$688,000</u>	<u>\$624,000</u>

*Does not reflect special advocacy projects where limited impact on industry.

CMA 055122

1980-1981
RESEARCH/CONSULTING BUDGET EXPENDITURES
RESULTS

CMA 055123

AIR PROGRAMS - \$139M

SRI International - \$60M (second year of a \$140M 2-year project)

The contractor is reanalyzing the health and environmental data bases developed during the Houston Area Oxidants Study (HAOS). The objective is to persuade EPA to use the results of this study in revising the national ambient air quality standard for ozone.

Washington University - \$34M

The contractor analyzed background information for generic regulation of air oxidation processes. The findings were submitted to EPA for their consideration in new source performance standards (NSPS) and control techniques guidelines (CTG) development. The recently issued draft NSPS and CTG are favorable to the industry.

Applied Meteorology - \$30M

Applied Meteorology conducted a benzene impact analysis from ethylbenzene/styrene plants. The contractor modeled actual emissions and found that they were lower than those modeled by EPA. The study was used in hearing testimony and in CMA comments on the proposed national emissions standard for hazardous air pollutants (NESHAP) for benzene emissions from ethylbenzene/styrene plants.

University of California - \$10M

Final payment on a research project to determine if vagrant species are present in ozone generating test chambers which are used to test health effects.

Gilbert Associates - \$4M

The contractor critiqued EPA's background information document (BID) for the industrial boiler NSPS. The report was incorporated into CMA's comments to EPA. The NSPS has been delayed by at least 18 months because the BID was shown to be inaccurate.

APCA Symposium - \$1M

CMA helped sponsor an Air Pollution Control Association (APCA) symposium on health effects of sulfur oxides.

CMA 055124

WATER PROGRAMS - \$308M

North Texas State University and HydroQual - \$153M

The contractors completed the first phase of an aquatic modeling project in which a simple model was developed to predict the fate of chemicals in receiving water. Phase II will be conducted during FY82. The objective of the project is to develop a rational basis for the allocation of waste loads to the aquatic environment.

Radian Corporation and Engineering Science, Inc. - \$120M

Radian is analyzing water samples as part of a CMA/EPA program to determine pollutant removal efficiency of biological treatment. Engineering Science is compiling the final report. We expect to present the results to EPA and establish the significance of the study to the ultimate development of effluent guidelines.

Engineering Science, Inc. - \$20M

The contractor critiqued EPA's "building block" approach for developing effluent guidelines and new source performance standards for the organic chemicals and plastics and synthetics industries. The final report repudiated EPA's basic concept for developing effluent limitations guidelines. It was well received by EPA, but the impact of the report cannot be evaluated until effluent guidelines are issued.

EG&G Bionomics - \$10M

EG&G critiqued two drafts of EPA's effluent toxicity testing (bio-monitoring) strategy. Parts of this study were incorporated into CMA's comments submitted to EPA on biomonitoring. EPA is presently re-thinking the direction of effluent toxicity testing and will work with CMA to determine the appropriate role for effluent toxicity testing.

University of Tennessee and T. O. Peyton - \$2M

Experts conducted independent peer reviews of HydroQual's aquatic modeling project. As a result of these peer reviews, certain changes were made in the FY82 HydroQual contract work.

Science Research Systems - \$1M

CMA 055125

The EPA consultant who worked with the agency's multi-stage model briefed the Water Quality Criteria Task Group on current EPA modeling.

Pellston Workshop - \$2M

CMA cosponsored with EPA (5% CMA/95% EPA) a workshop on "Modeling the Fate of Chemicals in the Aquatic Environment." At this workshop the CMA funded model was subjected to peer review and was well received.

CMA 055126

SOLID WASTE AND SUPERFUND PROGRAMS - \$130M

JRB Associates - \$42M

The contractor analyzed EPA's background documents that formed the basis for listing of hazardous wastes. The objective was to determine if EPA considered all appropriate factors in listing hazardous wastes. The study concluded that EPA had generally not listed without some justification. The report is available to member companies, as it may be useful in determining whether they have justifiable cause for delisting.

Arthur D. Little - \$27M

The contractor assisted CMA's Superfund Section 105/106 Work Group to develop comments on drafts of Annexes XII, XIII and XIV to the National Contingency Plan. The comments were submitted to EPA.

Arthur D. Little - \$25M

A. D. Little assisted CMA's Superfund Section 105/106 Work Group in developing a risk assessment methodology for prioritization of inactive waste disposal sites. The report was incorporated in written comments submitted by CMA to EPA.

GeoTrans - \$12M

The consultant reviewed two EPA documents for CMA:

- 1) "Hydrologic Simulation on Solid Waste Disposal Sites" (EPA SW-868). The report, submitted to EPA, indicates that its "black box" model was subject to considerable error and inaccuracy and was improper for permit review purposes.
- 2) "Landfill and Surface Impoundment Performance Evaluation" (EPA SW-869). The review found that the document is reasonably well written, although there is some question about the applicability of capillary flow to linear lifetime.

P. E. LaMoreaux & Associates - \$10M

The major portion of this contract will be concluded in FY82. Based on CMA's proposed groundwater policy, the contractor is developing a model groundwater classification scheme and applying it to two diverse hydrogeological regions of the United States. The purpose of the project is to determine the feasibility of CMA's groundwater classification scheme.

CMA 055127

Law Engineering Testing Company - \$8M

A review of RCRA regulations found that in practice the EPA seismic criteria will not overregulate in areas where there is little concern for seismic damage. The report is an excellent document, available to member companies, that may be helpful in obtaining permits subject to seismic considerations.

Hazardous Waste Siting Conference - \$6M

CMA jointly sponsored with American Petroleum Institute, American Paper Institute, Edison Electric Institute, National Solid Waste Management Association and National Paint and Coatings Association a workshop on hazardous waste facility siting. Issues were discussed in an open forum by industry and waste disposal representatives, local legislators and community leaders.

CMA 055128

GENERAL PROGRAMS - \$47M

Booz, Allen & Hamilton - \$47M

The contractor evaluated the costs and benefits for four EPA regulatory programs:

- water quality criteria and standards,
- nonattainment/PSD,
- new source performance standards for industrial boilers, and
- RCRA incinerator and land disposal facility regulations.

The final report was incorporated in CMA's submittal to Vice President Bush's Regulatory Relief Task Force.

CMA 055129

BUDGET SUMMARY

FY 1981-1982

	<u>1981-1982 Budget</u>	<u>1981-1982 Projected Actual</u>
Air Programs	\$160,000	\$164,000
Water Programs	267,800	187,800
Solid Waste Programs	77,600	113,000
Superfund Programs	32,400	73,000
General Programs	<u>50,000</u>	<u>50,000</u>
TOTAL	<u>\$587,800</u>	<u>\$587,800</u>

CMA 055130

LONG-RANGE PLANS

CMA 055131

LONG RANGE PLANS -
A Process for Planning Future CMA
Environmental Initiatives

- I. Function of Environmental Issues Task Group - identify issues and recommend courses of action to EMC
- II. EMC Annual Retreat - review substance of program - where have been and where going
- III. EMC Annual Program Review - review of committee, task group, and work group missions, personnel, and leadership to assure most cost-effective and efficient management will occur
- IV. CMA Staff Retreats - opportunity to review management approaches and issues identification and advocacy to date and future activities
- V. CMA Staff Professional Association Participation - will increase professional qualifications and will help identify new issues that would impact the chemical industry

CMA 055132

PROBLEMS AND PROPOSED SOLUTIONS

CMA 055133

ANTICIPATED PROBLEMS

- A. Managing new emerging environmental issues with the existing issues and resulting increase in EMC task groups, task group activity and staff responsibilities.
- B. Funding of necessary research and development consultants on a wide scope of environmental issues within the limitations of CMA's budget.
- C. Determining the economic costs and benefits pursuant to regulatory impact analyses of proposed regulatory programs and CMA counter proposals.
- D. Effectively managing emerging issues such as environmental reviews, international environmental issues, tax consequences of various regulatory programs, and programs to enhance the effective use of good science in the regulatory agencies.

CMA 055134

PROPOSED RESOLUTIONS

- A. Establish priority issues to ensure that the highest chemical industry priorities have adequate resources to achieve objectives.
- Strengthen staff management systems and performance.
- Increase inter-trade association coordination.
- Work more closely with EPA staff in order to assure that only necessary and reasonable regulations evolve.
- B. Conduct EMC research and consulting budget process so that only finite issue regulatory support research is given highest priority.
- Explore alternate funding mechanisms, joint or cooperative research programs, or longer-term/high impact research.
- Establish a close liaison with EPA to monitor, evaluate and influence agency research and development.
- C. Enhance the existing economics expertise of the task groups and CMA in order to respond in a timely fashion.
- Accurately forecast emerging issues of potential significance to the industry and initiate programs to collect relevant and appropriate cost data.
- Develop timely programs to effectively input to agency programs at the formulative stages.
- Establish a member company network to cost-out CMA proposed alternatives.
- D. Manage the task group(s)--including the Environmental Issues Task Group--to identify as early as possible emerging issues and assess the impact on the chemical industry.
- Manage the EMC program so priority items are assigned to task groups or ad hoc groups as early as possible in order to influence the direction of legislative and/or regulatory initiatives.

CMA 055135

ANTICIPATED PROBLEMS

- E. Increasing our ability to influence in a positive fashion legislation and regulations before Congress or EPA establishes unsupported and/or rigid positions.
- F. Assisting the development of reasonable state legislation and regulation.
- G. Providing an advocacy role for issues having limited product impact.

CMA 055136

PROPOSED RESOLUTIONS

- E. Develop a program to quickly and reliably quantify each step of the regulatory process.

Identify the critical issues early in the legislative and regulatory process and provide technical support for responsive alternatives or rebuttal.

- F. Effectively use the new state activities program and, if necessary, EMC's ad hoc state liaison group.

Provide member company and state industry organizations with needed proposals and information.

Using the appropriate communications channels, develop the resources to effectively respond to requests for assistance at the state level.

Develop an effective communications program in which the EMC can identify state issues that may ultimately develop into national issues.

- G. EMC will identify and propose establishing Special Project panels funded by interested and/or impacted member companies to address the product specific issues.

CMA 055137

· ADDITIONAL RESOURCES REQUIRED AND PURPOSE

CMA 055138

ADDITIONAL RESOURCES REQUIRED AND PURPOSE

The past year has been a very active period for the EMC, its task groups and work groups. As a result, the Environmental Division staff has been stretched to capacity to effectively manage the existing level of EMC activities. We anticipate that the level of EMC activities will remain at a constant rate for the next year. This assumption is based on a need for industry to actively "assist" the Reagan Administration in order to implement the environmental programs in a manner most beneficial to the chemical industry. The existing level of professional staff should be adequate to handle the anticipated level of EMC activities for the next year. If, however, some new or unforeseen regulatory and legislative initiative develops, it is possible that the existing professional staff resources will not be able to manage all of these activities. Should the member companies direct that CMA address such issues, additional resources will be required.

One resource area that should be considered is the possibility of retaining services of a technical writer for the Environmental Division and/or the entire Technical Department. The need for such a person has become evident over the past year where we have to place excessive and non-cost effective reliance on outside counsels to draft technical comments and position/policy papers. As noted above, the existing professional staff spends a significant portion of their time managing numerous task groups and committees, implementing the groups' policy decisions, and carrying out the necessary administrative services. As a result, the existing professional staff is unable to draft all of the necessary technical comments, position and policy papers. In order to minimize the use of outside counsels and contractors, CMA should retain a technical writer to be responsible from start to completion of a project. This resource would result in better use of outside counsel and consultants and would result in more effective management and quality control of EMC, task group, and work group products.

CMA 055139

APPENDIX

CMA 055140

BIOGRAPHICAL NOTES

David W. Carroll, Director, Environmental Programs

Mr. Carroll received a B.S. in Economics from the University of Pennsylvania and a J.D. from the Georgetown University Law Center. Before joining CMA, Mr. Carroll was a staff attorney with the U.S. General Accounting Office from 1971-1972 and a supervisory attorney with the U.S. Environmental Protection Agency from 1972-78. Until July of this year, Mr. Carroll was CMA's Assistant General Counsel concentrating in environmental affairs. He is co-author of Federal Regulation of the Chemical Industry, published by McGraw-Hill and Vice-Chairman of the Solid and Hazardous Waste Committee of the Natural Resources Law Section of the American Bar Association.

Juliane B. Harvey, Manager, Special Environmental Issues

Ms. Harvey obtained her bachelors degree in German Literature from American University and her masters in Environmental Systems Management: Toxic Chemicals from the same university. She was an environmental supervisor for the Dupont Company, 1977-79, before coming to CMA as Project Administrator of toxicology research. She later became Manager of Solid Waste Programs for CMA, working primarily in areas related to proposed Resource Conservation and Recovery Act regulations. Presently, as Manager of Special Environmental Issues, she directs her efforts toward new legislation on waste disposal sites (Superfund) and groundwater.

Janet S. Matey, Manager, Air Programs

Ms. Matey received her bachelors degree in environmental science from Rutgers College of Agriculture and Environmental Science and her masters in environmental health science from the University of Michigan. Before joining CMA, Ms. Matey was an environmental affairs specialist with Olin Corporation, where she helped manufacturing facilities comply with federal, state and local environmental regulations. She also worked as a project engineer for Clairol, Inc. and as an environmental project director for Johnson and Johnson's Chicopee Manufacturing Company.

Alice R. Mayer, Coordinator, Environmental Programs

Ms. Mayer earned a B. A. from Earlham College. Prior to joining CMA, her experience included office management, personnel placement, committee management and program development/implementation. She worked for a property management firm, executive placement agency, and a foreign embassy. Previous experience within CMA includes work in Technical Department/ Subscribed Special Projects.

CMA 055141

Biographical Notes (continued)

Joe J. Mayhew, Manager, Solid Waste Programs

Mr. Mayhew is a graduate of the University of Texas and Southwest Texas State University. Both of his degrees are in biology. He has worked for the State of Texas as Chief Chemist for the game and fish agency and as the chief of the technical enforcement program for the state water quality agency. After leaving state government, Mr. Mayhew worked for an environmental consulting firm, Espey, Huston and Associates, where he managed a project that prepared environmental impact statements.

Robert R. Romano, Manager, Water Programs

Dr. Romano's background includes an M.S. in Aquatic Biology and an M.S. in Environmental Science-Water Quality, both from the University of Michigan. He earned a Ph.D. in Environmental Health Sciences-Water Quality from Purdue University in 1976. He came to CMA from the U.S. Nuclear Regulatory Commission where his most recent position in the Environmental Specialist Branch of the Division of Site Safety and Environmental Analysis involved review of water quality issues in relation to licensing of nuclear power stations.

CMA 055142

F

CMA 055143

HEALTH, SAFETY AND
CHEMICAL REGULATIONS

SECTION

F

CMA 055144

REPORT ON THE ACTIVITIES OF THE
HEALTH, SAFETY AND CHEMICAL REGULATIONS DIVISION

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CMA 055145

* Research and Consulting Budget summaries are included
in the separate Committee Achievement Reports.

CHEMICAL MANUFACTURERS ASSOCIATION
HEALTH, SAFETY AND CHEMICAL REGULATIONS DIVISION
SUMMARY OF DIVISION ACTIVITIES

Because the Health, Safety and Chemical Regulations Division has four committees, executive summaries for each are provided with their reports. Those reports reflect a persistent drive toward regulatory reform. They endorse good science, cost-effectiveness, risk assessment, and performance standards as the guidelines for sound legislation and regulation.

In 1981, the Reagan Administration turned to industry, and to a great extent to the chemical industry, for assistance. CMA's Board of Directors has pledged our support.

At the request of Vice President Bush, the division's committees joined others in CMA to define plans for effective regulatory reform as that reform might affect our industry. In separate special reports, and frank discussions, those plans were relayed to the regulatory agencies, the Office of Management and Budget and to congressional staff.

Uniquely, the Reagan Administration has called not only for opinions but for scientific defensible proofs -- legal, economic and technical. Through concerted committee and staff efforts, CMA has drawn other associations and public interest groups into the search for solutions and the development of support documents. Each step toward reformation has been challenged by those who see their vested interest threatened. Consequently, the division's Public Risk Analysis Special Committee -- chartered by CMA's Board of Directors in October 1980 -- is consolidating CMA's economic impact and risk assessment resources to strengthen analyses underlying its comments and position papers.

During the past year, the regulatory agencies' needs for greater specificity, more elaborate research, shorter response time and increased numbers of conferences have also increased committee, staff, and consultant workloads.

The Health, Safety and Chemical Regulations Division directly supports the association's Chemical Regulations and Occupational Safety and Health Programs. The fourteen staff currently assigned and authorized support activities of two standing committees, two special committees and forty-four supporting task groups. Support requirements for these groups increased substantially during the past year, especially for both special committees.

CHEMICAL REGULATIONS ADVISORY COMMITTEE (CRAC):

During the past year CRAC has expanded its scope of activities, increased its task group memberships and experienced an increasing level of meetings with agencies (especially EPA). In the future, increased interface with OMB and more in-house library research and comment drafting will be necessary to advocate effectively industry positions and to limit outside research and consulting expenses.

