TO: R. D. Gamblin

FROM: T. G. Grumbles
DATE: September 14, 1990

Interoffice Communication

SUBJ: PROGRESS REPORT

VISTA

1. TGG participated in a meeting at R&D to review the final draft of the revised New Product Development Manual and begin plans for training on the revised procedures.

2. EPA is continuing efforts to move towards a "Product Stewardship" rulemaking under the TSCA rules umbrella. Content of the rule is very preliminary at this time but the EPA staff has indicated that there will be requirements for full life-cycle assessments on identified chemicals. The 313 list will probably be used as the initial screening list.

3. A conference call was held with SDA member companies to determine how to deal with EPA's recent indication that a formal delisting petition would be required to get "surfactant" range materials excluded from the 313 glycol ether definition. SDA counsels are preparing a detailed menu regarding our legal options. We are also working on an alternate glycol ether definition that could be proposed to EPA to exclude the surfactant materials.

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TGG: JCL: ERT: [redacted]: AJO: RF

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VISTA

September 14, 1990

Jeffrey S. Lee, Ph.D.
c/o Applied Industrial Hygiene, Inc.
6500 Glenway Avenue, Bldg. D-7
Cincinnati, Ohio 45211-4438

Re: **Manuscript No. 9038**

Dear Jeff:

I've reviewed the other reviewers review (did that make sense?) and have the following thoughts. I believe our thoughts on the quality of the paper were very similar with only a one number difference in our "scientific/technical merit" rating. I had more problems with the manuscript form and content but many of the general comments were the same.

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Please let me know what you want me to do.

Sincerely,

Thomas G. Grumbles, C.I.H.
Manager Environmental Affairs

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Question 15. In your experience, have CMA documents usually been submitted

	A	B	C	D	E-I	Total
Early	0	0	1	1	1	3
On Time	19	10	9	17	12	67
Late	0	1	0	1	0	2

Question 16. With regard to public expectations on issues, are CMA positions most often:

	A	B	C	D	E-I	Total
Ahead of Public expectations	3	2	2	0	2	9
In synch with public expectations	7	4	2	9	6	28
Behind Public expectations	9	5	6	7	7	34

Question 17. When compared to those of other industries, CMA positions are most often:

	A	B	C	D	E-I	Total
Less Progressive	1	0	0	2	0	3
Equally Progressive	8	8	4	7	6	33
More Progressive	10	3	6	7	8	34

Question 18. If you could give CMA one piece of advice to improve its regulatory advocacy, what would that be?

The most frequent responses were:

- early identification and involvement with issues
- more networking with other trade associations
- better communication with members (not more paper)
- more personal visits to agencies
- more member company involvement
- more direct outreach to members

Question 19. How could CMA obtain better input from small member companies?

The most frequent responses were:

- more meetings outside DC
- develop a participation requirement based on member size
- more member involvement
- closer relationship with SOCMA and CSMA
- more workshops
- develop polling system or short survey system
- establish small company forum/focus groups

Question 10. Is your company a member of other trade associations that conduct federal regulatory activity?

Responses are collected both as the average number of membership per size of firm and the most frequently mentioned associations.

	Firm Size				
	A	B	C	D	E-I
Average # of Memberships	8.8	7.3	3.9	2.4	2.6

Question 11. How would you rate CMA's regulatory advocacy effectiveness in each issue area?

Responses are graded based on the first and second most frequent response. A single mark is assigned for responses in excess of 80%. The response categories are: H = High, A = Average, L = Low, N = No Idea.

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	A	B	C	D	E-I
Overall	AH	AH	AH	AH	AH
Environmental	AH	AH	HA	HA	HA
Health & Safety	AH	AH	AH	HA	AH
Distribution	AH	A	AH	AH	AH
Energy	LA	AN	A	AL	AL

Question 12. Is CMA's regulatory advocacy on par with other trade associations?

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	Size Firm				
	A	B	C	D	E-I
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Health and Safety	BE	EL	EB	BE	EB
Distribution	BE	EL	EB	EB	EB
Energy	EL	NE	NE	EB	EN
Overall	EB	EB	BE	EB	BE

Question 4. If your company did not participate in regulatory advocacy, either through or for CMA, for any issue areas listed below, please indicate that what barriers exist for your company's participation.

Responses on this question were limited to the firms not conducting federal regulatory activities, therefore, only nine companies responded. Of those, the most frequent responses were:

1) Limited company resources
2) Participate in other trade groups
3) Viewed as a "big company" task.

