

SUMMARY OF DIVISION ACTIVITIES

Scope of Environmental Programs

The Environmental Division's 1981-1982 year was full, diversified, and productive. The division effectively managed a broad spectrum of environmental issues before regulatory agencies and assisted in advocacy before Congress and the federal courts. In addition, a greater commitment was made to assist in the rapidly expanding CMA State Affairs program.

The Division's program covers the complete spectrum of environmental issues including air, water, solid/hazardous wastes, Superfund, and ground-water/drinking water matters. The program matches staff and member company resources and balances the Environmental Management Committee's (EMC) priorities with existing staff personnel.

In all program areas, the Environmental Division staff initiated and/or maintained closer working relationships with the Environmental Protection Agency (EPA) at earlier stages in the regulatory process. We are increasingly able to affect changes during regulatory development. We established closer coordination with other CMA departments to more effectively implement chemical industry priorities. This included preparing testimony, press releases, and participating in a number of media tours.

In addition, we continued to cooperate with other trade associations and interest groups in an effort to build coalitions and cost effectively advocate industry-wide positions.

Environmental Program Accomplishments

The past year several major CMA/EMC accomplishments were managed by the Environmental Division. Details of the accomplishments are set forth beginning on page D-7. Highlights of these accomplishments include:

- o After three years of extensive negotiations, CMA, EPA, and other parties concluded a settlement agreement on 37 of 54 issues raised as part of litigation challenging the National Pollutant Discharge Elimination System (NPDES) implementing regulations. The settlement agreement is highly favorable to industry and will result in effective control of our discharges to the nation's waters.
- o Over the last year and a half, CMA managed a cooperative study with EPA to determine the removal efficiency of toxic organic pollutants by existing chemical industry biological treatment facilities. The consultants' report of the study concluded that well-designed and operated biological treatment, in-place, is doing an excellent job in removing toxic organic pollutants from chemical wastewaters (i.e., over 86 percent removal). CMA developed a radio show and TV news feature about the report and has conducted seven media tours on water.

- o CMA continued a major resource-intensive effort, in conjunction with the Government Relations Committee, to have the Clean Air Act amended. Amendments are necessary to obtain relief from bureaucratic and cost-ineffective requirements presently in the Act. It is difficult to predict when and in what form such amendments will be enacted. In addition, we worked with the Communications Committee to provide spokesmen for clean air media tours in 24 cities.
- o CMA has participated extensively in discussions with EPA and other concerned parties over EPA's implementing regulations for Subpart C of RCRA concerning hazardous wastes. Over the past year, the EMC's efforts have begun to bear fruit. EPA now recognizes the chemical industry's concern that the regulatory system not be a disincentive to internal reuse and recycling of wastes, and will revise its definition of solid waste to essentially exclude such wastes from the hazardous waste system. And, EPA has revised the mixture rule by redefining which wastewater streams are hazardous, thereby removing 1385 chemical industry surface impoundments from the system. Industry's approach will result in effective reduction in hazardous waste and more effective use of by-products in waste streams.
- o We managed the preparation and publication of a major work on waste site management entitled "A Hazardous Waste Site Management Plan." The document is designed to aid those responsible for an inactive disposal site in developing a plan for its clean up, and to assist in mitigating any potential or actual adverse environmental effects. The site management plan is used by member companies and federal and state agencies as a management tool to resolve health and/or environmental problems created by hazardous wastes in inactive disposal sites.
- o Superfund and its implementation has been an exceedingly high priority issue for the chemical industry. The resource commitment we made to obtain a reasonable implementation of Superfund has definitely been a cost-effective decision. EPA's final revisions to the National Contingency Plan are consistent with the positions that CMA advocated. Although several significant issues still remain to be addressed, the CMA advocacy effort has assured that EPA implementation of the Superfund program is reasonable. The Environmental Division supported a communications effort on hazardous waste which included hazardous waste reports, press back-grounders and media tours in 24 cities.