OCCUPATIONAL SAFETY AND HEALTH COMMITTEE (OSHC):

Despite a reduction in OSHC task groups, CMA support needs actually increased during the past year because of efforts to intensify contacts with federal agencies that regulate or influence regulation of health issues: specifically, the Occupational Safety and Health Administration, the Interagency Regulatory Liaison Group, and the National Institutes of Occupational Safety and Health.

HAZARDS COMMUNICATIONS SPECIAL COMMITTEE (HCSC):

By consolidating all labeling activities under this committee CMA enhanced its effectiveness in dealing with EPA and OSHA on labeling issues. At the same time requirements for CMA support increased and the efforts of the full-time staff executive have been augmented part-time by the other staff executives.

PUBLIC RISK ANALYSIS SPECIAL COMMITTEE (PRASC):

It is expected that the committee's activity will grow considerably during the next few years as risk/cost/benefit studies are required for new federal regulations. Consequently, two full-time staff executives and a secretary will be needed to support the division's work load.

GENERAL EXPENSES

An increase in the personnel complement of three staff, i.e., two staff executives and a secretary to support the two newly created special committees and to help support existing task groups was authorized in FY 81/82. Expenses related to this increase in staff, e.g., travel and staff training, also increased. The Division closed out the year with \$127 remaining in its internal operations budget. Additionally, the staff conducted several research and consulting projects in-house for which \$124M had been budgeted.

CMA 055147

INTRODUCTION

CMA's committees, staff and members identify many potential issues of concern to the chemical industry. Usually, those issues are spawned by proposed regulatory or legislative actions that would directly affect a large number of companies, or that could indirectly affect our industry by establishing a general precedent. Such issues are considered by CMA's committees, and when appropriate, CMA, through its committee systems, builds an industry consensus and presents it to the legislature, the regulatory agencies, the executive department or to the courts. Normally, those positions have been viewed as adversarial by those outside our industry. Nevertheless, such polarized positions were necessary to gain any solution acceptable to the industry.

The Reagan Administration, however, has new methods and different needs. The administration and the agencies have asked industry to identify rules and legislation that adversely impact the industry or offer minor improvements at too great a cost, and to propose changes where needed. The administration has given industry the opportunity to state its concerns, but also a requirement to prove they are valid. Additionally, the administration and the agencies are willing to champion our cause, if we are willing and able to propose solutions that carry public support. The Health, Safety and Chemical Regulations Division and its four committees have accepted the challenge and defined new strategies and tactics for effectively implementing both the Occupational Safety and Health Act (OSHA) and the Toxic Substances Control Act (TSCA) -- the two acts of primary interest to the division.

CMA 055148

STRUCTURE AND MANAGEMENT OF THE HEALTH, SAFETY AND CHEMICAL REGULATIONS DIVISION

The division directly supports the activities of two standing committees and two special committees -- the Chemical Regulations Advisory Committee, the Occupational Safety and Health Committee, the Public Risk Analysis Special Committee, and the Hazards Communications Special Committee. Those activities are focused on effective implementation, and if necessary modification, of two acts -- the Toxic Substances Control Act (TSCA) and the Occupational Safety and Health Act (OSHA). Secondly, many other acts, foreign laws and international agreements are evaluated and dealt with by the committees when those laws and agreements affect implementation of either TSCA or OSHA. Dealing with peripheral legislation, foreign and domestic, is particularly necessary to effectively implement TSCA, because it was designed to tie together or to fill gaps between other health and environmental laws. Consequently, the overlap of activities and need for information exchange pose unique resource management challenges.

Staffing requirements for a committee change almost daily depending on: the number of issues being handled by a committee; the scope, detail and longevity of those issues; and deadlines for completed work products. To effectively handle peak workloads, the division's staff are organized as teams -- normally one or more of the division's staff executives and a secretary (See figure 1) who act as project leaders. The team handling a project augments its resources as necessary by temporarily incorporating other teams and specialists from within CMA. The system successfully accommodates peak workloads, provides valuable cross-training and sharpens the associate director's organizational management skills.

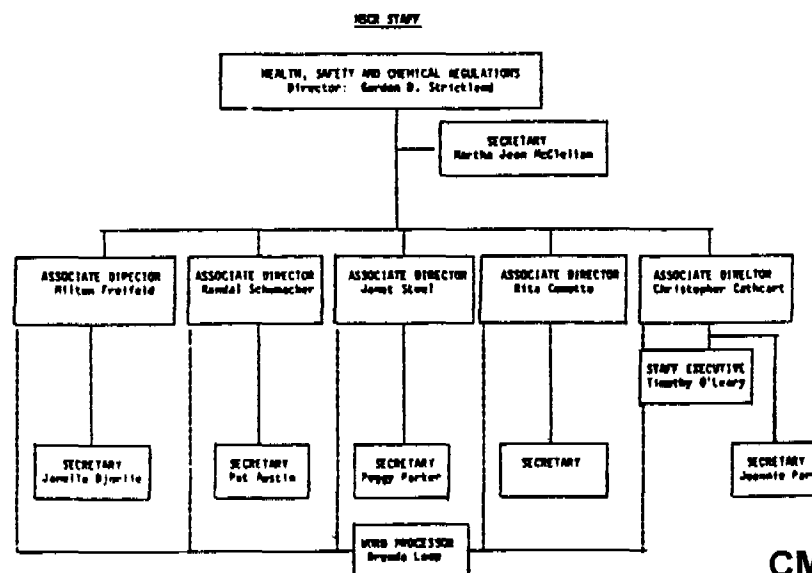


Fig. 1

CMA 055149

Division staff executives have been selectively recruited to combine diverse academic, government, and industry knowledge and expertise that match one or more elements of the division's activity profile (See Figure 2). To maintain continuity with committee and task group members, and to assure program accountability, one staff executive is assigned to each committee, task group or work group. That staff executive is singularly responsible to the group and to CMA for coordinating the group's activities. Additionally, associate directors who staff the full committees are responsible for integrating activities of task groups and work groups subordinate to those committees. Staff assignments are shown in the section on committee achievements.

HEALTH, SAFETY AND CHEMICAL REGULATIONS DIVISION ACTIVITIES PROFILE

OCCUPATIONAL HEALTH & SAFETY

- Control of Workplace hazards
 - identification & communications
 - control technology
 - ergonomics & stress
 - reproductive hazards
- Records & Access
 - medical & safety
 - OIIRs
- Standards Development
 - health (cancer policy & exposure control)
 - safety
 - ANSI
 - equipment & life support systems
 - genetic engineering
- Education of Physicians & Workers
 - occupational health
 - industrial hygiene
 - fire and safety

CHEMICAL PRODUCT REGULATIONS

- Cost-Risk-Benefit Analyses
 - economic impact analysis
 - questionnaire development
 - model development
- Testing Standards & Programs
 - methods
 - protocols
 - programs (EPA, ITC, NTP, OECD, EEC 6th)
 - screening systems
- Chemical Effects
 - data based information systems
 - data retrieval & repository
- Records, Reports, Notices & Inventories
 - premanufacture
 - SNURs
 - imports & exports
 - testing data
 - health & safety studies
 - significant adverse reactions
 - imminent hazards

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Fig. 2

F-5

CMA 055150

STAFF TRAINING AND COMMITTEE ORIENTATION

Good communications, effective committee action and time management have been the focus of the division's staff training programs. Two of the division's executives completed the U.S. Chamber of Commerce's media training course; one completed the first year Institute for Organizational Management, and all were trained in effective committee management, coalition management, negotiations and information gathering. Staff executive and support staff training was augmented with classes and individual tutoring on: effective writing, conflict management, stress management, time management, data maintenance and telephone communications.

Soon after they assumed their chairs, each newly appointed committee and task group chairman was briefed on CMA policies and objectives and on CMA's operations systems. Additionally, briefing packages were developed and given to committee and task group members to aid them in their deliberations and in understanding how CMA works.

CMA 055151

COMMITTEE ACHIEVEMENTS

REPORT
OF THE
CHEMICAL REGULATIONS ADVISORY COMMITTEE
1980-1981

CMA 055153

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CMA 055154

EXECUTIVE SUMMARY

CMA 055155

CHEMICAL REGULATIONS ADVISORY COMMITTEE
EXECUTIVE SUMMARY OF ACTIVITIES

INTRODUCTION

The Toxic Substances Control Act ("TSCA" or the "Act") was signed into law on October 11, 1976, and became effective on January 1, 1977. A complex and detailed statute, TSCA empowers the Environmental Protection Agency ("EPA" or the "Agency") to evaluate and, if necessary, regulate the effects of chemical substances and mixtures on human health and the environment.

TSCA's coverage is comprehensive. It potentially applies to all chemicals manufactured, processed, distributed or used in the United States except where these chemicals are already regulated under certain other federal laws. TSCA thus affects not only the chemical industry, but the many industries that use its products. TSCA is, therefore, the primary act of concern to the Chemical Regulations Advisory Committee (CRAC).

Because TSCA has had a direct and substantial impact on the chemical industry, CRAC has made a concerted effort to express its members' views on EPA's actions under the Act, and has used a variety of formal and informal channels to communicate with the Agency, including the submission of extensive written comments on EPA's proposed regulations.

CRAC's efforts have been effective. While the Agency has developed and articulated a regulatory approach under each of TSCA's principal provisions, very few EPA proposals have been issued as final rules and no irreversible policies have been adopted. Additionally, EPA's new leadership is taking a fresh look at the Agency's policies under TSCA and intends to alter the Agency's course wherever a change is warranted.

CMA has criticized several EPA proposals published during the last administration and awaiting final action. EPA's new leadership has reviewed CMA's comments and is re-examining those proposed rules. To aid EPA in that review CRAC published a 339-page book, "The First Four Years of TSCA." The book describes major provisions of TSCA, summarizes and references over 3000 pages of formal CMA comments on EPA's proposed rules and highlights the following nine guidelines to better implementation of the Act.

- EPA's regulatory requirements should be well within the limits of its statutory authority and clearly necessary to achieve the purposes of TSCA.

CMA 055156

- EPA should place less reliance on formal legalistic requirements and instead emphasize voluntary action and informal negotiation to achieve TSCA's objectives.
- EPA must be more sensitive to the impact of TSCA's requirements on innovation in the chemical industry and must make greater efforts to evaluate the economic impact of its proposals.
- EPA should seek information only when it is needed to further specific and defined regulatory objectives, and should not demand the collection and submission of large amounts of information for its own sake.
- EPA must recognize the limited resources that industry is capable of devoting to the goals of TSCA without placing overwhelming burdens on particular products and operations.
- EPA's proposals should avoid stifling flexibility and inhibiting scientific judgement.
- EPA must make a greater effort to recognize the legal and commercial necessity of protecting confidential business information.
- EPA should take regulatory action under TSCA only after adequate data are gathered and only on the basis of scientifically defensible decisions that have been subject to peer review.
- EPA must recognize that the various provisions of TSCA do not stand alone, but interact with and mutually support each other, necessitating an integrated approach to the Act's implementation.

In addition to the above guidelines, CMA developed and presented a major regulatory reform package to Vice President Bush and his counsel, the Secretary of Commerce, the Office of Management and Budget, the Regulatory Relief Task Group, and the regulatory agencies. Together, the publications are a detailed roadmap to resolving priority concerns of our industry and to promulgating reasonable, cost-effective regulations that embody the original intent of Congress.

During the past year CRAC has continued to expand its influence within the government and the private sector and consequently to require more support from its members and its staff.

CMA 055157

MAJOR ACCOMPLISHMENTS

CRAC has been able to achieve a high level of performance in regulatory and legislative activities, and has expanded its community, public relations and committee orientation functions by using representatives from member companies, outside legal counsel, outside consulting firms and CMA staff. Under its present task group structure, CRAC was able to address major EPA proposed or final rules under Sections 4, 5, 8 and 12 of TSCA. In addition, CRAC testified before Congress on the implementation of TSCA and was successful in preventing potentially troublesome amendments to TSCA. Communication with CMA members, EPA, Congress and the public remains an essential component on CRAC's program, which it has sought to expand through newsletters and other publications, informational meetings and meetings scheduled to discuss a specific topic. CRAC has also sought to define its objectives and to involve each committee member on specific task group projects.

Development of CMA comments on major rule proposals and studying the economic impact of TSCA rules on the chemical industry account for most of the budgeted funds spent during this past year. In order to maintain its high level of performance during 1981-1982, CRAC will continue to rely upon outside legal counsel and consulting firms for issues needing special expertise. As many proposed regulations reach final form under the new EPA Administration, environmentalist groups may litigate rules for which they believe EPA has not provided adequate support. CRAC will need to document its positions on TSCA proposals and to enter the courts where favorable final regulations are challenged or where final rules are unreasonable and pose substantial burdens.

Some major accomplishments made during the past year include:

- Testified before the House Commerce, Tourism and Transportation Subcommittee on EPA's progress toward the implementation of TSCA.
- Worked with key congressional staff to augment written CMA comments and positions by outlining and advocating CMA positions on EPA initiatives.
- Commented informally on a congressional subcommittee proposal which would request the Office of Technology Assessment to conduct a study examining the adequacy of test data that the chemical industry has historically submitted with PMNs.

CMA 055158

- Briefed key individuals within EPA and OMB on priority regulatory issues facing the chemical industry under TSCA and through international agreements.
- Conducted an economic impact analysis of EPA's proposed premanufacture notification (PMN) requirements under Section 5 of TSCA.
- Petitioned EPA requesting that the Agency commence rulemaking and to exempt certain low-volume chemicals, site-limited intermediates and polymers from PMN requirements under Section 5(h)(4) of TSCA.
- Informed the Department of State of the proposed OECD Decision adopting minimum premarket data (MPD) requirements -- i.e., testing -- for all new chemicals.
- Submitted a petition to EPA requesting that the Agency modify its final export notification rule promulgated under Section 12(b) of TSCA.
- Prepared, in coordination with other CMA departments, a detailed regulatory reform package to the President's Task Force on Regulatory Relief, highlighting major regulations under TSCA needing immediate attention.
- Drafted a policy paper on the Chemical Substances Information System used by government agencies to store and retrieve information used in regulatory decision-making.
- Reviewed and commented on test protocols being developed by EPA under Section 4 of TSCA and by OECD.
- Completed the NERA pilot study examining the methodology used to measure the overall economic impact of TSCA on the chemical industry.
- Held quarterly Informational Meetings to keep member company representatives fully apprised of positions developed by CRAC on regulatory proposals, the origins of those positions, and the anticipated effect they would have on company operations.
- Published periodic Toxic Substances Newsletters which were sent to the designated TSCA contact of each member company.

CMA 055159

Communicated CMA positions on major regulatory issues to the media.

- Worked with other trade associations representing the chemical industry to develop a uniform industry position on regulatory proposals having broad impacts.
- Met or talked with various "public interest groups" having an interest in toxic chemicals in general, or CMA positions on specific TSCA regulations in particular, to more fully appreciate their interests and concerns, and in turn, to detail CMA's position to ensure they completely understood it and its supporting rationale.
- Provided input for CMA's Communications Department through articles related to TSCA that were published in CMA News, ChemEcology, and other CMA promotional material.
- Distributed to EPA members of the trade press, universities, public interest groups, and law schools, copies of CMA's primer, The First Four Years of TSCA.
- Briefed each new CRAC member on CMA procedures and policies, and on past and current activities of the committee.
- Prepared a CRAC Procedures Book which contains rules of procedure, charters of CRAC and its task groups, and the objectives and strategies for the committee.
- Held a planning meeting for CRAC members and CMA staff to determine what its long-term objectives should be and what strategies should be employed to meet those objectives in a timely manner.

MEMBER COMPANY PERSONNEL

The level of company participation under CRAC this past year is comparable to that measured last year, with a slight increase in the number of companies involved but with a reduction in the total amount of time spent attending CMA meetings. Figures show that 67 CMA member companies participated in various CRAC activities, compiling a total of 3.50 years of direct support through meetings attendance alone. CRAC's activities were supported by 214 company representatives who are members on the committee and its subordinate task groups and work groups. CRAC was able to maintain a high level of

performance by distributing the work load among a greater number of companies, and through efforts to make meetings more productive by insisting on an early meeting agenda, asking company representatives to adequately prepare by obtaining company views on draft comments and company support information prior to meetings, and using written and electronic means of communication to enhance operational efficiency.

CMA STAFF SUPPORT

Presently, two staff executives from the Technical Department are assigned to CRAC full-time while four others provide support to varying degrees part-time. In addition, both the Legal Department and Government Relations Department, have assigned staff to work with CRAC on issues needing their expertise. Administrative and public relations support staff add significantly to the smooth functioning of the committee.

For 1981-82, the level of staff support is expected to remain constant. Peak work loads will be distributed among staff executives assigned to CRAC to ensure constant efficient operation.