Question 5. What are the barriers to providing additional company staff for CMA related federal regulatory advocacy?

Responders indicated that they did not have personnel with sufficient time available to conduct more advocacy. Many also indicated that they did not see a clear return on their investment for more advocacy efforts.

Question 6. What is your perception of how CMA currently sets priorities on selected issues and how should they set priorities for regulatory advocacy?

Responses were not very different from group to group, in general, the members said that in the current system CMA sets priorities as follows:

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2) Issues with large economic impact on industry have the highest priority
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All categories of firms agreed that the following factors were the correct ones for setting priorities.

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Question 7. What parts of the regulatory advocacy process are most important and which ones should CMA emphasize more?

Responses were consistent among the categories of firms with the following as the top 5 responses on the most important parts of the regulatory process:

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VVV 000013744

Respondents said that CMA should emphasize more of the following elements:

1) Staff and company visits to agency to inform of CMA positions.
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REGULATORY ADVOCACY SURVEY
SUMMARY OF MEMBER COMPANY RESPONSES

The following is a summary of the responses to a survey of all member companies designed to determine their activities in federal regulatory advocacy. The overall response rate was 50%. The response rate for companies with chemical sales in excess of $100 million was 71%. For companies with sales of less than $100 million, the response rate was 21%. In order to determine differences in levels of effort and opinions, many of the responses are categorized by size of firm. For ease in reading the companies are categorized as:

	Chemical Sales In Millions
Size A	>$2,000
Size B	1,000 - 2,000
Size C	400 - 1,000
Size D	100 - 400
Size E	50 - 100
Size F	25 - 50
Size G	10 - 25
Size H	10 - 15
Size I	< 10

VVV 000013742

Size E through I were aggregated in this summary to keep the groupings of roughly equal size.

Question 1. Does your company conduct federal regulatory advocacy?

Of all respondents, 78 firms indicated that they conducted federal regulatory activity. Eight firms responding indicated they did not participate in federal regulatory advocacy.

Responses are summarized by the numbers of individuals in each category for each grouping of companies. The numbers in parenthesis are the average number of individuals in each category per company. The categories are 5-20%, 20-50% and >50% of an individual's time.

	5-20%	20-50%	>50%
Size A	412 (19)	68 (3)	35 (2)
Size B	119 (10)	21 (2)	7 (1)
Size C	71 (6)	18 (2)	7 (1)
Size D	86 (4)	16 (1)	4 (0.2)
Size E-I	14 (1)	3 (0.2)	2 (0.1)
Total	702	126	55

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Total	702	126	55

Question 2. Does your company measure success in federal regulatory advocacy?

Almost all responses were affirmative, and most all indicated the measure of success was the degree to which the agency took our comments into account in the final regulations.

Question 3. For federal regulatory advocacy that you conducted through or for CMA in the past year, please indicate the number of persons involved by agency and by the approximate percentage of time those persons spend.

Responses are summarized by size with the total number of individuals in each group and the average number of individuals per company in parenthesis immediately following the group totals. See Figure 1.

	5-20%	20-50%	>50%
o Size A firms:			
Environmental	153(6.9)	25(1)	17(1)
OSH	93(4)	20(0.8)	5(0.3)
Distribution	45(2)	5(0.3)	0.2(0.1)
Energy	19(1)	2(0.1)	2(0.1)
Other	20(1)	3(0.2)	2(0.1)
o Size B firms:			
Environmental	33(2.4)	6.5(0.5)	2(0.15)
OSH	21(1.5)	1(0.08)	0
Distribution	22(1.5)	2(0.15)	0
Energy	9(0.7)	0	0
Other	2(0.15)	1(0.08)	0
o Size C firms:			
Environmental	19(1.6)	8(0.7)	2(0.18)
OSH	15(1.3)	7(0.6)	1(0.09)
Distribution	6(0.45)	1(0.09)	1(0.09)
Energy	1(0.09)	1(0.09)	0
Other	0	0	0
o Size D firms:			
Environmental	41(1.7)	6(0.3)	0
OSH	20(1)	2(0.1)	1(0.1)
Distribution	12(0.5)	1(0.1)	0
Energy	4(0.1)	0	0
Other	4(0.1)	1(0.1)	1(0.1)
o Size E-I firms:			
Environmental	5(0.6)	3(0.5)	0
OSH	2(0.4)	1(0.1)	0
Distribution	3(0.5)	3(0.5)	0
Energy	0	0	0
Other	0	1(0.1)	0
Total:	548	99.5	34

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VVV 0000137444

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4) Coordinate the Industry position with others
5) Collect information about the chemical industry to support advocacy

Question 8. How effective are CMA communications with the regulatory agencies?