Member Company Resources

The technical and legal expertise of 275 people from 62 member companies is currently being tapped to achieve the goals of the EMC. Compared to one year ago, the number of member companies contributing resources has decreased nine percent and the number of member company personnel on committees, task

groups, and work groups has decreased two percent. The number of assignments undertaken by member company personnel, however, has increased one percent. These figures reflect the tight economic conditions of the past year. The relatively small cutback reflects the cost-effective nature of member companies working through CMA to advocate important issues and positions. A comparable commitment will be required to achieve the Committee's goals over the next year.

Environmental Division Resources

The Environmental Division consists of seven dedicated professionals and five hard-working support staff. During the next year, the Division will need to maintain at least the same level of resources to handle the continuing demand for administrative services and to fulfill the goals of the Committee.

The Environmental Division staff is supported by the equivalent of two and one half attorneys from the Legal Department, two professionals from the Government Relations Department, and assistance from the Communications Department on an "as needed" basis. During the next year we expect to require at least the same level of support from the Government Relations, Communications and Legal Departments in light of numerous on-going complex and intensive legal, regulatory and legislative activities.

Education Programs

As in past years, we sponsored two Environmental Update programs that were well-attended and successful in informing member company personnel of what the EMC/CMA are doing in all program areas and of future plans. The November 1981 Update, held in Philadelphia, was an overview of all committee/task group activities. The May 1982 Update featured workshops on water permits, RCRA regulations/litigation, and Superfund.

In addition to the Updates, we sponsored: (1) an environmental review (audits) information exchange in January 1982, in Atlanta, Georgia, (2) a seminar on water quality criteria and standards, in conjunction with the State Affairs Division in May 1982, and (3) a workshop on hazardous waste technology in February 1982.

Environmental Division Research and Consulting Budget

The FY 81/82 budget for research and consulting was \$587,800. The Division managed a variety of air, water, and solid waste projects being used in CMA's advocacy programs. Actual expenditures for FY 81/82 totaled \$583,857. The research and consulting budget for FY 82/83 is \$300,000.

Program Outlook

Although it might seem that there should be a trend toward decreasing activity in the environmental arena, that is not the case. EPA staff are

slowly adopting some of the messages espoused by top Agency administrators. Our continued input to EPA is required to guarantee progress. During this time that is generally viewed as more cooperative than adversarial, all levels at the Agency are requesting industry input to their programs. A positive response by industry will require even more member company and staff resources than in the past. Our continued regulatory efforts can result in more cost-effective regulations for industry that can also result in a substantially improved environment.

The Environmental Division, in support of the EMC, will be challenged during the next year to respond to the EPA and to adequately support legislative and judicial issues as they arise. We will need resources to respond to possible amendments to the Clean Air Act, Clean Water Act, Resource Conservation and Recovery Act, and the Safe Drinking Water Act. There may be litigation related to the Comprehensive Environmental Response, Compensation and Liability Act (Superfund), and many familiar environmental issues will become important at the state level. We will, therefore, be in a continuous process of setting priorities and concentrating our resources where they will have the greatest likelihood of positive impact.

COMMITTEE/TASK GROUP ORGANIZATION

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 identifies and effectively manages environmental issues of significance to the chemical industry. Specific objectives include:

- o advocating responsible environmental legislation and regulation, which consider economic impacts, energy implications, cost-effectiveness, risks, and benefits;
- o seeking relief from unreasonable legislation and regulation;
- o sponsoring research on environmental issues of widespread interest to the industry; and
- o helping member companies understand their environmental responsibilities.

The 15 member Committee directs its program through 19 issue-oriented task groups and 29 work groups organized into five program areas. Each program area is coordinated by a Committee member in conjunction with CMA staff. Committee members also serve as Sponsors for one or more task groups. The partnership of Sponsor, Task Group Leader and CMA Staff Executive effectively manages 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 strengthen to meet an array of difficult challenges.