CMA 055161

COMMITTEE STRUCTURE

CMA 055162

CHEMICAL REGULATIONS ADVISORY COMMITTEE

TERM ENDING MAY 31, 1982

F. E. Bentley
Dean E. Leib
A. B. Lindquist
Robert Polack
Carl W. Umland

Texaco Chemical Company
Rohm and Haas Company
Stauffer Chemical Company
Reilly Tar & Chemical Corporation
Exxon Chemical Americas

TERM ENDING MAY 31, 1983

George Y. Brokaw
Bruce H. Brubaker
E. Hamilton Hurst
J. P. McCarthy
Thomas W. Mooney

Tennessee Eastman Company
Diamond Shamrock Corporation
Nalco Chemical Company
Koppers Company, Inc.
Procter & Gamble Company

TERM ENDING MAY 31, 1984

Earl G. DeWitt
Fred D. Hoerger
Harold K. Latourette
Barbara J. Price
Curtis W. Smith

Ethyl Corporation
Dow Chemical U.S.A.
FMC Corporation
Phillips Petroleum Company
Shell Chemical Company

CMA 055163

CHEMICAL REGULATIONS ADVISORY COMMITTEE

Charter

Mission

The mission of the Chemical Regulations Advisory Committee (CRAC) is, in relation to the Toxic Substances Control Act, to accomplish the following:

1. Alert the Board of Directors of CMA to all regulatory and legislative matters related to TSCA that may significantly affect the U.S. Chemical Industry.
2. Formulate and advocate positions on behalf of CMA member companies regarding regulatory and legislative issues related to TSCA.
3. Coordinate these activities with other CMA Standing Committees when overlapping issues are involved so that, to the extent appropriate, uniform positions are developed and presented.
4. Communicate such positions, as appropriate, within the CMA member companies, within the chemical and related industries, with other trade associations, with appropriate federal government bodies, and with other relevant groups including professional organizations, foreign governments, state and local governments, etc.
5. Coordinate use of available resources to achieve regulatory and legislative positions favorable to the chemical industry.

Charter

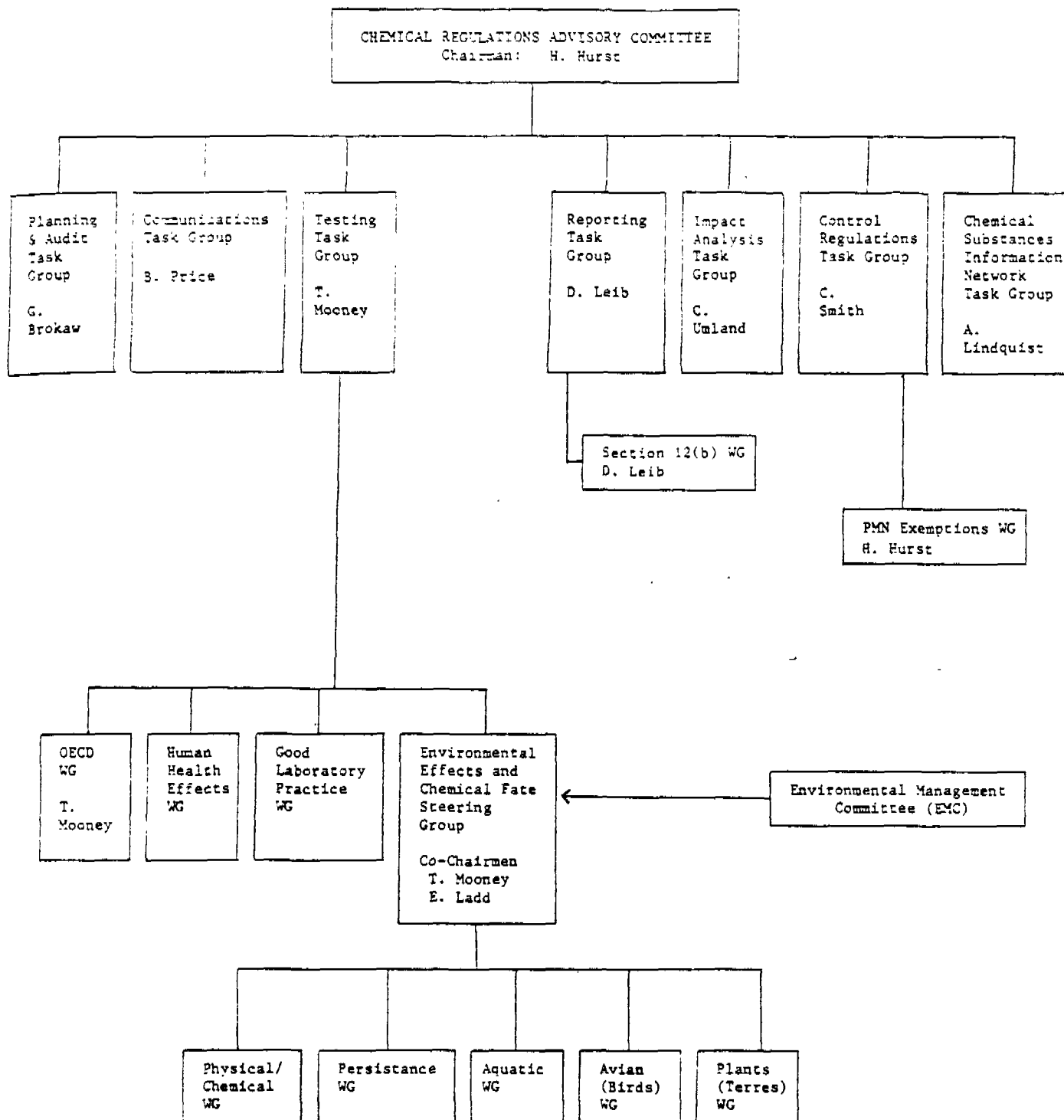
The CMA Chemical Regulations Advisory Committee will consist of fifteen members representing cross-sectional concerns of the CMA membership. Members will be appointed and approved by CMA Board of Directors to serve for three years, five of whom are rotated from CRAC membership and replaced by representatives from different CMA member companies each fiscal year. As indicated in the "Rules of Procedure for CRAC and its Task Groups", CRAC shall accomplish its mission and objectives within the Committee and through its Task Groups. The Task Groups shall be appropriately selected and staffed and each will operate according to a CRAC approved charter that states the group's mission, charter and objectives.

CRAC shall meet only as often as necessary to accomplish its activities. To the extent practicable and in the absence of cogent reasons for being held elsewhere, all committee and task group meetings shall be held in Washington, D.C., preferably at CMA. Meetings shall be attended at all times by appropriate staff members of the CMA. The charter for CRAC, and any changes therein, must be approved by the CMA Board of Directors.

Objective

Promote reasonable regulations to allow implementation of TSCA in a timely manner.

CMA 055164



R. Schumacher/mjm
9/29/81

CMA 055165

COMMITTEE AND TASK GROUPS SUMMARY CHARTER

Chemical Regulations Advisory Committee: Advises the Board of Directors and formulates and advocates chemical industry positions regarding legislative and regulatory developments pertaining to testing and regulatory control of chemicals at the point of manufacture.

B: June 5, 1979 (Reconstituted)

Chairman: Hamilton Hurst

D: May 1982

M: 15

Staff Executive: Randal P. Schumacher

Chemical Substances Information Network Task Group: Monitors development of CSIN, evaluates CSIN components and their importance to TSCA regulatory matters, and works to ensure the high quality of data contained in information systems.

B: May 13, 1980

Chairman: A. B. Lindquist

D: May 1982

M: 14

Staff Executive: Janet Ann Steel

Communications Task Group: Disseminates news on CRAC activities and industry consensus positions, organizes quarterly informational meetings and drafts articles for publication in CMA News and CRAC's Toxic Substances Newsletter.

B: June 5, 1979 (Reconstituted)

Chairman: Barbara Price

D: May 1982

M: 3

Staff Executive: Janet Ann Steel

Control Regulations Task Group: Guides EPA in developing rational regulations under Sections 5 and 6 of TSCA, develops formal CMA comments on EPA rules under those sections of TSCA.

B: February 21, 1980 (Reconstituted)

Chairman: Curtis Smith

D: May 1982

M: 57

Staff Executive: Randal P. Schumacher

PMN Exemption Work Group: Develops criteria for exempting low-risk chemicals from PMN reporting requirements under Section 5(h)(4) of TSCA.

B: March 10, 1981

Chairman: Hamilton Hurst

D: May 1982

M: 5

Staff Executive: Randal P. Schumacher

Impact Analysis Task Group: Analyzes potential impacts of TSCA regulations on the chemical industry that might inhibit technological innovation or deny societal benefits unnecessarily.

B: July 15, 1981 (Reconstituted)

Chairman: Carl Umland

D: May 1982

M: 17

Staff Executive: D. Christopher Cathcart

Planning & Audit Task Group: Assesses methods and compliance of CRAC task groups with assigned goals and annually reports activities and effectiveness of the committee and its task groups in carrying out CMA policies and requirements. The work product is incorporated into CMA's annual audit report and the CRAC chairman's report to the Board of Directors.

B: June 5, 1979

Chairman: George Brokaw

D: May 1982

M: 3

Staff Executive: Randal P. Schumacher

Reporting Task Group: Guides EPA in developing rational and effective regulations under Section 8 of TSCA; develops formal CMA comments on reporting and retention of records.

B: June 5, 1979

Chairman: Dean Leib

D: May 1982

M: 11

Staff Executive: Janet Ann Steel

Section 12(b) Work Group: Develops regulatory alternatives to the final TSCA Section 12(b) export rule; reviews technical and legal issues for formal CMA comment.

B: March 10, 1981

Chairman: Dean Leib

D: May 1982

M: 5

Staff Executive: Janet Ann Steel

Testing Task Group: Guides EPA's rational development of testing rules, standards, guidelines and good laboratory practices under Section 4 of TSCA; develops formal CMA comments on EPA rules.

B: June 5, 1979

Chairman: Thomas Mooney

D: May 1982

M: 13

Staff Executive: Janet Ann Steel

Environmental Effects Steering Group: Drafts CMA comments on environmental effects standards promulgated under Section 4 of TSCA.

B: June 5, 1979

Chairmen: Thomas Mooney/Ernie Ladd

D: May 1982

M: 21

Staff Executive: Janet Ann Steel

Health Effects and GLPs Work Groups: Analyze EPA rules and draft rules, and prepare formal and informal CMA comments on Health Effects Standards promulgated under §4 of TSCA.

B: June 5, 1979

Chairman: Thomas Mooney

D: May 1982

M: 60

Staff Executive: Janet Ann Steel

OECD Work Group: Oversees the activities of this international body and how they impact U.S. chemical regulatory developments.

B: March 3, 1981

Chairman: Thomas Mooney

D: May 1982

M: 6

Staff Executive: Janet Ann Steel

CMA 055166

B = Beginning Date

D = Sunset Date

M = Members

Gordon D. Strickland/bal

10/01/81

RESOURCES

CMA 055167

CHEMICAL REGULATIONS ADVISORY COMMITTEE

Member Company Resources
(includes Task Groups and Work Groups)

Company (67 total)	Number People	Total Meeting days
Allied Corporation	7	25
American Cyanamid	7	19
Amoco Chemical Co.	3	26
ARCO Chemical Co.	8	24
Ashland Chemical Co.	1	10
BASF Wyandotte Corporation	2	3
J. T. Baker Chemical Company	1	1
Borden, Incorporated	2	2
Cabot Corporation (Parent Co. of Kawecki Berylco)	1	1
Celanese Corporation	9	38
Ciba-Geigy Corporation	2	8
Cincinnati Milacron, Incorporated	1	1
Cities Services Company	1	4
Conoco Incorporated	2	2
Cosden Oil & Chemical Company	1	1
Dart Industries, Incorporated	1	8
Diamond Shamrock Corporation	4	23
Dow Corning Corporation	1	1
The Dow Chemical Company	14	38
E. I. du Pont de Nemours & Company	10	74
Eastman Kodak Company	6	31
El Paso Products Company	1	1
Eli Lilly & Company	1	10
Engelhard Minerals & Chemical Corp.	1	1
Ethyl Corporation	2	3
Exxon Chemical Americas	5	41
FMC Corporation	5	29
GAF Corporation	2	2
General Electric Company	1	1
W. R. Grace & Company	1	2
Hercules Incorporated.	2	2
Hooker Chemical Company	1	1
ICI Americas, Incorporated	9	33
IMC Chemical Group, Incorporated	1	1
Koppers Company, Incorporated	5	44
The Lubrizol Corporation	1	1
JM Company	7	15
Mallinckrodt, Incorporated	1	4
Merck & Company, Incorporated	2	3
Mobay Chemical Corporation	1	1
Mobil Chemical Company	3	14
Monsanto Company	10	50
Nalco Chemical Company	2	24
NL Industries, Incorporated	1	1
Olin Corporation	6	21
Owens-Corning Fiberglass Corporation	2	2
Pennwalt Corporation	1	1
Petrolite Corporation	2	2
Pfizer Incorporated	1	3
Phillips Petroleum Company	2	2
PPG Industries, Incorporated	2	3
The PQ Corporation	2	5
The Procter & Gamble Company	6	41
Reilly Tar & Chemical Corporation	1	3
Rhone-Poulenc Incorporated	1	1
Rohm & Haas Company	6	42
Rutgers-Newse Chemical Company	1	2
Shell Chemical Company	10	55
Stauffer Chemical Company	4	38
Stepan Chemical Company	1	3
Sun Petroleum Company	1	10
Tenneco Chemicals, Incorporated	1	2
Texaco Chemical Company	1	11
Union Carbide Corporation	7	29
Uniroyal Chemical Company	2	7
U. S. Borax Corporation	2	2
Virginia Chemicals Incorporated	3	24
Totals	214	937

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(Member Company Resources)

While a precise compilation of all company support provided CRAC cannot be made, the figures indicate that member companies have assigned a high priority to CMA activities under CRAC, and have allocated sufficient resources in the past fiscal year. The table above shows that 67 CMA companies participated in various CRAC activities, compiling a total of 3.50 years of direct support through meetings attendance alone. CRAC's activities were supported by 214 company representatives who are members on the committee and its subordinate task groups and work groups. These figures do not reflect company attendance at the quarterly CRAC Informational Meetings, which average slightly over 100 people each meeting, nor do they include time spent in attending intracompany meetings, preparing draft position papers and comments, researching an issue, traveling, or using company administrative staff. The additional time spent outside CMA meetings by company representatives and their staff could easily increase the total figures three times.

The level of company participation under CRAC this past year is comparable to that measured last year, with a slight increase in the number of companies involved but with a reduction in the total amount of time spent attending CMA meetings. During the past fiscal year, EPA activity increased as evidenced by published proposed or final rules under Sections 4, 5, 8, and 12 of TSCA. CRAC was able to maintain a high level of performance by distributing the work load among a greater number of companies, and through efforts to make meetings more productive by insisting on an early meeting agenda, asking company representatives to adequately prepare by obtaining company views on draft comments and company support information prior to meetings, and using written and electronic means of communication to enhance operational efficiency.

For fiscal year 1981-82, CRAC foresees an urgent need to increase the level of company involvement in its programs that are designed to put TSCA provisions into effect in a timely and reasonable manner. More individual company documentation justifying CRAC positions on key issues will be needed, if the committees's objectives are to be met. In the case of measuring cost effectiveness, companies will need to examine their operations to document which regulatory alternative will accomplish the intended purpose of TSCA with the least economic impact. Therefore, while total company representation and time spent in CMA meetings is expected to remain at approximately the same level, time spent by company representatives and their staff on CRAC activities at home is expected to rise if the chemical industry hopes to successfully set the regulatory pattern under TSCA in years to come.

CMA 055169

COMMITTEE ACHIEVEMENTS

CMA 055170

CHEMICAL REGULATIONS ADVISORY COMMITTEE

Achievements 1980-81

Committee achievements in each of the following categories are listed in order of their significance to the chemical industry. .

Legislative:

CMA prevented potentially troublesome amendments to TSCA by working with key Congressmen, their staff, environmentalist groups and industry trade associations prior to and during reauthorization hearings in April-May, 1981. Several amendments to TSCA that were under active consideration during reauthorization hearings would have imposed greater controls on handling PCBs, increased funding to state toxics programs, initiated a major study examining the adequacy of test data submitted with PMNs, and required EPA to promulgate product labeling rules. Any proposed amendments to the Act could have laid it open to major revision, the result of which could have been the imposition of more and stricter requirements.

Specifically, members of the Chemical Regulations Advisory Committee and its staff:

- Testified before the House Commerce, Tourism and Transportation Subcommittee on EPA's progress towards the implementation of TSCA. While EPA's TSCA performance was being scrutinized during reauthorization hearings, CMA reviewed EPA's accomplishments and industry's initiatives that are in accord with the spirit of TSCA -- e.g., creation of new testing facilities, risk assessment of new chemicals prior to manufacture and improvement of company recordkeeping and reporting systems. CMA testified that although many of EPA's proposed regulations were beyond the intent of Congress and would not achieve their stated purpose, CMA stood ready to work with the Agency to achieve reasonable regulations to resolve actual needs and problems.
- Worked with key congressional staff to augment written CMA comments and positions by outlining and advocating CMA positions on EPA initiatives. Through a growing working rapport with the congressional staff, CMA has been effective in providing immediate responses to specific questions and concerns raised by congressional committees having jurisdiction over TSCA. The information provided has reinforced the credibility of positions taken by CMA and has enhanced CMA's overall effectiveness with the committees.

CMA 055171

- Commented informally on a congressional subcommittee proposal which would request the Office of Technology Assessment to conduct a study examining the adequacy of test data that the chemical industry has historically submitted with PMNs. CMA expressed reservation about the validity of the results that such a study would have, based on the qualifications of the researchers, and the methods proposed to be employed. Although the study has not yet been commissioned, it could have far-reaching consequences toward imposing premanufacture testing requirements on new chemicals.