Responses are given by firm size groups with the top ranked choices for each category as follows: L = Limited, G = Good, P = Poor

	Firm Size				
	A	B	C	D	E-I
Environmental	GL	GL	LG	GL	GP
Health & Safety	LG	LG	L	GL	LG
Distribution	LG	GL	LG	GL	L
Energy	LG	LG	LG	GL	LP

Question 9. Please rate the effectiveness of the following groups in conducting federal regulatory advocacy.

Responses were rated as the 1st and 2nd most frequent response as follows: (a single mark was given when more than 75% of the responses were the same) H = High, A = Average, L = Least Effective, X = Don't Know

	A	B	C	D	E-I
Public Interest Research Group	AH	AH	X	XA	AH
American Petroleum Institute	A	AH	AH	AH	AH
Citizen Labor & Energy Coalition	X	X	X	X	X
National Association of Manufacturers	A	AH	A	AH	AH
Chemical Manufacturers Association	AH	AH	A	AH	HA
National Resources Defense Council	H	H	HA	HA	HA
National Wildlife Federation	AH	HA	HA	HA	HA
Consumers Federation of America	AX	AH	AH	XA	X
Syn. Organization Chem. Man. Assoc.	A	A	A	AH	AH
Electricity Cons. Res. Council	XA	X	X	X	X
Coalition to Oppose Energy Taxes	XA	X	X	X	X
Chemical Specialty Man. Association	AL	AL	AL	XL	AX
American Paper Institute	AX	A	AH	XH	XL
U.S. Chamber	AL	AL	LA	AH	AL
American Industrial Health Council	AH	A	AL	XA	XL
American Institute of Chemical Eng.	AL	LA	LA	LA	AL
Association of American Railroads	AH	HA	AH	XA	AL
Environmental Defense Fund	HA	HA	HA	HA	HA
Sierra Club	HA	HA	HA	HA	HA
American Trucking Associations	AH	AH	AH	LA	XL
Petrochemical Ener. Group	XL	X	X	XA	XL
Process Gas Consumers	XA	X	X	XA	XL
National Agri. Chemical Association	AH	AH	X	XA	XA
AFL/CIO	AH	AH	HA	HA	HA

VVV 000013745

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Distribution	AH	A	AH	AH	AH
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	Size Firm				
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Environmental	BE	BE	BE	BE	BE
Health and Safety	BE	EL	EB	BE	EB
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Energy	EL	NE	NE	EB	EN
Overall	EB	EB	BE	EB	BE

Question 13. In your opinion, what would improve CMA's regulatory advocacy?

Responses are marked with the first and second most frequent response except when one response was marked more than 80% of the time. Responses allowed were: H = High Need, M = Medium Need, L = Low Need.

	Firm Size				
	A	B	C	D	E-I
More Member Company Participation	HM	MM	H	HM	HM
Better Member Company Training	MH	MH	MH	MH	MH
More Professional Staff Support	M	LM	LM	LM	LM
More Board Level Involvement	LM	ML	HM	MH	LM
More Support Staff	ML	L	LM	LM	LM
Better Staff Training	LM	ML	LM	LM	ML
More Outside Consulting Services	LM	L	L	LM	L
More Data From Companies	HM	MH	MH	LM	HM
More Information about Early Agency Efforts	HM	H	HM	HM	HM
More Networking with other Trade Associations	M	HM	HM	HM	HM
More Networking with Professional Societies	ML	MH	ML	HM	M
More Outreach to Academics	ML	ML	M	MH	LM
More Seminars and Workshops for Company Personnel	ML	ML	LM	MH	HM
More Regulatory Economics Capability	MH	MH	M	ML	LM
Better Coordination Between Committees and Task Groups	MH	ML	M	M	ML

Question 14. At what stages of regulatory development can you normally expect CMA to become involved?

	Firm Size					
	A	B	C	D	E-I	Total
Preproposal	12	4	3	13	11	43
Proposal	6	7	7	7	4	31
Post Proposal	1	0	0	0	0	1
Litigation/Settlement	0	0	0	0	0	0

VVV 000013747

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