ENVIRONMENTAL MANAGEMENT COMMITTEE

Committee Programs/Membership

<u>Program Area</u>	<u>Committee Coordinator</u>	<u>No. of Task Groups</u>	<u>CMA Staff Representatives</u>
Air	L. D. Johnson	5	J. S. Matey W. P. Gullledge
Water	P. H. Fournet	6	R. R. Romano W. P. Gullledge
Solid Waste Regulatory	R. J. Reichert	2	C. W. Compton J. J. Mayhew W. P. Gullledge
Hazardous Waste Management	C. L. Sercu	4	J. J. Mayhew C. W. Compton
General	VACANT	3	D. W. Carroll W. P. Gullledge C. W. Compton

Committee Membership

Term Ending May 31, 1983:

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

Term Ending May 31, 1984:

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

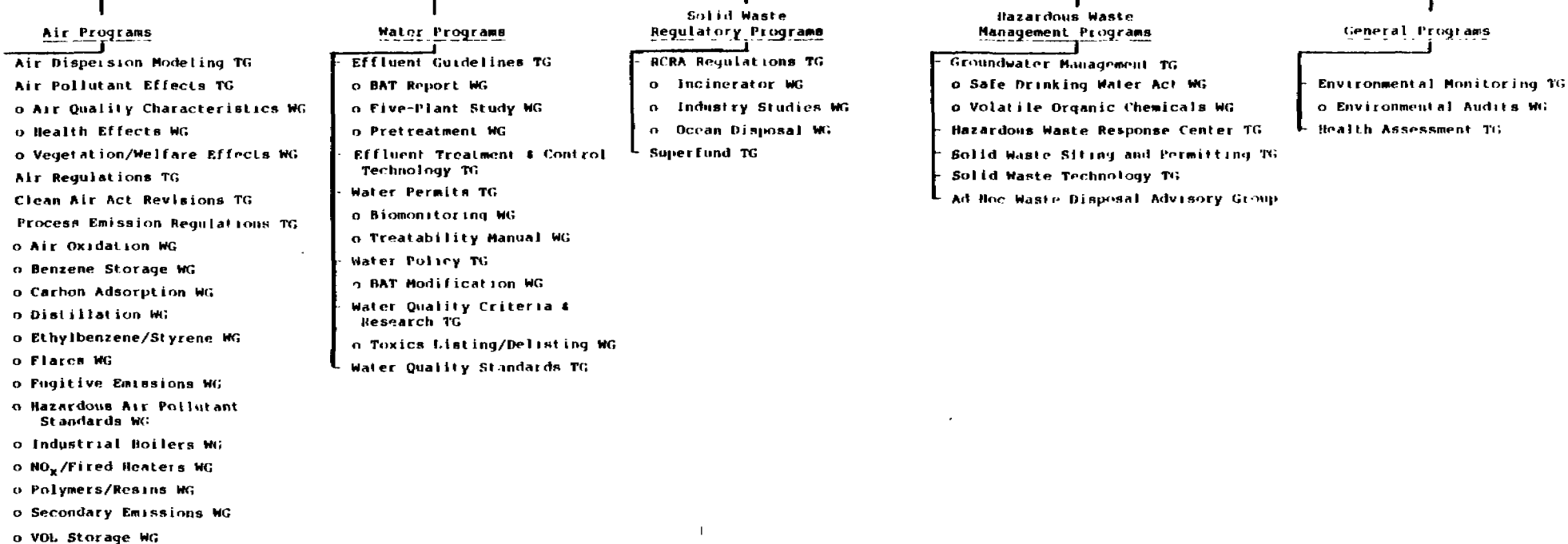
Term Ending May 31, 1985:

F. D. Bess.	Union Carbide Corporation
K. Fry	BASF Wyandotte Corporation
T. M. Hellman	Allied Corporation
J. A. Morovitz	Exxon Chemical Americas
C. L. Sercu	Dow Chemical USA
D. W. Carroll	CMA Staff Executive
A. R. Mayer	CMA Program Coordinator