Regulatory:

In addition to its legislative activities, CRAC and its staff:

- Briefed key individuals within EPA, and OMB, on priority regulatory issues facing the chemical industry under TSCA and through international agreements. These discussions gave newly-appointed government personnel a clear understanding of what issues needed first attention, the action needed to be taken, and justification for the action.
- Conducted an economic impact analysis of EPA's proposed premanufacture notification (PMN) requirements under Section 5 of TSCA. By asking companies that had submitted PMNs to complete a questionnaire on costs associated with filing PMNs. CMA was able to measure both direct and indirect costs, and to project what impact these costs might have on innovation within the chemical industry. In addition to supporting CMA's contention that EPA's proposed PMN rule and accompanying PMN form were unreasonable, the study served as a basis from which CMA could seek regulatory relief from PMN requirements through PMN exemptions.
- Petitioned EPA requesting that the Agency commence rule-making and to exempt certain low-volume chemicals, site-limited intermediates and polymers from PMN requirements under Section 5(h)(4) of TSCA. CMA also requested an abbreviated PMN review period for chemicals on which EPA does not intend to take regulatory action. If EPA were to adopt CMA's proposal, more than half of the PMNs currently being submitted to the Agency would be eligible for exemptions, potentially saving companies an average \$20,000 per PMN.¹

CMA 055172

¹ Regulatory Research Service, A Critique of the EPA "Economic Impact Analysis of Proposed Section 5 Notice Requirements", IV - 47 (March 16, 1981).

While further work to obtain PMN exemptions will be required, the CMA proposal, which was documented with company data, has been accepted in concept by EPA and by Vice President Bush's Task Group on Regulatory Reform. The Agency has stated it intends to publish a proposed rule promptly.

- Informed the Department of State of the proposed OECD Decision adopting minimum premarket data (MPD) requirements -- i.e., testing -- for all new chemicals. CMA explained that the position taken by the U.S. delegation to OECD under the Carter Administration, which favored adoption of MPD, directly conflicted with U.S. law (TSCA). Since EPA did not have the statutory power to adopt pre-manufacture testing requirements, EPA could either impose "guidelines" as de facto regulations or seek to amend TSCA to conform to the OECD Decision. In either case, the costs associated with MPD would have a tremendously adverse impact on new chemical introductions, particularly for those having initial low profit margins. The State Department has taken CMA's position under advisement, and the U.S. is now negotiating conforming language for the OECD Decision on MPD.
- Submitted a petition to EPA requesting that the Agency modify its final export notification rule promulgated under Section 12(b) of TSCA. CMA seeks a blanket notice to all nations announcing the export of certain chemicals. EPA now requires each company to submit a notice with its first annual export to a foreign country. CMA's approach would alleviate regulatory burdens on industry and would diminish companies' concern that confidential marketing information would be disclosed. CMA is working with EPA to meet the objectives of our petition. The Agency has stated that it will consider revisions to the rule based on an examination of CMA's petition and EPA's experience.
- Prepared, in coordination with other CMA departments, a detailed regulatory reform package to the President's Task Force on Regulatory Relief, highlighting major regulations under TSCA needing immediate attention. CMA identified the problem needing resolution, proposed a more reasonable solution, and estimated the cost savings that would be realized. CMA's submission has and will continue to be a critical part in the Reagan Administration's regulatory reform blueprint.
- Drafted a policy paper on the Chemical Substances Information System used by government agencies to store and retrieve information used in regulatory decision-making. The paper identified an urgent need to ensure the quality

CMA 055173

of the data being stored so that decisions based on that information would be sound. As a follow-up to the policy paper, CRAC is considering sponsoring a workshop on quality assurance in computer information systems for both government and private industry systems specialists.

- Reviewed and commented on test protocols being developed by EPA under Section 4 of TSCA and by OECD. Whether the protocols being developed by EPA and OECD serve only as guidelines for testing done by the chemical industry or whether they become explicit requirements, the industry's best interest is served by ensuring that they are scientifically valid. They should also provide for enough flexibility to be adaptable to varying experimental conditions for chemicals having differing physical and toxicological properties, and to allow for developments in the evolving science of toxicology. By ensuring that these characteristics are incorporated in the protocols being developed. Test results can be meaningfully applied in evaluating risks associated with a particular chemical.
- Completed the NERA pilot study examining the methodology used to measure the overall economic impact of TSCA on the chemical industry. Evaluation of the study results, while showing preliminary trends and impacts of regulations, most importantly demonstrate that the methodology employed can be used to gain helpful insights into how regulations are impacting the industry as TSCA is implemented.

Community and Public Relations:

CRAC considers the communication of CMA policies and information generated on specific subjects an essential part of its overall mission. Here are some of its initiatives:

- Held quarterly Informational Meetings to keep member company representatives fully apprised of positions developed by CRAC on regulatory proposals, the origins of those positions, and the anticipated effect they would have on company operations. The meetings often gave important insights into how regulatory proposals were developing within EPA, and how companies might rechannel EPA's proposals by providing CMA with company information to support CMA counterproposals. By inviting prominent representatives from the regulatory community to speak at the Informational Meetings, company representatives learned firsthand about the personalities and motivations of several key decisionmakers.

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- Published periodic Toxic Substances Newsletters which were sent to the designated TSCA contact of each member company. Between Informational Meetings and as a supplement to them, important information was sent to members through the newsletter. It also served to communicate CMA's information needs, so that CMA could better support positions being taken with EPA.
- Communicated CMA positions on major regulatory issues to the media. In an effort to voice industry's views on important issues potentially having significant impacts on how companies conduct business, members of CRAC and CMA staff are in frequent contact with members of the trade press. Communicating clearly and concisely, especially on detailed technical matters, so that the trade press writer and reading public understand industry's viewpoint, continues to be a major objective.
- Worked with other trade associations representing the chemical industry to develop a uniform industry position on regulatory proposals having broad impacts. In instances where other trade associations have deferred to CMA as the "lead" association. CMA has kept them fully informed through task group meetings, telephone briefings, and written communications.
- Met or talked with various "public interest groups" having an interest in toxic chemicals in general, or CMA positions on specific TSCA regulations in particular, to more fully appreciate their interests and concerns, and in turn, to detail CMA's position to ensure they completely understood it and its supporting rationale. Through continued meetings with such groups, CRAC hopes to remove adversarial barriers so that reasonable controls on chemicals needing priority attention can be achieved cooperatively.
- Provided input for CMA's Communications Department through articles related to TSCA that were published in CMA News, Chemecology, and other CMA promotional material. Since These publications reach various audiences, CRAC positions on important regulatory matters are broadly disseminated.
- Distributed to EPA members of the trade press, universities, public interest groups, and law schools, copies of CMA's primer, The First Four Years of TSCA. We hoped to expand the base of support for CMA's positions on implementation of TSCA by distributing the primer to key centers of influence, so that more reasonable regulations would evolve from EPA.

CMA 055175

Committee Orientation:

- Briefed each new CRAC member on CMA procedures and policies, and on past and current activities of the committee. A major effort was made to shorten the learning curve inherently present when joining a committee for the first time or after an extended absence. The staff executive and the committee chairman reviewed how to integrate new members into CRAC activities to enhance CRAC's overall effectiveness through good stewardship of its professional resources.
- Prepared a CRAC Procedures Book which contains rules of procedure, charters of CRAC and its task groups, and the objectives and strategies for the committee. The book serves a useful purpose by providing a reference for assessing the performance of CRAC in carrying out its ongoing advocacy programs.
- Held a planning meeting for CRAC members and CMA staff to determine what its long-term objectives should be and what strategies should be employed to meet those objectives in a timely manner. The meeting served an important purpose in sharpening CRAC's focus on a changed regulatory climate ushered in with the Reagan Administration, one which could be used to lay the groundwork for building reason into regulation in future years as well as the present.

CRAC will continue to place a high priority on working with EPA to implement TSCA in a timely and reasonable manner. As many of the major provisions of TSCA have no final rules, CRAC will spend a considerable portion of its time and resources in supporting and advocating its positions before the Agency. Many of CRAC's initial achievements have been in preventing unreasonable final regulations that could have imposed significant burdens on the chemical industry. With the new EPA administration in office, however, industry will be asked to provide more cost-effective approaches that will still accomplish the purpose of the Act. While this presents CRAC with a golden opportunity to ensure reasonable TSCA regulations and to create a framework for future EPA decisions on the control of toxic substances, CRAC will be challenged to meet the expectations of EPA.

Until this year, the CRAC program was largely responsive to an EPA agenda and a regulatory thrust based on using the full breadth of TSCA authority. Emerging agency policy suggests a focus on cost-effectiveness, minimizing burden, and a redefinition of priorities. While the specific activities of CRAC in

CMA 055176

the 1982-83 fiscal year are likely to be dependent to some extent upon the toxics political climate, CRAC will be looking to document that the basic purpose for which TSCA was enacted is now being achieved. The committee will seek to formulate longer term policy goals and alternatives that reflect the dynamics of changing national priorities and political ideology, as well as the interrelationship of other health and environmental programs with TSCA.

CMA 055177

GOALS AND OBJECTIVES
1980-81

CMA 055178

CHEMICAL REGULATIONS ADVISORY COMMITTEE

Goals And Objectives

1980-81

The goals and objectives of the committee are listed in the order to be completed; however, some of them are dependent upon the political climate. Opportunities opened to CMA could suggest a reordering of priorities.

1. Seek reasonable regulations to allow implementation of TSCA in a timely manner.
2. Seek to avoid overlapping actions by states.
3. Seek EPA adoption of CMA positions on all proposals still pending for final action, and respond to and put forth CMA positions on new proposals.
4. Identify opportunities and advocate new policy initiatives for future EPA implementation of TSCA.
5. Seek exemption of low-risk situations, and direct EPA's attention to potential high-risk problems.
6. If administrative processes fail, seek judicial relief as appropriate.
7. Be prepared to seek legislative relief as appropriate.
8. Seek actions to avoid adverse international influence on EPA implementation of TSCA.
9. Establish key contacts with the Executive Branch, Congress and activist groups to effect sound implementation of TSCA.
10. Establish key media contacts to promote public understanding of industry positions on TSCA.
11. Work with other trade associations to promote reasonable implementation of TSCA.
12. Insist on good science as a basis for regulation.

CMA 055179

RESULTS EVALUATED

Reasonable and effective federal implementation of TSCA was sought by:

1.
 - Completing NERA report for release
 - Establishing communications with membership to collect data on regulatory impact
 - Working with OTS Section 8 staff
 - Monitoring EPA on 8(b) activity
 - Monitoring state, OECD, and EEC on recordkeeping and reporting
 - Responding to EPA generic test standard proposals
 - Monitoring EPA test rule activities related to OECD, IRLG, NTP
 - Reviewing EPA Section 4 chemical specific proposals
 - Developing CMA position on ITC procedures
 - Promoting increased industry participation in ITC screening efforts and in voluntary testing
2. CMA sought EPA adoption of CMA positions on proposals pending final action by:
 - Working with EPA staff responsible for developing the proposed regulations
 - Responding to any Agency request for clarification of CMA's formal comments
 - Outlining CMA positions on proposals in the trade press
3. CMA responded to and put forward positions on new proposals through:
 - Development of comments on significant new use rules
 - Collection and analysis of data on the regulatory impact of PMN regulations
 - Submission of comments on EPA's proposed reporting and recordkeeping requirements for asbestos under Section 8(a) of TSCA
 - Petitioning EPA to commence rulemaking under Section 5(h)(4) to grant PMN exemptions
 - Submission of comments on testing and GLP requirements for physical, chemical, persistence and ecological effects testing
4. New policy initiatives for future implementation of TSCA included:

Responded to Rep. Florio's inquiry regarding the adequacy of PMN data

CMA 055180

- Outlined alternative recommendations to specific EPA proposals in comments submitted to EPA
 - Worked with EPA staff to adopt CMA's alternative proposal to the present final export rule under Section 12(b) of TSCA
 - Promoted increased industry participation in ITC screening efforts and in voluntary testing
5. CRAC sought to divert EPA's focus on low-risk situations to potential high risk problems by:
- Promoting PMN exemptions through a petition to EPA
 - Developing the concept of generic PMNs for a finite class of similar low-risk new chemicals
 - Working on a CMA position on ITC screening procedures
 - Commenting on EPA's proposed Section 4 chemical specific test rules
6. CMA sought judicial relief as an intervenor in the NRDC v. Costle suit, which was concerned with the schedule of test rules for ITC priority chemicals under Section 4 of TSCA.
7. CMA did not seek legislative relief but sought to promote its positions before the Congress by:
- Completing the NERA study examining the overall impact of TSCA on the chemical industry
 - Conducting a study on costs associated with PMN requirements
 - Testifying before the House Commerce, Tourism and Transportation Subcommittee, using information obtained from the studies above.
8. Adverse international influence on EPA implementation of TSCA was avoided by:
- Advocating CMA's position on the OECD MPD Decision to the Department of State
 - Obtaining and distributing international activities information
 - Commenting on OECD GLPs, testing guidelines and mutual acceptance of data (MAD)
9. CRAC carried its positions to key contacts in Congress, the Executive Branch and activist groups through:
- Briefing sessions with representatives from the groups identified above. Calls on these groups were generally made to discuss a specific issue in detail, such as PMN exemptions, OECD MPD, Section 12(b) export notification, and testing data that has historically been submitted with PMNs.

CMA 055181

10. Public understanding of CMA positions was promoted by:

- Frequent contacts between CRAC members, CMA staff and trade press reporters
- Dialogue with EPA's communications staff
- Use of various CMA publications featuring articles on the implementation of TSCA provisions and outlining CMA's positions on EPA initiatives.

11. CRAC effectively worked with other trade associations in promoting reasonable implementation of TSCA by:

- Inviting staff from other trade associations to CRAC task group meetings to discuss their members' interests and concerns and to communicate CMA's positions
- Keeping them informed through written communications and telephone briefings
- Attending other trade association meetings, primarily by CMA staff, and providing the committee members copies of draft CMA positions for their early comments

12. CRAC believes that sound science is essential to ensuring that reasonable regulations are promulgated by government agencies:

- In CMA's comments submitted on proposed EPA rules, CMA has advocated using risk assessment criteria in a reasonable way -- examining the effects of a chemical, the exposure under conditions of use, and the costs that would be incurred in regulating the chemical further. CMA has maintained that only by insisting on a sound science basis in regulatory decision-making can EPA begin to control the real risks of certain chemicals.

CMA 055182

GOALS AND OBJECTIVES
1981-82

CMA 055183

CHEMICAL REGULATIONS ADVISORY COMMITTEE

Goals And Objectives

1981-1982

- Promote reasonable regulations to allow implementation of TSCA in a timely manner. Reasonable and timely implementation of TSCA will continue to be a priority goal of CRAC under the new EPA Administration. The opportunity exists for establishing a sound regulatory framework that will be used to gather information and control potentially hundreds of chemicals in the coming years. To be certain that this framework is properly structured, CRAC will need to work with EPA as the various rules that EPA has already proposed are reexamined by the current administration. It is likely that EPA will ask industry, and CMA in particular, to justify its positions on proposed rules with company data that support a less burdensome approach. CMA should be in a position that will allow it to provide a timely and quality response.
- Demonstrate that the purpose for which TSCA was enacted is being achieved, notwithstanding the lack of regulations implementing major provisions in the Act. CRAC will need to show that programs developed within the industry are addressing concerns that the Congress which enacted TSCA were concerned with. We need to document the level of voluntary testing, the availability of information-gathering and retrieval systems, and the existence of programs to control unreasonable risks to health or the environment which are in place within the industry. The effect of documenting the achievement of the spirit of TSCA and articulating it to regulatory bodies and the general public will enhance the industry's image before the public, and will help defuse strong environmentalist initiatives.
- Formulate longer term policy goals and alternatives that reflect the dynamics of changing national priorities and political ideology, as well as the interrelationship of other health and environmental programs with TSCA. CRAC should continue to work with other trade associations and policy groups that are addressing concepts embodied in TSCA, such as: SNURs, the risk list, and the priority given to carcinogens, mutagens and teratogens. In addition, cost effectiveness will continue to be an overriding concern to which CRAC will have to give attention. Development of policy papers that detail how each of these issues relate to TSCA will be considered.

CMA 055184

Identify resources within member companies that will be responsive to government requests for substantiating information. Through CRAC and the subordinate task group structure, individuals involved in CRAC activities will need to identify people and information resources within their companies that can quickly be employed to meet calls for documentation of CMA positions. Once identified, companies will need to commit themselves to providing people and resources. The consequences of industry not being able to respond to a favorable EPA administration must be emphasized to business and regulatory managers within each CMA member company.

Communicate CMA positions to EPA and the public. CRAC will continue to look at ways to "present its case" before the regulatory decision-makers and a skeptical public. This challenge should be viewed as an educational process whose aim is to provide information that will foster a reasonable assessment of industry's positions. CRAC will need to look at the media of communication it now uses to determine whether they are effective, and if so, how we can improve their use.

CMA 055185

BUDGET

1980-1981 Research & Consulting Expenditures and Results

Premanufacture Notification -- \$118,066

- Funds used went toward a comprehensive analysis of the economic impact that EPA's currently proposed PMN regulations are having on the chemical industry. The outside consultants retained for this study, Regulatory Research Service, sent questionnaires to companies that had submitted PMNs to document both direct and indirect costs associated with PMN requirements. The results of the study have provided the basis from which CMA has advocated PMN exemptions to alleviate the adverse impact these requirements already are having on innovation within the industry.

TSCA Impact -- \$135,000

- The NERA pilot study, a study designed to determine whether a methodology could successfully be employed to measure the overall economic impact of TSCA regulations on the chemical industry, was completed. The study did demonstrate that the methodology used could provide information on how and to what extent EPA regulations under TSCA are impacting the chemical industry. As the Act is further implemented and the initial data gathered in the study is supplemented with additional data gained from industry experience with TSCA, we will be able to follow trends of where the greatest impacts are occurring.

1981-1982 Research & Consulting Budget

For fiscal year 1981-82, CMA has budgeted funds according to the following schedule:

Premanufacture Notification	\$ 63,644
TSCA Impact	150,000
Reporting Rules	<u>42,366</u>
Total	\$ 256,000

Because of EPA's reorganization efforts and its reductions in programs and overall budget, the Agency's major regulatory priorities under TSCA are not clearly defined now. As a result, CMA has let no contracts under CRAC's programs during the first quarter of 1981-82. Once EPA establishes a regulatory agenda, CRAC expects to expend research and consulting funds as needed to be responsive to the Agency's programs.

CMA 055187

POTENTIAL PROBLEMS AND SOLUTIONS

CMA 055188

POTENTIAL PROBLEMS AND PROPOSED SOLUTIONS

1. Lack of company commitment to provide resources at a time when a perceived anti-regulatory climate prevails:
 - CRAC will need to articulate the need to press ahead in getting final TSCA regulations for major provisions of the Act. Commitment from company management will be essential to ensure a continued high level of TSCA regulatory initiatives by CRAC.
2. Three task group chairmen will rotate off CRAC this year leaving a potential gap in leadership on key task groups:
 - The chairman of CRAC and CMA staff will work with the remaining members of CRAC to identify individuals to chair those task groups next year, and to fully brief them on their activities.
3. Companies may not be well-equipped to provide regulatory impact analysis information for future EPA proposals:
 - The Impact Analysis Task Group will provide guidance to member companies in organizing an information-gathering and retrieval process that will serve future agency needs for economic impact data.

CMA 055189

REPORT
OF THE
HAZARDS COMMUNICATIONS
SPECIAL COMMITTEE
1980-1981

CMA 055190

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CMA 055191

EXECUTIVE SUMMARY

The Hazards Communications Special Committee has a single objective: to oversee all CMA hazards communications activities. The major accomplishments in meeting this objective for 1980-81 were:

- The Hazards Communications Special Committee was instrumental in the withdrawal of the unreasonable January 16 OSHA proposal for hazards identification.
- On May 27, testimony was presented before the Gaydos Subcommittee on withdrawal of that proposed rule and how worker safety through hazards communications is currently accomplished.
- On July 13, an alternative hazards communication proposal was presented to OSHA for consideration as a performance-based, cost-effective means to communicate hazards information in the workplace.
- A task group on States' Activities was formed to keep abreast of Right-to-Know initiatives springing up in many states and municipalities.

Approximately 3000 man-hours of company and staff time were spent in 1980-81 to achieve such results. While this is a significant expenditure of time and effort, the HCSC activities resulted in an initial cost savings to the industry of \$870 Million, with annual expenditures of \$361 Million. These were the cost estimates of the January 16 proposed rule, which CMA believes to be very conservative estimates.

The 1981-82 budget has been approved at \$150,000, with the bulk of the financing anticipated for economic impact studies. (In 1980-81, there was no formal approved budget for this first year of operation.)

CMA 055192

HAZARDS COMMUNICATIONS SPECIAL COMMITTEE

Charter: Within limits of authority specified by the Executive Committee, the Special Committee will oversee Association hazards communications activities. The scope of these activities includes EPA and OSHA proposals for product labeling, in-plant labeling, material safety data sheets and substance identification lists.

Within this scope, the Special Committee will identify key issues and focus on matters of greatest significance to the chemical industry; establish specific objectives and mobilize resources to produce timely results; advocate responsible regulation within existing statutes; and seek relief from unreasonable regulation by providing alternative language to the agencies, submitting comments to proposed rulemaking, and initiating legal action where appropriate.

The Special Committee will communicate major trends and developments to the Executive Committee, the Board of Directors, the Association President, member companies and other trade associations. The Special Committee will serve for a period of two years on an ad hoc basis. At the end of two years, the Committee's status will be reviewed by the Executive Committee.

Chairman: William C. Krumrei

Membership: 15

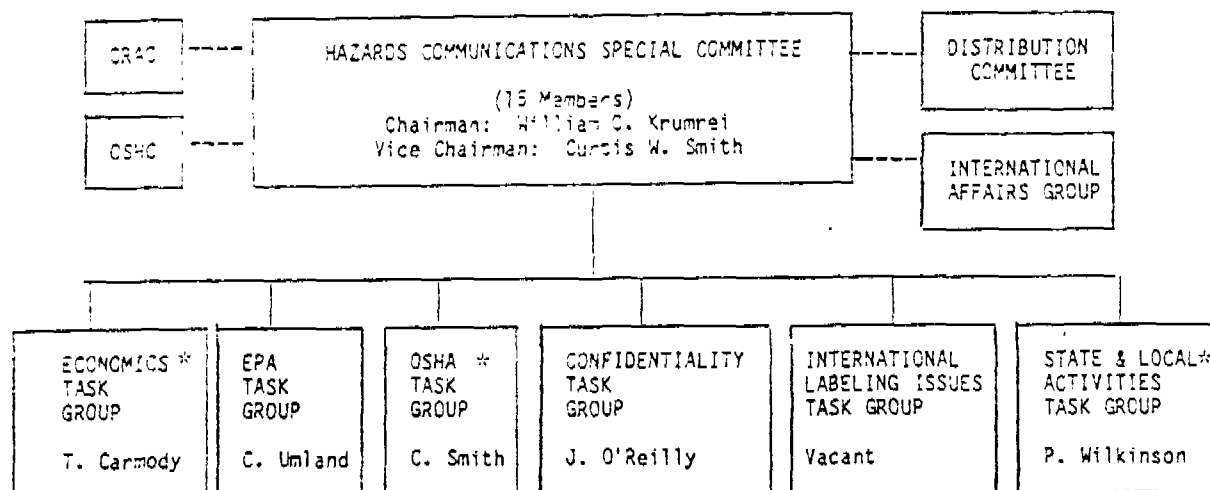
Established: May 13, 1980

Sunset Date: May, 1982

CMA 055193

HAZARDS COMMUNICATIONS SPECIAL COMMITTEE

Organizational Chart



Straight line means direct reporting and management.

Dotted line means: (1) Communication;
(2) Overlapping representation
(3) Opportunity to involve Greenbrier procedures.

R. Comotto/bal
100181

*Currently Active Task Groups -

In FY 80/81, HCSC had 10 active task groups. As each fulfilled its charter they were abolished. Now 6 task groups remain, of which 3 are active -- the SATG, the OSHA TG and the ETG.

CMA 055194

COMMITTEE AND TASK GROUPS SUMMARY CHARTERS

Hazards Communications Special Committee: To oversee Association hazards communications activities including EPA and OSHA proposals for product, in-plant labeling, material safety data sheets and substance identification lists.

B: May 13, 1980

Chairman: William C. Krumrei

D: May 1982

Staff Executive: Rita Comotto

M: 15

Confidentiality Task Group: Develops CMA positions on confidentiality issues associated with labeling rules and standards -- national and international.

B: July 23, 1980

Chairman: James T. O'Reilly

D: July 23, 1982

Staff Executive: Rita Comotto

M: 11

Economics Task Group: Will assess EPA and OSHA estimates of compliance costs and develop industry estimates.

B: July 23, 1980

Chairman: Thomas W. Carmody

D: July 23, 1982

Staff Executive: Rita Comotto

M: 6

EPA Labeling Task Group: Will follow EPA rules on labeling. [Currently inactive]

B: January 30, 1980

Chairman: Carl W. Umland

D: January 30, 1982

Staff Executive: Rita Comotto

M: 25

International Labeling Issues Task Group: Follows and analyzes international labeling initiatives and their impact on U.S. industry and U.S. laws and regulations.

B: July 23, 1980

Chairman: (Vacant)

D: July 23, 1982

Staff Executive: Rita Comotto

M: 12

OSHA Labeling Task Group: Will follow OSHA rules on labeling.

B: January 30, 1980

Chairman: Curtis W. Smith

D: January 30, 1982

Staff Executive: Rita Comotto

M: 25

State and Local Activities Task Group: Monitors the labeling issues within the cities and states concerning the use of hazardous materials and exposure in the workplace.

B: January 1981

Chairman: Paul Wilkinson

D: January 1983

Staff Executive: Rita Comotto

M: 9

B = Beginning Date

D = Sunset Date

M = Membership

Rita Comotto/bal

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CMA 055195

HAZARDS COMMUNICATIONS SPECIAL COMMITTEE

Member Company Resources

<u>Company**</u>	<u>Number of People**</u>	<u>Man-Hours***</u>	HCSC Task Group on International Labeling Issues		
Procter & Gamble	1	64			
Shell Chemical Co.	1	72			
Ethyl Corp.	1	48			
Borden Inc.	1	56			
Diamond Shamrock Corp.	1	32			
Union Carbide Corp.	1	64			
Monsanto Co.	1	64			
Dow Chemical Co.	1	56			
International Minerals & Chemical Co.	1	32			
Koppers Company, Inc.	1	64			
Allied Corp.	1	48			
Borg-Warner Corp.	1	32			
American Hoechst Corp.	1	16			
E.I. du Pont de Nemours	1	64			
Dow Chemical Americas	1	64			
Total		776			
HCSC CSHA Task Group					
<u>Company</u>	<u>Number of People</u>	<u>Man-Hours*</u>	<u>Company</u>	<u>Number of People</u>	<u>Man-Hours*</u>
Shell Chem. Co.	1	48	Allied Chemical Corp.	2	32
Amoco Chemicals Corp.	1	24	Amoco Chemicals Corp.	1	16
Allied Corp.	1	32	Monsanto Company	1	8
Borden Chemical	1	40	International Minerals & Chemical Corp.	1	8
3M Company	1	32	NI Industrial Chemicals	1	8
Diamond Shamrock Corp.	1	8	Procter & Gamble	1	8
Mobil Chemical Corp.	1	40	Olin Corporation	1	16
International Minerals & Chemical Corp.	1	32	American Hoechst Corp.	1	16
Monsanto Company	2	64			112
Dow Chemical Co.	1	40	HCSC Task Group on Confidentiality		
Procter & Gamble	1	48	Procter & Gamble	1	8
Eastman Kodak Co.	1	48	Diamond Shamrock Corp.	1	8
BASF Wyandotte Corp.	1	32	Allied Chemical Corp.	1	8
Kopper Company, Inc.	1	32	Essex Chemical Corp.	1	8
M&T Chemicals, Inc.	1	24	Eastman Kodak Co.	1	8
Essex Chemical Corp.	1	24			40
ARCO Chemicals Co.	1	8	HCSC States Activities Task Group		
GEF Corporation	1	48	Union Carbide Corp.	1	16
Celanese Corp.	1	40	Procter & Gamble	1	24
E.I. du Pont de Nemours	1	48	Dow Chemical	1	16
ICI Americas	1	40	Cincinnati Milacron	1	16
		752	Stauffer Chemical	1	24
			E.I. du Pont de Nemours	1	24
			Atlantic Richfield	1	8
			Monsanto Company	1	16
					144
HCSC EPA Task Group			HCSC Economic Impact Task Group		
Dow Chemical Americas	1	8	Union Carbide	1	40
Dow Chemical Co.	2	16	Stauffer Chemical Corp.	2	16
Mobil Oil Corp.	1	8	Olin Corporation	1	40
International Minerals & Chemicals Corp.	1	8	Eastman Kodak Co.	1	24
Eastman Kodak Co.	1	8	Dow Chemical Co.	1	48
Rohm & Haas	1	8	Buffalo Color Corp.	1	32
Procter & Gamble	1	8			200
Olin Corp.	1	8			
Goodyear Tire & Rubber	1	8			
E.I. du Pont de Nemours	1	8			
		88			

* 33 companies are active

** 77 company representatives actively support the committee

*** Estimated time for FY 1980-81

CMA 055196

CMA Staff*

<u>Name of Committee/Task Group</u>	<u>Meeting Man-Hours**</u>
Hazards Communications Special Committee	456
EPA Task Group	16
Economic Impact Task Group	120
International Labeling Issues Task Group	32
Task Group Chairmen	32
OSHA Task Group	200
Confidentiality Task Group	40
States Activities Task Group	64
Total	<u>960***</u>

* includes technical, legal and/or government relations staff

** estimated time for FY 1980-81

*** Approximately $\frac{1}{2}$ man year was spent in meetings by CMA staff.
An additional 2.3 man years of staff support was required
outside meetings.

CMA 055197

COMMITTEE ACHIEVEMENTS

1980-1981

CMA 055198

COMMITTEE ACHIEVEMENTS

1. Legislation:

The States Activities Task Group, through the activities of the newly-formed Government Relations State Affairs Committee, has successfully worked with the Ohio Manufacturers Association and the Ohio Chemical Industry Council to subdue the Labor push for an Ohio Right-to-Know initiative. In addition, a White Paper on the issues involved in Right-to-Know initiatives is almost completed.

2. Regulatory:

a) As a result of the persuasiveness of CMA and several other outside sources, OSHA's January 16 Notice of Proposed Rulemaking on Hazards Identification was withdrawn. The proposal was described as unworkable, enormously expensive, unnecessarily burdensome, and scientifically unsound.

b) Representatives of the Hazards Communications Special Committee presented testimony at the May 27 Gaydos hearings (Health and Safety Subcommittee of the House Committee on Education and Labor). Curtis Smith (Shell) gave CMA's testimony, which was followed by presentations by Thomas Evans (Monsanto), Carl Umland (Exxon), and Michael Scott (Mooney Chemicals), who each testified for their respective companies. Prior to this presentation, the hearings were dominated by Union representatives -- AFL/CIO (4/7), Steelworkers (4/28), and OCAW (5/19), for example.

CMA's position is that the informed use of all chemicals by workers can be accomplished by means different from and superior to that proposed by OSHA in their January 16 draft. Industry representatives explained this position at the Gaydos hearings.

c) On July 13, the Hazards Communications Special Committee delivered a draft proposal for an acceptable safety and health standard for chemical hazards communications to OSHA's labeling task force. The performance-based proposal contains three key elements:

- 1) Material Safety Data Sheets
- 2) Worker education and training
- 3) In-plant hazards communication.

CMA hopes that OSHA will use this proposal as the basis for their impending Hazards Identification rule.

CMA 055199

3. Community/Public Relations:

The States Activities Task Group went to an Ohio Manufacturers Association meeting to offer assistance in working with the local people with respect to hazards communications information. As a result, the task group's impact was requested on various issues in the Ohio Initiative. (To date, no legislative action has been taken.)

CMA 055200

GOALS AND OBJECTIVES

CMA 055201

HAZARDS COMMUNICATIONS SPECIAL COMMITTEE

Goals and Objectives 1980-81

The goal for 1980-81 was to assist EPA and OSHA in developing reasonable, cost-effective regulations for hazards communications programs.

Results:-

- Comments were submitted to both EPA and OSHA on acceptable wording for rules on hazards communications. Because of the duplicity of work, EPA ceased working on a separate rule.
- Because of pressures by CMA and other outside organizations, OSHA withdrew a labeling proposal that was unworkable, excessively costly, and failed to accomplish the goal of worker protection.
- On July 13, CMA submitted to OSHA a draft of a performance-based, cost-effective proposal for hazards communications which could be used in the development of its rule.
- In addition, the ANSI Task Group of the Occupational Safety and Health Committee has redrafted the ANSI Z-129.1 standard on labeling. This revision, which includes both acute and chronic hazard labeling, is important in the development of a cost-effective regulation because of its widespread acceptance and use by the industry.

CMA 055202

HAZARDS COMMUNICATIONS SPECIAL COMMITTEE

Goals and Objectives 1981-82

The goals for 1981-82 are:

- To aid in and follow the development and promulgation of a reasonable, cost-effective federal rule on hazards communications. This would be accomplished by continuing the dialog between CMA and OSHA and by developing any information needed to effect reasonable regulation (e.g., economic impact evaluations). At this time, a proposed rule has been approved by the Assistant Secretary of OSHA and has been sent to Secretary of Labor Donovan for his signature.
- To monitor Worker Right-to-Know activities in the states and municipalities and to develop hazards communications information for distribution to groups that can prevent excessive and conflicting regulations. This activity will be performed in conjunction with the newly-formed Government Relations State Affairs Committee.

CMA 055203

BUDGET

CMA 055204

HAZARDS COMMUNICATIONS SPECIAL COMMITTEE

Budget Summary

Since the Executive Committee of CMA established the Hazards Communications Special Committee, EPA, CPSC, and OSHA have drafted chemical labeling proposals. Additionally, under Right-to-Know initiatives, 16 states and municipal governments have each proposed different and often conflicting laws and regulations. To preclude conflicts that may arise from such duplicate initiatives, CMA has agreed with the Secretary of Labor to aid OSHA in developing an effective hazards communication standard. Midwest Research Institute and outside legal counsel have been engaged to assist CMA in analyzing both OSHA and CMA proposals to define a cost-effective program acceptable to government and industry which would preclude further state and local initiatives. For FY 1981/82 the Board of Directors approved a Research and Consulting Budget of 150,000 for this effort. Legal fees are separately funded.