*Through May 31, 1983

ENVIRONMENTAL MANAGEMENT COMMITTEE

PROGRAM/PRIORITIES SUBCOMMITTEE



TG = Task Group

WG = Work Group

September 1, 1982

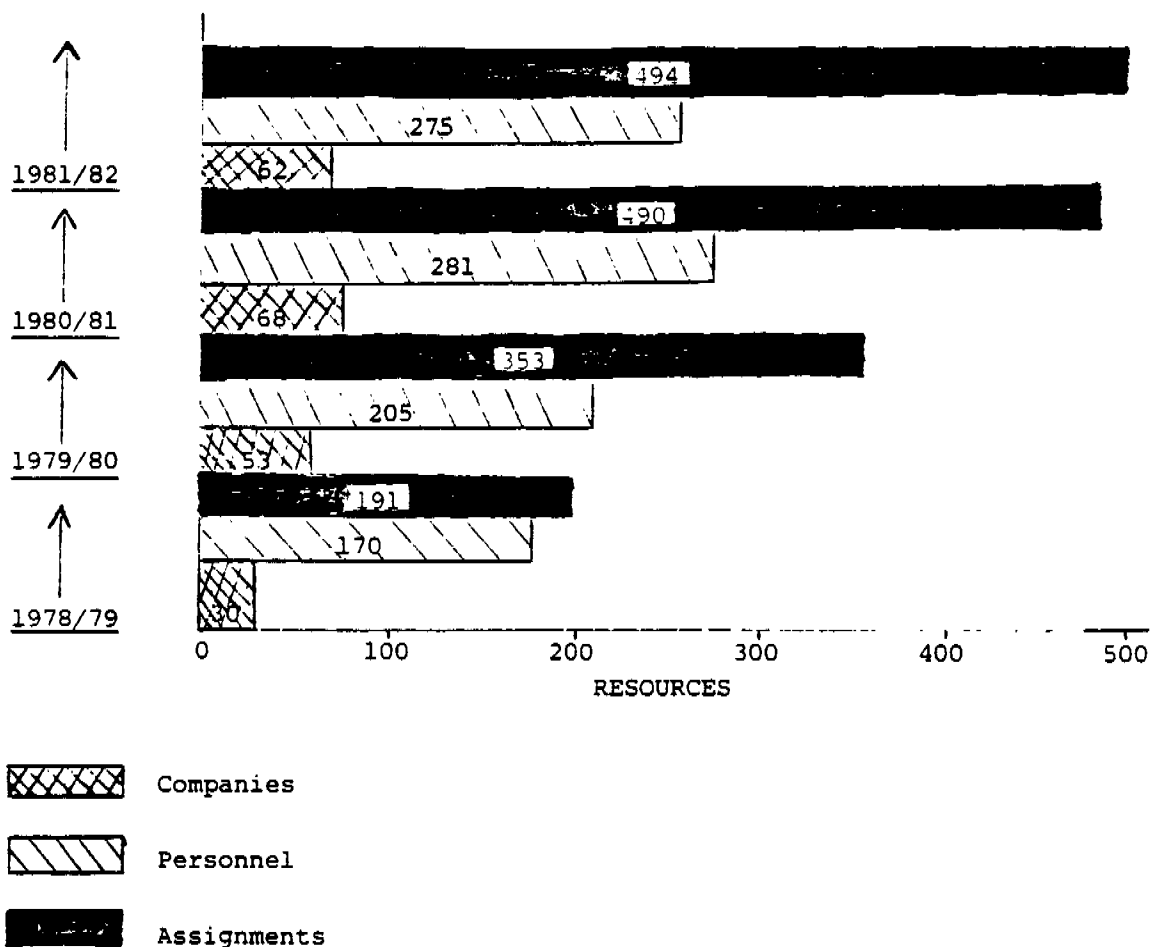
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RESOURCE ANALYSIS

Member Company Resources

The technical and legal expertise of 275 people from 62 member companies is currently being tapped to achieve the goals of the EMC (see page D-101). Compared to one year ago, the number of member companies contributing resources has decreased nine percent and the number of member company personnel on committees, task groups, and work groups has decreased two percent. The number of assignments undertaken by member company personnel has increased one percent. These figures reflect the tight economic conditions of the past year. The relatively small cutback, however, reflects the cost-effective nature of member companies working through CMA to advocate important issues and positions. A comparable commitment will be required to achieve the Committee's goals over the next year.

The following graph sets forth the trends of resource commitments from 1978 to 1982, for member company representation, number of personnel, and number of assignments.