CMA 055205

POTENTIAL PROBLEMS/SOLUTIONS

CMA 055206

Statement of Problem

In today's society there is a perceived (or actual) fear of the physical harm from exposure to chemicals. Labor unions have put pressure on federal, state, and municipal regulatory bodies to develop identification and warning systems for workers, and occasionally for the public. As a result, OSHA has been developing a hazards identification rule, eight states and one municipality have "Right-to-Know" laws in effect, and eleven states and four municipalities have pending initiatives.

Proposed Solution

The Hazards Communications Special Committee has been working with OSHA to assist in the development of a workable, cost-effective regulation for hazards communications. In light of the recent flurry of state and local "Right-to-Know" initiatives, it is highly desirable to have a federal rule which has preemptive authority over state municipal regulations. Similarly, the States Activities Task Group of the Hazards Communications Special Committee, through the State Affairs Committee of the Government Relations Department, will continue to monitor activities at the local level. Assistance on issues of "Right-to-Know" will be given through local Chemical Industry Councils and member companies within the area of concern.

CMA 055207

REPORT
OF THE
OCCUPATIONAL SAFETY AND
HEALTH COMMITTEE

CMA 055208

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CMA 055209

OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

EXECUTIVE SUMMARY

Major Accomplishments

Major accomplishments of the Occupational Safety and Health Committee include:

- Providing information and technical expertise to regulators and legislators who look to the Committee for industry representation on occupational safety and health issues.
- Providing a major portion to CMA's contribution to Vice President Bush's Regulatory Reform Task Force.
- Revising its task group structure in late 1980 to react quickly to new trends.
- Bolstering the CMA safety awards program to improve the industry's image.

Health

Revision of OSHA's cancer policy was one of CMA's top ten priorities sent to the Regulatory Reform Task Force. The Agency has not carried out the existing policy and plans to review it soon.

Reproductive hazards in the workplace remain a major chemical industry concern. In its comments on the Inter-agency Regulatory Liaison Group's (IRLG) guidelines for control of reproductive hazards, CMA discussed the complexity and lack of information on this subject. Under the new administration, IRLG is preparing new guidelines; this time with input from industry, including CMA representatives.

CMA reiterated its comments to IRLG in a formal response to the Council on Environmental Quality (CEQ) on their draft document, "Chemical Hazards to Human Reproduction".

In addition, CMA filed an amicus brief supporting a member company's embryofetotoxin policy. The key issue is whether the company can protect the fetus by excluding

CMA 055210

women of childbearing capacity from workplaces where they may be exposed to fetotoxins.

In comments to OSHA, CMA recommended that stays be continued on the amendment to the occupational noise standard. CMA made additional suggestions on remaining parts of the standard to permit continued use of hearing conservation programs which have been so successful in the chemical industry.

OSHA also stayed parts of the rule on access to employee records to consider confidentiality of trade secrets. CMA recommended that negotiations with employee representatives, not regulations, should determine the conditions for allowing access to records with trade secrets. Moreover, CMA continues to intervene in the AFL/CIO legal action to prevent further broadening of access to employee records.

In another response to OSHA, CMA stated that laboratories should be the subject of separate rules rather than required to comply with general industry regulations. Such rules would lighten their recordkeeping and monitoring burden. Moreover, OSHA has proposed a revision to its lead standard in keeping with the CMA suggestion of using qualitative respirator fit testing.

CMA is cosponsoring a pioneering course in cooperation with the American Occupational Medical Association (AOMA), to inform primary care physicians and other health professionals about occupational medicine.

In a cooperative venture with NIOSH, CMA cosponsored a two-day symposium in control technology in the chemical manufacturing industry. The event was well received by the participants.

As part of the Hazards Communications Special Committee, the OSH Committee played a key role in formulating CMA policy on labeling. OSHC worked closely with OSHA personnel and participated in the hearings before Congressman Gaydos' Health and Safety Subcommittee of the House Committee on Education and Labor.

Safety

In written comments and testimony at an OSHA hearing, CMA requested a substantial delay in the rulemaking procedure to allow time for considering major changes in rules. CMA is suggesting that work practice standards be performance goals that address Hazardous Materials and other workplace hazards.

CMA 055211

CMA testimony on lockout and tagging of equipment helped deflect a rigid rule. The regulation would have required extensive and costly changes in the practices of many member companies.

CMA specifically, argued against a proposed rule on conveyors. While the Agency may yet publish such a rule, it would now probably be a performance goal so that compliance would not be an unreasonable burden for the chemical industry.

CMA endorsed OSHA proposals for targeting safety inspections and made suggestions for improvement. These included the use of OSHA recordable injuries and self-reporting of these data to the Agency. OSHC will continue to work with them on this matter.

CMA argued that walkaround pay is a collective bargaining issue rather than a safety issue. The proposed rule has been eliminated by the new OSHA administrator.

Finally, CMA recommended the exclusion of bulk liquid terminals from a proposed OSHA regulation on marine terminals. Existing regulations adequately protect workers at such terminals.

Legislation

OSHC worked with Senate staff members to support the Schweiker Bill. The Bill would have eased the inspection burden on relatively safe companies.

Overall OSHC/Staff Activities

The program structure and management of OSHC were strengthened by reexamining task group missions. Consequently a group on Health Standards was established to deal with specific health concerns such as cancer policy, hearing conservation, and reproductive hazards. Further realignment and personnel changes are planned to handle new issues as they arise. The effectiveness of CMA staff was significantly improved through better coordination with these Government Relations and Legal Departments.

OSHC's efforts were refined to increase the Committee's impact on legislative and regulatory processes. Refinements were designed to:

- Identify at an early stage emerging occupational safety and health issues.

CMA 055212

Establish timetables for early drafts to allow member companies to use applicable arguments in their own responses.

- Monitor and influence NIOSH and OSHA research programs.

Member Company Personnel

Eighty-one people from 35 companies participated in OSHC efforts. In the coming year, participation by member company personnel is expected to rise about 20 percent because of the opportunity to change regulatory policies under the Reagan Administration.

CMA Staff Personnel

One professional and one supporting staff member are assigned full time to OSHC. However, the Committee is part of the Health, Safety and Chemical Regulations Division and assistance and advice are available from the director and other members of the Division and from senior CMA staff.

Routine professional support from outside the Technical Department includes the equivalent of one attorney from the Legal Department and one-fourth person from the Government Relations Department. Also, the librarian has helped organize and distribute background documents to interested members.

Budget

The Fiscal Year 1981/1982 Research and Consulting budget for OSHC, \$45,000, reflects a planned emphasis on occupational medical training. It also includes starting a project to analyze costs of compliance with OSHA rules. Planned expenditures for health and safety grants during Fiscal Year 1981/82 are the same as for last year, about \$10,000.

CMA 055213

Value to Industry

We do not currently have a way to quantify dollar savings attributable to Committee activities. Yet we should keep in mind, important employee relations and public image aspects of the Committee's work. Estimates of avoidance of added costs are in the following categories:

- Redirection in agency programs. There are billions of dollars in potential savings if we succeed in deflecting inappropriate rules.
 - Draft revision of ANSI Z129.1 labeling standard is serving as a basis for discussions with OSHA.
 - Elimination of inappropriate requirements, as in the noise standard, avoids costly conflicts with the Agency.
 - Revision of the OSHA cancer policy to put it on a firmer scientific basis will preserve many commercial products.
- Savings due to timely and sound comments in early stages of agency programs.
 - Continuing CMA input to Interagency Regulatory Liaison Group (IRLG) on reproductive hazards helps reduce the chance for rigid guidelines based on poorly developed scientific tests.
- Influencing Legislation
 - We are working with other industry groups to update our OSHA reform program.

In addition, some Committee programs considered necessary cannot be related directly to immediate financial benefits. Examples are:

- Annual Symposia like the successful one on "Control of Workplace Hazards in the Chemical Manufacturing Industry," in Philadelphia, March, 81.
- Safety Awards Program
 - Lammot DuPont Safety Award
 - Certificates of Achievement and Honor

CMA 055214

- Safety Statistics - Occupational Injury & Illness Reports
- Legal action on OSHA regulation on Access to Employee Records and the issue of protecting the fetus.
- Education
 - In cooperation with the American Occupational Medical Association, we co-sponsored an innovative course to inform private family physicians about occupational illnesses. It was held October 2 and 3, 1981, in Charleston, South Carolina.
 - A task group has been established on worker education to keep abreast of the 'state of the art' in industry and to become familiar with the thinking in the agencies so that proposed regulations can be anticipated.
 - An informational meeting was held April, 1981, to keep member company representatives abreast of OSHC activities.

CMA 055215

Occupational Safety and Health Committee

Members

Term Ending May 31, 1982

Harry A. Eschenbach	W. R. Grace & Company
Thomas F. Evans (Chairman)	Monsanto Company
Donald W. Hillman, M.D.	Diamond Shamrock Corporation
Richard B. Hoots, Jr.	ICI Americas, Incorporated
Arthur W. Sheldon	M & T Chemicals Incorporated

Term Ending May 31, 1983

Warren S. Ferguson*	Allied Corporation
Patrick McNulty	Rohm & Haas Company
Jerry Robertson	Exxon Chemical Americas
Ronald Van Mynen**	Union Carbide Corporation
John R. Wheeler	The Standard Oil Company (Indiana)

Term Ending May 31, 1984

Joseph Caporossi	American Cyanamid Company
John Dougherty, M.D.	Celanese Corporation
Charles Richards	Gulf Oil Chemicals Company
Charles Ryan, M.D. (Vice Chairman)	Sun Company

CMA 055216

Ned K. Walters	E. I. du Pont de Nemours & Company
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*Mr. Ferguson is completing the unexpired term of Jonathan Plaut of Allied.

**Mr. Van Mynen is completing the unexpired term of Myrl Miller of IMC Corp.

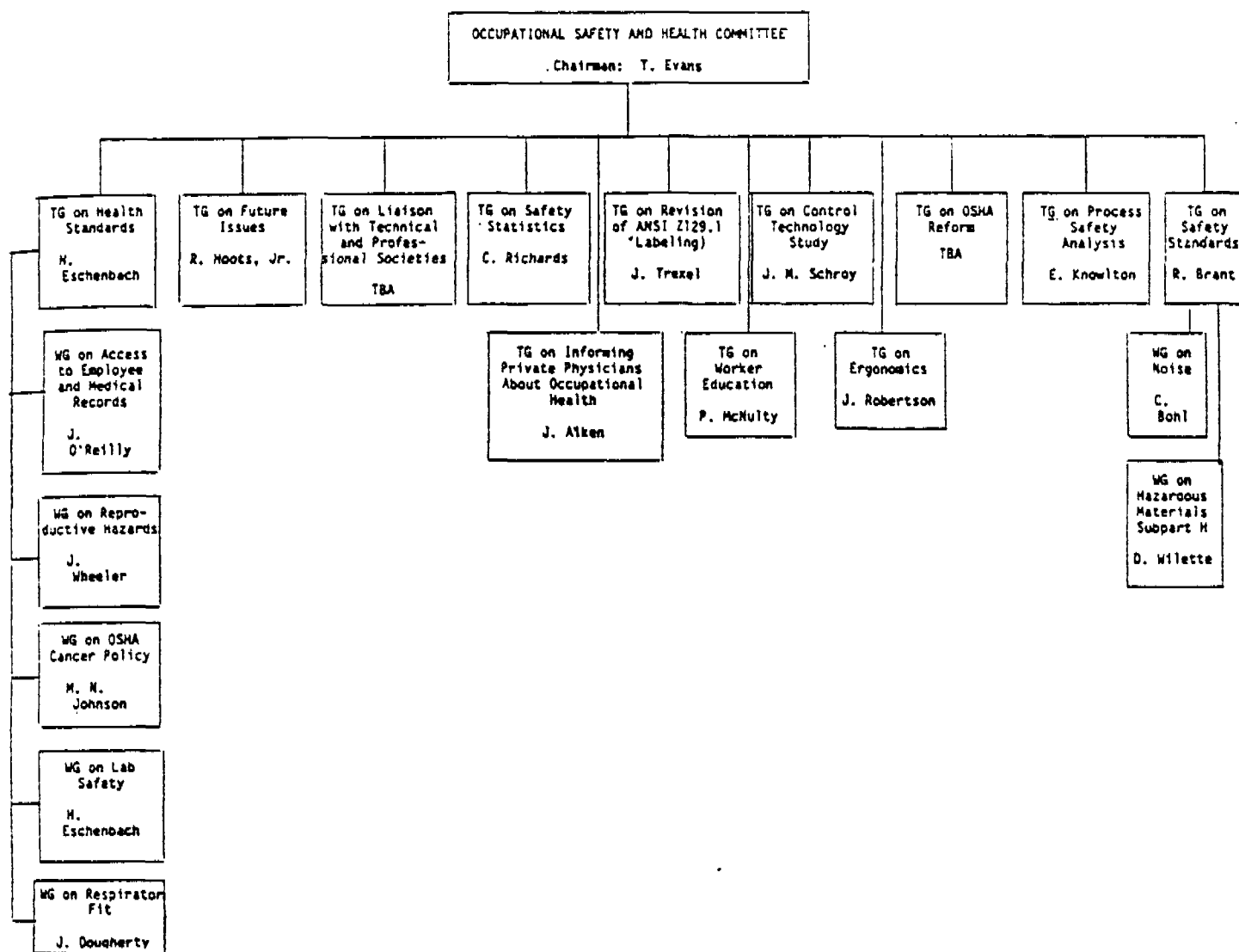
OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

Charter

With respect to occupational health, plant safety, fire protection, and precautionary labeling matters significant to the chemical manufacturing industry, the Committee will: serve as a forum for discussion of chemical manufacturing industry concerns; develop and recommend to the Executive Committee policies and positions on legislative, regulatory, and technical questions; and provide support for authorized Association programs.

CMA 055217

Committee
ORGANIZATIONAL CHART



NOTE: There was a net increase of six task groups and work groups during FY 81/82.

CMA 055218

COMMITTEE AND TASK GROUPS SUMMARY CHARTERS

Occupational Safety and Health Committee: Identify key occupational safety and health issues and establish specific objectives to deal with them. Try to anticipate as well as react to regulatory and legislative initiatives on this subject. Seek to become a major force to which the Agencies turn for industry representation on all occupational safety and health issues. Keep member companies informed of major trends and association action in this area. Initiate and sponsor research and development on related issues. Oversee the safety awards program as well as collection and publication of data on occupational injury and illness.

B: June 1981

Chairman: Thomas F. Evans

D: June 1982

Staff Executive: Milton Freifeld M: 15

Task Group on Health Standards: Try to avoid regulations where not needed. Assist OSHA in issuing reasonable regulations when they are necessary.

B: July 1981

Chairman: Harry Eschenbach

D: May 1983

Staff Executive: Milton Freifeld M: 10

Work Group on Access to Employee & Medical Records: Guide implementation of CMA decisions regarding legal and regulatory action on access to employee and medical records.

B: July 1980

Work Group Leader: James T. O'Reilly

D: July 1982

Staff Executive: Milton Freifeld M: 4

Work Group on Reproductive Hazards: Respond to regulatory and legislative initiatives, anticipate agency actions and disseminate relevant information to member companies relating to reproductive hazards.

B: May 15, 1980

Work Group Leader: J. R. Wheeler

D: December 1983

Staff Executive: Milton Freifeld M: 7

Work Group on OSHA Cancer Policy: Attempt to have OSHA modify this regulation along lines proposed by AIHC. Participate in administrative process for regulating individual chemicals where matter of principle is involved when OSHA begins to implement its cancer policy.

B: July 1980

Work Group Leader: M. N. Johnson

D: May 1982

Staff Executive: Janet A. Steel M: 5

Work Group on Lab Safety: Encourage separate OSHA regulations or guidelines for laboratories so they can be relieved of general industry requirements for recordkeeping and monitoring.

B: March 1981

Work Group Leader: Harry Eschenbach

D: December 1982

Staff Executive: Milton Freifeld M: 3

Work Group on Respirator Fit: Work with other industry groups to have OSHA adopt a qualitative fit test for respirators. It has been tested in the workplace and found far less expensive than the current quantitative test.

Work Group Leader: J. Dougherty

Staff Executive: Milton Freifeld

Task Group on Future Issues: Provide early warning on major legislative and regulatory issues regarding safety and health. Recommend course of action and priority in each case.

B: January 1979

Task Group Leader: R. B. Hoots, Jr.

D: May 1983

Staff Executive: Milton Freifeld M: 6

Task Group on Liaison with Technical and Professional Societies: 1) Provide CMA input to the policy-making and other functions of these associations. (2) Obtain information about safety and health issues facing the chemical industry.

B: July 1979

Task Group Leader: To Be Announced

D: May 1983

Staff Executive: Milton Freifeld M: 2

Task Group on Safety Statistics: Update instructions for member companies wishing to participate in the CMA program on Occupational Illness and Injury Reports, Lamont Dupont Award, and Certificates of Achievement and Honor programs. Encourage member company participation.

B: September 1978

Task Group Leader: Charles Richards

D: December 1983

Staff Executive: Milton Freifeld M: 6

B = Beginning Date

D = Sunset Date

M = Membership

CMA 055219

Task Group on Revision of ANSI Z129.1 (Labeling): Assume key role in discharging responsibilities of CMA as secretariat in the revision of ANSI Z129.1 (American National Standards for the Precautionary Labeling of Hazardous Industrial Chemicals) in accord with ANSI requirements.

B: May 1981

D: May 1983

M: 12

Task Group Leader: J. J. Trexel

Staff Executive: Rita Comotto

Task Group on Safety Standards: Influence OSHA to issue reasonable regulations where necessary and avoid regulations entirely where they are not needed. Draft responses to agency proposed standards.

B: January 1979

D: May 1983

M: 10

Task Group Leader: R. Brant

Staff Executive: Milton Freifeld

yet protects the worker.

B: August 1981

D: December 1982

M: 7

Work Group Leader: C. Bohl

Staff Executive: Milton Freifeld

Work Group on Hazardous Materials (Subpart H): Suggest to OSHA the development of work practice performance standards which could be used for a variety of hazards.

B: June 1980

D: December 1982

M: 4

Work Group Leader: D. Wilette

Staff Executive: Milton Freifeld

Task Group on Control Technology Study: Discuss with NIOSH and their contractor Enviro Control their planned study on control technology in the chemical manufacturing industry.

B: March 1981

D: June 1983

M: 4

Task Group Leader: J. M. Schroy

Staff Executive: Milton Freifeld

Task Group on OSHA Reform: Many OSHA Regulations and attitudes were anti-industry. Work with present administration to maintain even-handed approach to rulemaking. Consider legislative action to consolidate gains.

B: July 1980

D: July 1982

M: 6

Task Group Leader: Jonathan Plaut

Staff Executive: Milton Freifeld

Task Group on Informing Private Physicians about Occupational Health: To catalyze a program for bringing information about occupational health to family physicians, in cooperation with professional associations information about occupational health to family physicians, in cooperation with professional associations

B: July 1980

D: July 1982

M: 5

Task Group Leader: J. Aiken

Staff Executive: Milton Freifeld

Task Group on Worker Education: Gather industry information on this subject that will be useful in responding to regulatory and legislative initiatives. This data will also be distributed to member companies.

B: October 1980

D: May 1982

M: 11

Task Group Leader: P. McNulty

Staff Executive: Milton Freifeld

Task Group on Ergonomics: Keep abreast of government thinking on ergonomics and inform the Committee and member companies of trends.

B: October 1980

D: May 1982

M: 5

Task Group Leader: J. Robertson

Staff Executive: Milton Freifeld

Task Group on Process Safety Analysis: Gather data for dissemination to members about techniques for analyzing process safety programs and how to use this information.

B: July 1981

D: July 1983

M: 5

Task Group Leader: E. Knowlton

Staff Executive: Milton Freifeld

B = Beginning Date

D = Sunset Date

M = Membership

Milton Freifeld/bal

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CMA 055220

OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

Company (35 Total)	No. of People	Total Meeting Days
Air Products & Chemicals, Inc.	1	2
Allied Corporation	4	14
American Cyanamid Company	2	2
American Hoechst Corporation	1	1
Amoco Chemicals Corporation	5	8
ARCO Chemical Company	1	1
Borg-Warner Chemical	1	1
Celanese Corporation	2	3
Cities Service Company	1	7
Conoco Incorporated	1	2
Diamond Shamrock Corporation	3	8
Dow Chemical Company	3	6
E. I. du Pont de Nemours & Company	10	14
Eastman Kodak Company	1	1
Exxon Chemical Company	2	6
FMC Corporation	2	2
BFGoodrich Company	2	2
W. R. Grace & Company	1	8
Gulf Oil Chemical Company	2	5
Hercules Incorporated	1	6
ICI Americas Incorporated	5	10
IMC Corporation	1	4
M&T Chemicals, Incorporated	1	3
Merck & Company, Inc.	1	5
3M Company	2	4
Monsanto Company	7	15
Olin Corporation	1	2
PPG Industries, Inc.	1	1
Procter & Gamble Company	2	2
Rohm & Haas Company	2	7
Shell Chemical Company	5	6
Sherex Chemical Company, Inc.	1	2
Stauffer Chemical Company	3	3
Tennessee Eastman Company	1	1
Union Carbide Corporation	2	5
	<u>81</u>	<u>170</u>
CMA STAFF	11	52.5

CMA 055221

COMMITTEE ACHIEVEMENTS

FY 1980 - 1981

CMA 055222

OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

Achievements FY 1980 - 1981

Committee achievements in each of the following categories are listed in order of their significance to the chemical industry:

Legislative:

- OSHA Reform

CMA worked on developing constructive recommendations for OSHA reform designed to change administratively the Agency's adversarial approach, emphasize performance standards, reward good safety records and support President Reagan's Executive Order No. 12291 on regulatory relief. This CMA effort is in close cooperation with the Chamber of Commerce and the National Association of Manufacturers.

The Schweiker bill would have relieved companies with good safety records from routine safety inspections. We supported this bill in the last Congress.

- Workers' Compensation

CMA continues to work with House and Senate committees which are considering legislation to establish uniform national minimum standards for state workers' compensation of victims of occupational disease in several specific industries. CMA is maintaining a presence with key committees, particularly regarding proposed occupational disease standards, to be in a position to help shape the outcome should passage of this legislation become more likely.

Regulatory:

- In a letter to the Council on Environmental Quality, CMA said the short time allowed for review of a draft report on reproductive hazards precluded adequate peer review. Nevertheless, some technical errors in the draft were pointed out. CMA stressed that without a sound framework to deal with the current state of the art, federal regulators may be misdirected. This point was also emphasized in CMA comments on the Interagency Regulatory Liaison Group's draft guidelines on reproductive hazards.

As recommended by CMA, the Equal Employment Opportunity Commission and the Department of Labor withdrew proposed guidelines on workplace reproductive hazards.

CMA 055223

Also as recommended by CMA, the Office of Management and Budget withheld approval of the National Institute of Health's proposed "Occupational Cancer Questionnaire."

- CMA met with Thorne Auchter, Assistant Secretary of Labor, to present CMA's recommendations on priorities in standards development and changes in the Agency. This included a suggestion to review the Agency's cancer policy.
- CMA submitted position papers on OSHA regulations on cancer policy, noise, walking, and working surfaces and hazardous materials in response to Vice-President Bush's request to identify priority regulatory concerns.
- On August 7, 1981, OSHA proposed modification of the trade secret provision of the access to employee records regulation. CMA urged that the change should permit employers to include liquidated damage clauses or the like in confidentiality agreements with employees and their representatives. CMA is involved in litigation on the access to records issue.
- CMA asked Secretary of Labor Raymond L. Donovan to postpone the effective date of the final noise rule amendment issued during the last days of the Carter Administration.
- A CMA targeting plan for safety inspections is similar in concept to one drafted by OSHA, but with important differences:
 - (1) CMA's plan of self-reporting improves OSHA's effectiveness by avoiding the need for trips to sites where an inspection is not required.
 - (2) The CMA plan uses the OSHA recordable injuries, which give a broader measure of performance.
- The Association recommended that OSHA's effort to modify Subpart H, Hazardous Materials, be reconsidered and asked for a 90-day extension if the Agency persists.
- CMA filed comments urging OSHA not to issue an equipment-specific standard like the one proposed for conveyors and instead, to rely on hazard-oriented, performance standards.
- In response to OSHA questions about regulations for laboratories, CMA recommended that laboratories be covered by separate rules rather than general industry requirements.

CMA 055224

- CMA recommended to OSHA that pesticides and similar generic classes should not be singled out for regulation.
- CMA commented to OSHA that there was no need for its proposed rule on walkaround pay for employees during formal inspection.
- Workers at bulk liquid terminals are already adequately protected by existing regulations. Hence, CMA wrote in comments to OSHA, such locations should not be covered in proposed regulation on marine terminals.
- In comments on the U.S. Coast Guard (USCG) report "Principles of Toxicological Interactions Associated with Multiple Chemical Exposures", CMA said the first consideration should be to adequately protect USCG personnel. We also recommended that the development of early warning systems for chronic occupational illnesses should be undertaken in conjunction with other interested parties.

Community and Public Relations:

- CMA worked closely with member companies who refuted a misguided study by the Council on Economic Priorities (CEP). We obtained an analysis of the CEP study by the Department of Labor pointing out the errors in their data base and their use of inappropriate measures of safety performance.
- We publicized the fine safety record of our industry and the winners of CMA safety awards.

Educational:

- CMA held a joint symposium with the National Institute for Occupational Safety and Health.
- We helped organize and conduct the first course of its kind on industrial medicine for primary care physicians and other health professionals.
- Through periodic newsletters and an informational meeting last spring, we kept interested personnel in member companies informed about major occupational safety and health issues.

CMA 055225

GOALS AND OBJECTIVES

CMA 055226

OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

GOALS AND OBJECTIVES

FY 1980 - 1981

Health

- A. Maintain communication with various agencies so we can "educate" them on the intricacies and problems of dealing with workplace reproductive hazards.
- B. Assist in convincing OSHA and EPA to keep regulations on labeling reasonable and performance-oriented.
- C. Limit, as much as possible, access to employee records to those with a legitimate need to know.
- D. Monitor OSHA's implementation of its cancer policy as it is applied to specific chemicals and where precedent is involved, work with member companies to defend specific chemicals.
- E. Catalyze programs, in cooperation with professional organizations, that inform general practice family physicians about occupationally caused illness.
- F. Prevent enactment of legislation based on emotion and poor science that could lead to inordinate costs.

Safety

- G. Continue commenting to OSHA early in the rulemaking process on contemplated regulations.
- H. Encourage a larger proportion of our membership to participate in the Safety Awards and Safety Statistics programs.

Safety and Health

- I. Maintain close coordination with sister associations to develop more effective strategies and to use resources efficiently.
- J. Plan strategy for OSHA reform on both legislative and administrative level.

CMA 055227

- K. Workshops, symposia and other means of communicating with interested people in member companies will continue to be used to air health and safety issues.
- L. Lay groundwork for substantive input to agencies where we have early signals regarding their preparation for future regulations. Cases in point are ergonomics and stress, plus worker education. Factual presentations will generally aim at increasing our credibility and stature as a resource to the agencies.
- M. The OSH Committee is dedicated to becoming a household word throughout NIOSH and OSHA. We expect agency personnel to look to this CMA group for leadership in formulating our industry's position in matters of occupational safety and health.

CMA 055228

OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

How OSHC Goals and Objectives for FY 1980 - 1981 Were Met

Health

- A. CMA representatives participated in a recent IRLG workshop charged with drafting guidelines for reproductive hazards in the workplace. We stressed the difficulties created by the early stage of development for such tests and succeeded in having numerous caveats put in the draft.
- B. The Committee played a significant role in the Hazards Communications Special Committee's work; in drafting positions and in advocating them to OSHA.
- C. CMA legal action on access to employee records continues. Also, we recently commented to the Agency about strengthening protection of trade secrets when providing access to employee representatives.
- D. Because OSHA has not implemented its cancer policy, we have not been called on to defend specific chemicals. We do plan, however, to work with the Agency in reviewing the basic policy.
- E. We cosponsored an innovative two-day course in occupational medicine for primary care physicians and other health professionals.
- F. When Congress again deals with the occupation-illness relationship, as anticipated, we will reiterate the precautions we have already stated.

Safety

- G. We filed comments with OSHA during the early stages of regulation development for noise, hazardous materials, conveyors and other proposals. Further, drafts of planned CMA positions were sent to member companies for their use.
- H. A campaign to boost members' participation in our safety statistics and awards programs was moderately successful, but still not adequate. The Committee is developing new plans to improve participation.

Safety and Health

CMA 055229

- I. CMA staff members participate regularly in meetings on OSHA with staffs of other trade associations. The work is distributed among participants to prevent overlap. We also have a loose coalition with a smaller staff group who have close ties to the chemical industry.
- J. The new administration has completely changed the Agency's former adversarial attitude toward industry. We are working closely with the current administrators to help effect other beneficial changes. A program for legislative reform will be prepared during the next year.

- K. The Committee cosponsored with NIOSH a symposium on control technology. An information meeting was also held to update people in member companies about OSHC activities.
- L. A task group on ergonomics is gathering information on the subject and will report soon. The Worker Education Task Group is developing a questionnaire to determine members' needs related to worker education programs. Results will be reported when available.
- M. We are providing necessary operating, technical and scientific information to the Agency. Also, we are initiating a program encouraging personal interaction between members of the OSH Committee and Agency personnel in areas of common interest.

CMA 055230

OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

Goals and Objectives of 1981-82

- A. Remain a significant source for agencies to call upon to develop scientific and regulatory positions on key issues of occupational safety and health.
- B. Promote CMA cooperative attitude and leadership position at agencies.
- C. Influence agencies to approach state occupational safety and health plans cautiously to avoid proliferation of various state regulations.
- D. Help OSHA to develop a targeting plan for health inspections.
- E. Make better use of occupational injury and illness (OII) data to improve industry's image and to assist OSHA in targeting inspections.
- F. Assist the agencies every way we can to achieve our common goal of reducing workplace illness and accidents.

CMA 055231

OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

How We Plan to Meet the Goals and Objectives of 1981-82

- A. Continue to provide thoughtful written and oral comments to agencies from the time a regulatory initiative is conceived through its entire development.
- B. Establish close working relationships with Agency personnel at all levels. Continue the practice of inviting key government people to attend part of each Committee meeting.
- C. Promote OSHA promulgation of suitable regulations, such as labeling, which should have a preemptive effect on state laws.
- D. Offer ideas, data, and expertise to the Agency.
- E. Improve our credibility by increasing the proportion of member companies participating in our OII Reports. Simplification of forms and rules plus an intensive campaign should accomplish this.
- F. Suggest to the Agency, adoption of performance rules that consist of successful methods currently used in our industry.

CMA 055232

BUDGET

CMA 055233

BUDGET

1980 - 1981 Research and Consulting Expenditures and Results:

Health and Safety Project Grant -- \$10,150

Grants for health and safety projects of \$10,150 were used to provide seed money for the pilot effort on informing private physicians about occupational medicine and to support an industry-wide research program on hearing conservation. These are worthwhile endeavors that we believe are providing useful information and helping to improve our industry's image.

PROJECTED RESEARCH AND CONSULTING BUDGET

FY 1981 - 1982

Expenditures for health and safety project grants are expected to remain at the same level as last year, about \$10,000. However, new areas may be included.

Increased attention will be given to occupational medical training. In addition to expanding the courses for family physicians, a program on disaster response training may be started. CMA has budgeted \$25M for this effort.

Currently, we lack data on the cost of compliance with OSHA regulations. We will investigate means of generating such estimates, particularly for proposed new rules or those considered for elimination. These efforts will be closely coordinated with CMA's Public Risk Analysis Special Committee. Because studies are not planned until March 1982, only \$10M is budgeted for FY 81/82.

CMA 055234

POTENTIAL PROBLEMS/SOLUTIONS

CMA 055235

POTENTIAL PROBLEMS AND POTENTIAL SOLUTIONS

1. The public has a poor perception of the chemical industry's activities. We can help improve this image by upgrading the quality and quantity of our safety and health statistics.
2. Unions and others will continue to press for rigid, specification-type regulations. We will provide the agency with arguments, data and other assistance for casting rules in performance language.

Strategy for the New Administration

Working with those now in power, we can help put in place federal regulations that permit our members to concentrate their energies on improving workplace safety and health. This would be in contrast to the effect OSHA has had of diverting attention of professionals in this field to complying with unnecessary or ill-conceived rules.

There are some areas of potential difference in policy with the new administration. Examples are in the emphasis on state v. federal regulation and the approach to labor-management safety committees. However, we believe satisfactory accommodations can be reached on these matters through discussion, as in the case of OSHA's proposed labeling regulation.

Once we and the new administrators have determined which methods work best, we will try to entrench these changes through legislative action. That would make it more difficult for a possible future, less sympathetic administration to reverse the tide of progress.

CMA 055236

REPORT
OF THE
PUBLIC RISK ANALYSIS
SPECIAL COMMITTEE
1980-1981

F-92

CMA 055237

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CMA 055238

PUBLIC RISK ANALYSIS SPECIAL COMMITTEE

EXECUTIVE SUMMARY OF ACTIVITIES

The Public Risk Analysis Special Committee surpassed the major goal in its charter. PRASC's primary objective was to recommend an appropriate chemical industry position on public risk analysis to the CMA Board of Directors. PRASC ultimately developed a policy for regulatory impact analysis for health, safety and environmental regulations.

PRASC's secondary goal, to develop risk management techniques that CMA could advocate and use, was partially achieved by developing an analytical framework for cost and risk analysis. The committee will develop a data base, along with a set of analytical and data gathering techniques, following approval of a new charter.

PRASC's achievements required 155 meeting man-days -- 117 company meeting man-days plus 38 CMA staff meeting man-days. If CMA had not coordinated this activity, each company would have required its own effort to provide a capability to respond to Government agency regulatory impact analyses.

Originally, CMA committed one staff executive and a secretary to this activity. Now, because of PRASC's expanding role into regulatory impact analysis, two staff executives and a secretary support the committee's activities.