Company Breakdown

ENVIRONMENTAL MANAGEMENT COMMITTEE

MEMBER COMPANY RESOURCES

(Committee/Task Group/Work Group Assignments)

<u>Company</u>	<u>No. of People</u>	<u>No. of Assignments</u>
Air Products & Chemicals Inc.	2	3
Allied Corporation	13	22
American Hoechst Corporation	2	2
American Cyanamid Company	6	9
Amoco Chemicals Corporation	6	11
ARCO Chemical Company (Anaconda and Oxirane)	8	15
Ashland Chemical Company	2	4
BASF Wyandotte Corporation	1	2
Borg-Warner Chemicals	1	1
Cabot Corporation	1	1
Celanese Corporation	2	3
CIBA-GEIGY Corporation	1	5
Conoco Chemicals Company	3	4
Cosden Oil & Chemical Company	1	1
Diamond Shamrock Corporation	4	10
Dow Chemical Company	25	56
E. I. Du Pont de Nemours & Company	26	46
Tennessee Eastman Company (Eastman Kodak & Texas Eastman)	13	33
El Paso Products Company	1	1
Essex Chemical Corporation	1	1
Ethyl Corporation	1	1
Exxon Chemical Americas	5	14
FMC Corporation	6	13
General Electric Company	1	1
Georgia Pacific Corporation	1	1
W. R. Grace Company	2	3
Gulf Oil Chemicals Company	4	4
Hooker Chemical Corporation (Occidental Chemical)	6	14
ICI Americas Inc.	6	6
Kaiser Aluminum & Chemical Company	2	4
Koppers Company Inc.	1	1
The Lubrizol Corporation	1	1
Mallinckrodt Inc.	2	2
Merck & Company (Calgon)	2	2
3M Company	1	1
Mobay Chemical Corporation	3	9
Mobil Chemical Company	5	6
Monsanto Company	23	45
Nalco Chemical Company	2	2
NL Industries Inc.	1	1
Olin Corporation	7	7
Polysar Gulf Coast	1	1
PPG Industries Inc.	3	3
PQ Corporation	1	1
The Procter & Gamble Company	6	12
Reynolds Metals Company	1	2
Rohm and Haas Company	5	12
Shell Chemical Company	12	18
Stauffer Chemical Company	14	30
Sun Refining & Marketing Company	1	1
Texaco Chemical Company	1	1
Union Carbide Corporation	21	37
Uniroyal Chemical Company	2	2
Velsicol Chemical Corporation	2	2
Vulcan Materials Company	1	1
62 Companies	275	494

CMA Staff Resources

The Environmental Division consists of seven professionals and five supporting staff. During the next year, the Division will need to maintain at least the same level of resources to handle the continuing demand for administrative services and to fulfill the goals of the Committee.

Additional CMA staff associated with EMC activities include the equivalent of two and one half attorneys from the Legal Department, two professionals from the Government Relations Department, and assistance from the Communications Department on an "as needed" basis. During the next year we expect to require at least the same level of support from the Government Relations, Communications and Legal Departments in light of numerous on-going complex and intensive legal, regulatory and legislative activities.

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 1981, 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, American Bar Association.

Carolyn W. Compton, Manager, Special Environmental Programs

Ms. Compton is a graduate of the University of Oklahoma and the Philadelphia College of Textiles and Science. She worked for Sohio Petroleum Company, Shell Oil Company and the University of Texas as a geological/geophysical draftsman. Subsequently she worked as an industrial engineer for J.P. Stevens Co., Inc. She came to CMA from E. I. du Pont de Nemours and Co., Inc., where she was a production supervisor of a titanium dioxide facility.

William P. Gullledge, Manager, Environmental/Scientific Programs

Mr. Gullledge is a graduate of the American University with a B.A. in political science and a M.S. in Environmental Engineering. He has worked as an environmental scientist at Engineering-Science on a variety of energy and environmental programs. He has worked at the Department of Energy and came to CMA from the Tennessee Valley Authority where he was an environmental engineer working on solid waste matters.

Janet S. Matey, Manager, Air Programs

Ms. Matey received her bachelors degree in environmental science from Rutgers University 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 and personnel placement. She worked for a property management firm, executive placement agency, and a foreign embassy. Within CMA Ms. Mayer previously worked with the Engineering Committee and Subscribed Special Projects.