CMA 055239

PUBLIC RISK ANALYSIS SPECIAL COMMITTEE

MEMBERS

The membership roster of PRASC is shown below. All terms end on October 27, 1981.

Leslye Arsht
Jackson Browning
Gerald Hapka
Peter Ifland
Martin Kemplin
Thomas Malorzo
William McCormick
William Newbury
Richard Patterson
Thomas Rhodes
William Richard
Robert Shaw
Konrad Weis
John Wheeler
Rene Zentner

Cabot Corporation
Union Carbide Corporation
E. I. du Pont de Nemours
The Procter & Gamble Co.
American Cyanamid Co.
Diamond Shamrock Corporation
3M Company
Conoco Inc.
Dow Chemical USA
Exxon Chemical Americas
Monsanto Company
Stauffer Chemical Company
Mobay Chemical Corporation
Standard Oil Co. (Indiana)
Shell Oil Company

CMA 055240

PUBLIC RISK ANALYSIS SPECIAL COMMITTEE

INTRODUCTION

The chemical industry has advocated risk analysis as the most logical decision-making tool for highly complex issues such as chemical safety. The recent Supreme Court Benzene decision forces OSHA to consider risk and benefits of benzene before it modifies regulatory action. Congressmen are discussing possible legislation to define acceptable risk.

Methods and applications of risk analysis are being developed in universities and government. The issue of risk analysis will have a unique impact on the chemical industry. Industry is responsible to understand and participate in the evolving application of risk analysis.

Consequently, the Executive Committee of the Chemical Manufacturers Association established the Public Risk Analysis Special Committee to perform the following activities:

CHARTER

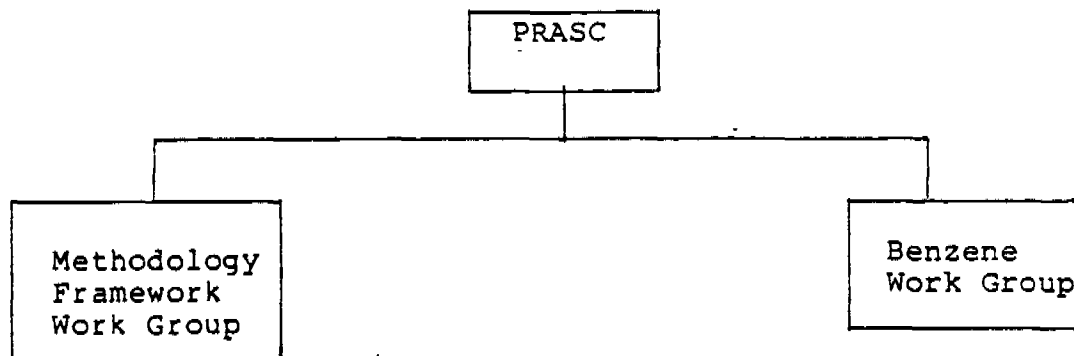
Under the policies established by the Board of Directors and within the limits of authority specified by the Executive Committee, the Special Committee will evolve and recommend to the Board of Directors chemical industry positions on the value, limitations and practice of public risk analysis. The Special Committee will determine or develop appropriate public risk management techniques* that CMA can advocate and use in its regulatory or legislative activities, with emphasis on those techniques for managing health risks.

Concurrently, the Special Committee will maintain liaison with organizations active in public risk/benefit analysis, and will especially promote an exchange of information within the chemical and allied industries.

* Public risk management techniques have sometimes been more narrowly described as the application of risk/benefit/cost analyses.

Public Risk Analysis Special Committee

Organization



Constitution Date: October 27, 1980

Sunset Date: October 27, 1981

Committees and Task Groups

PRASC was structured to focus technical expertise on defining the boundaries of public risk analysis and to develop a CMA posture in this rapidly evolving field. Consequently, the full committee assumed the burden of most tasks to provide a maximum transfer of knowledge among committee members and with other interested organizations. Only limited and highly technical tasks are delegated to work groups.

Chairman: Konrad Weis

Vice Chairman: Jackson Browning

Staff Executive: D. Christopher Cathcart

The Methodology Framework Work Group was given the task of developing a technical framework for risk analysis that could be adopted once a CMA policy for risk analysis was established.

Chairman: Thomas Rhodes Staff Executive: Christopher Cathcart

The Benzene Work Group was formed to examine the implications of the "Benzene" decision on public risk analysis and to develop a specific risk analysis case.

Chairman: William Richard Staff Executive: Christopher Cathcart

CMA 055242

PUBLIC RISK ANALYSIS SPECIAL COMMITTEE

Resources

<u>Company</u>	<u>Number of People</u>	<u>Meeting Man-Days 1980-81</u>	<u>Meeting Man-Days 1981-82</u>	<u>Total Meeting Man-Days *</u>
Mobay Chemical Corp.	1	8	3	11
Union Carbide Corp.	1	0	2	2
Cabot Corporation	1	5	0	5
E. I. du Pont de Nemours	1	6	2	8
Procter & Gamble	1	6	1	7
American Cyanamid	1	5	1	6
Diamond Shamrock	1	8	2	10
3M Company	1	4	0	4
Conoco Inc.	1	4	2	6
Dow Chemical	1	1	2	3
Exxon Chemical Americas	1	10	4	14
Monsanto Company	1	12	3	15
Stauffer Chemical Co.	1	8	1	9
Standard Oil Co. (Indiana)	1	5	0	5
Shell Oil Co.	1	8	4	12
<u>Company Total</u>	15	90	27	117
CMA Staff	—	21	17	38
Total Company and Staff	—	111	44	155

CMA 055243

* Total includes all meetings from data Chartered, October 27, 1980, through October 27, 1981.

COMMITTEE ACHIEVEMENTS

1980-1981

CMA 055244

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COMMITTEE ACHIEVEMENTS

On September 28, 1981, PRASC forwarded the proposed "Policy for Regulatory Impact Analysis of Health, Safety and Environmental Regulations" to the CMA Executive Committee. This proposed policy exceeded the goals established by the Executive Committee in the PRASC charter. It more appropriately addresses all pertinent aspects of regulatory impact analysis of which public risk analysis is one component. A CMA position on regulatory impact analysis, instead of just public risk analysis, is important because of the potential impact of E.O. 12291. The policy was approved by the CMA Executive Committee and Board of Directors. See page 101.

Pending acceptance of the policy paper by the CMA Executive Committee and Board of Directors, PRASC had been developing an analytical framework for cost and risk analysis. Now that CMA policy has been established, PRASC will develop a set of analytical and data gathering techniques for use in regulatory impact analysis.

CMA 055245

POLICY FOR REGULATORY IMPACT ANALYSIS OF
HEALTH, SAFETY AND ENVIRONMENTAL REGULATIONS

Regulatory agencies should perform regulatory impact analyses to make government decision-making processes more effective.

Improved analysis at the beginning of a regulatory proposal will allow workable and effective rules to be in place sooner. Scientific, technical and economic issues should be examined before important decisions are made.

The following Guidelines are recommended:

- Regulations should be adopted when (1) a need for regulation has been demonstrated, (2) costs bear a reasonable relationship to benefits, and (3) the most cost effective approach is adopted.

Regulations should be adopted only where they will significantly reduce risk. Regulations should not be used to induce small changes or to reduce already minor risks. Justification for a regulation should be based on scientific data that clearly identify the hazard to be reduced and show to what extent the regulation will reduce the hazard.

The anticipated cost of a regulation should include both the direct costs of complying with it and its indirect costs throughout the economy. Similarly, the benefits to be included are the direct and indirect benefits of the regulation.

Finally, a regulation should take the least burdensome approach that will achieve its goals. Resources are wasted whenever a regulation imposes requirements not directly related to its objectives.

CMA 055246

- Regulatory impact analysis should not include quantification of intangibles in monetary terms.

Regulatory agencies should not place a dollar value on human life, other health effects such as pain and suffering, or aesthetics. Such quantification is not meaningful to society and the use of a mechanistic cost/benefit ratio for decision-making would be unwise. Regulatory impact analysis should provide decision-makers with as much information as practicable to ensure that regulations express human as well as economic values.

- Regulatory agencies should use "good science" in defining both the need for a regulation and the benefits in terms of risk reduction it will provide.

Agencies should use quantitative risk assessments that are based on substantial evidence. Unsupported assumptions or seriously flawed scientific studies form a poor basis for regulation.

Analyses should be reviewed by independent scientists as well as by agency scientists to ensure that the data are valid and that interpretations are correct.

- Regulatory agencies should evaluate alternative approaches to regulation.

Regulatory agencies should analyze the potential costs and benefits of reasonable alternatives for achieving regulatory goals. Non-regulatory approaches, such as economic incentives, can be more effective and less costly than regulations.

Agencies should also consider alternative methods of regulatory control. Such alternatives might include flexible compliance deadlines, performance standards, variances and exceptions.

GOALS AND OBJECTIVES

CMA 055248

PUBLIC RISK ANALYSIS SPECIAL COMMITTEE

GOALS, OBJECTIVES and RESULTS, 1980-81

1. Develop and recommend to the CMA Executive Committee and Board of Directors a chemical industry position on public risk analysis.

The goal was exceeded by developing a "Policy for Regulatory Impact Analysis of Health, Safety and Environmental Regulations".

2. Determine appropriate risk management techniques that CMA can advocate and use.

This goal was partially achieved by developing an analytical framework for cost and risk analysis.

Goals and Objectives 1981-82

1. Establish a new special committee for regulatory impact analysis. A draft charter has been prepared for Executive Committee approval;
2. Define and develop a data base for use by CMA in regulatory impact analysis. The goal will be accomplished by obtaining an existing data base and modifying it to meet CMA's needs;
3. Develop a prototype survey method and a test survey for the chemical industry. This will be achieved by reviewing other successful survey methodologies, and developing and maintaining a contact with appropriate company personnel to facilitate data collection;
4. Develop a set of analytical and data gathering techniques for regulatory impact analysis. This goal will be achieved by reviewing literature on regulatory impact analysis and adopting methods appropriate to the chemical industry.

CMA 055249

BUDGET

CMA 055250

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PUBLIC RISK ANALYSIS SPECIAL COMMITTEE

Budget Summary
FY 1980-1981

This activity started well into the fiscal year. It was determined that a separate budget would not be necessary for PRASC during FY 1980-81. Rather, expenses incurred would be funded from existing resources. It was not possible to make a reasonable estimate of expenses until sufficient experience could be gained by this new effort.

Budget Summary
FY 1981-1982

In FY 1981-82, the Board of Directors approved an increase in personnel of three staff, one secretary and two staff executives, to support the two newly created special committees--one on labeling and one on public risk assessment--and to help support existing task groups. Additionally, a \$48,000 research and consulting budget was approved for evaluating various options for risk/cost/benefit analysis. As of August 31, 1981, no research and consulting funds have been spent, rather analysis and model development have been conducted by members of the Public Risk Analysis Special Committee and CMA staff.

Projected Research and Consulting Budget
FY 1982-83

<u>Line Item</u>	<u>Projected Budget Requirement</u>
Database Development:	\$166,400
Survey Development:	\$ 83,200
Development of Analytical Techniques:	\$ 41,600
Total	\$291,200

* See attached background for budget projections.

CMA 055251

Background for PRASC

Projected Research and Consulting Budget
FY 1982-83

Database Development

2 manyears @ \$40/hr; 1 manyear = 2080 hours
2 (2080 hrs) (\$40/hr) = \$166,400

Survey Development

Development of prototype survey

1 manyear @ \$40/hr
(2080 hrs) (\$40/hr) = \$83,200

Development of Analytical Techniques

1/2 manyear @ \$40/hr = \$41,600

CMA 055252

Potential Problems and Proposed Solutions

1. Available data may not meet CMA needs in regulatory impact analysis.
Solution: Update and expand existing data through surveys and knowledgeable estimates.
2. Lead time for regulatory responses may not permit thorough analyses.
Solution: Examine regulatory agency contract proposals and task orders as well as statements by agency officials to determine the future course of regulatory activity.
3. Companies may be reluctant to divulge the information needed for regulatory impact analysis.
Solution: Close contact with responsible officers within the companies, encouragement of member companies by the Board of Directors, and strong assurances of confidentiality should increase the response rate.

CMA 055253

Strategy for the New Administration

PRASC has responded to Executive Order 12291 by developing a CMA policy for Regulatory Impact Analysis of Health, Safety and Environmental Regulations. The policy approved by the Board of Directors will be used by the committee to develop data and methods for regulatory impact analysis. Such analytical tools will enable CMA to determine if regulatory agencies are following the mandates of Executive Order 12291.

CMA 055254

SUMMARY OF RESOURCES
REQUIRED AND PROPOSED

CMA 055255

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SUMMARY OF RESOURCES
REQUIRED AND PROPOSED
FOR THE DIVISION

STAFF: .

The Division's 14 assigned personnel -- 7 staff executives, 6 secretaries and 1 work processor operator -- will be able to effectively handle normal workloads through May 31, 1982. Sufficient funds are also budgeted to handle peak loads by relying on outside consultants, temporary secretaries and overtime for support staff.

COMPANY RESOURCES:

The Reagan administration has caused CMA to shift its emphasis in comments and support documents provided to OSHA, EPA, OMB and Vice President Bush's Task Force on Regulatory Reform. Although our comments have been fundamentally legal briefs supported by technical examples, this administration places greatest emphasis on economic data and indepth scientific analyses supported by legal arguments. Such requirements increase demands on our committee and task group members, and on staff who collect and analyze data and who explain their findings in briefings with government officials. No increase in company travel requirements or frequency of committee meetings is expected. Instead, more work will be done at home.

COMMITTEES:

During FY 1981-1982, activities of the Public Risk Analysis Special Committee will increase dramatically, as will its staffing requirements. Simultaneously, OSHA is expected to promulgate its hazards communications standard. At that time, responsibilities of the Hazards Communications Special Committee should be transferred to the Occupational Safety and Health Committee and to the Government Relations State Activities Committee. Increased staff support for PRASC should be offset by reduced support to HCSC.

CMA 055256

APPENDIX A

BIOGRAPHIES OF EXEMPT STAFF ASSIGNED TO THE HEALTH, SAFETY AND CHEMICAL REGULATIONS DIVISION

Director HSCR - Gordon D. Strickland joined CMA on October 15, 1979. Prior to working with CMA he was a chief Bioenvironmental Engineer of the U.S. Air Force Occupational Environmental Health Laboratory, U.S. delegate to the Medicine in the Air Forces of the Americas (a committee of the system of Information and Cooperation of the Air Forces of the Western Hemisphere), and chairman of the Tri-Services Committee on Occupational and Environmental Health. Mr. Strickland holds a B.S. in Civil Engineering from the University of Arizona, an MPH from Johns Hopkins University and is a graduate, in Bioenvironmental Engineering, of the USAF School of Aerospace Medicine.

Associate Director HSCR - Randal P. Schumacher came to CMA from the Eastman Kodak Company, where he was a clinical toxicologist in the Health, Safety and Human Factors Laboratory. He received his undergraduate degree in biology from Roberts Wesleyan College in New York, and a graduate degree in toxicology from the University of Rochester. Mr. Schumacher is now studying for a law degree at the Columbus School of Law, Catholic University of America.

Associate Director HSCR - Rita Comotto (Bahner) came to CMA from EPA, where she was an environmental toxicologist (in the Environmental Review Division of the Office of Toxic Substances), responsible for test standards and test rules development under Section 4 of TSCA. Prior to her employment at EPA, Ms. Comotto was employed by Monsanto as a toxicologist. She received a B.A. in molecular biology from the University of Missouri and an M.S. in environmental quality, planning and policy analysis from Washington University. Ms. Comotto is also first vice chairman of ASTM's Pesticides Committee, E-35.

Associate Director HSCR - Milton T. Freifeld has been with CMA since December 1974. Prior to joining CMA, Mr. Freifeld worked as manager of R&D-polymers for the Tenneco Chemical Company. Mr. Freifeld holds a B.S. in Chemical Engineering from the City College of New York and an M.A. in Business Administration from Xavier University. Mr. Freifeld has also worked for Monsanto and GAF Corporation in the fields of biocides, food additives, cosmetics and adhesives, and has patents and publications in each of those fields.

CMA 055257

Associate Director HSCR - D. Christopher Cathcart came to CMA from the Department of Medicine and surgery of the Veterans Administration where he was a senior program analyst. Prior to that, he served as a health services administrator in the Medical Service Corps, United States Air Force. Mr. Cathcart is a political science graduate of West Point. He received his masters degree in business management at Central Michigan University and has completed postgraduate courses in health care administration at George Washington University.

Associate Director HSCR - Janet A. Steel came to CMA from a congressional commission on synthetic fuels where she was employed as a research analyst. Prior to her employment with the Commission, she worked as a staff assistant with the U.S. EPA Science Advisory Board and as a research associate with the National Cancer Institute. Ms. Steel received a B.S. in Biology from Dickinson College and has taken graduate course work in Science Policy from George Washington University.

Staff Executive HSCR - Timothy F. O'Leary joined CMA in September 1981. Previously he was an Assistant Project Manager and Economist with the TRW Energy Engineering Division. Prior to working at TRW, Mr. O'Leary was an economist with U.S. News and World Report. He received a B.A. in economics from Boston College and was awarded an M.A. in economics from the University of Massachusetts.

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