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 preparing 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 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.

Environmental Management Committee

Research & Consulting Budget

	FY 81/82 Board Approved Budget	Paid FY 81/82
<u>Air Programs</u>		
Air Pollutant Effects:	\$65,000	
HAOS reanalysis - SRI International		\$75,600
2 Peer reviews of SRI project		8,119
EPA Ozone meeting/presentation		3,946
Process Emission Regulations:	82,800	
Air oxidation document review - Washington University		42,063
Process Emission Regulations:		
Flares study - Engineering-Science		36,990
Clean Air Act Revisions	12,200	
	<u>\$160,000</u>	<u>\$166,718</u>
<u>Water Programs</u>		
Water Quality Criteria & Research:	133,900	
Aquatic Research		
Phase I - HydroQual completion		3,000
Phase I - North Texas State University completion		3,360
Phase II - HydroQual, Inc		60,000
Phase II - North Texas State University		60,000
Phase II - Eco-Tech, Inc.		19,983
Aquatic Research Peer Review		4,227
Effluent Guidelines: 5-Plant Study	37,200	
5-Plant Samples - Radian Corporation		30,123
5-Plant Final Report - Engineering- Science		21,130
Water Policy: CWA PR Projects		
Water Quality Criteria case histories - Environmental Research & Tech., Inc.		10,505
BAT cost estimate - Peat, Marwick & Mitchell		14,700
Water Quality Standards: Priority		24,000
Pollutants in receiving streams - Environmental Resource Mgmt., Inc.		
Effluent Guidelines:		
Analysis of Pretreatment RIA - Environmental Research & Tech., Inc.		40,107
BAT for Toxics	29,800	
Effluent Guidelines BAT	44,600	
Emission Criteria	22,300	
	<u>\$267,800</u>	<u>\$291,135</u>

	<u>FY 81/82 Board Approved Budget</u>	<u>Paid FY 81/82</u>
<u>Solid Waste Programs</u>		
Groundwater Mgt.: Test CMA position - P. E. LaMoreaux & Associates	\$25,900	\$39,850
RCRA Regulations: Document review	32,300	
GeoTrans - SW-868 + SW-869 (final payment)		1,386
Law Engineering Testing Co. - seismic criteria (final payment)		1,703
Solid Waste Technology: Landfill vs. Incineration - Engineering-Science	19,400	39,500
Siting & Permitting: CAL OAT Document Review - Meredith/Boli & Associates		5,000
Hazardous Waste Siting Conference - joint sponsorship	\$77,600	5,000
		<u>\$92,439</u>
<u>Superfund Programs</u>		
Superfund Consultants	\$32,400	
Section 105/106 (final Payment) - A. D. Little		3,000
Pre-screening model - A. D. Little		11,250
Alternative to Mitre Model - A. D. Little		18,749
	<u>\$32,400</u>	<u>\$32,999</u>
<u>General Programs</u>		
Environmental Economics	\$10,500	
Environmental Monitoring - RCRA	26,300	
Environmental Monitoring - lab certification	13,200	
Dr. John Hernandez - EMC meeting		566
	<u>\$50,000</u>	<u>\$ 566</u>
 <u>TOTAL</u>	 <u>\$587,800</u>	 <u>\$583,857</u>

1981-82
RESEARCH/CONSULTING BUDGET EXPENDITURES*

AIR PROGRAMS - \$167M

SRI International - \$76M

Second year/completion of a 2-year project. The contractor reanalyzed the health and environmental data bases developed during the Houston Area Oxidants Study (HAOS). CMA's objective: to persuade EPA to use the results of this study in revising the national ambient air quality standard for ozone.

Washington University - \$42M

The contractor evaluated background information and proposals and developed in-depth cost and operational information on control systems, etc., concerning the development of a new source performance standard and control techniques guideline for air oxidation processes. The study was used in written comments submitted by CMA to the Agency.

Engineering-Science - \$37M

Initial segment of a \$87M project that will continue into FY 82/83. The contractor will evaluate flare efficiency to demonstrate whether flares are appropriate and cost-effective control devices for purposes of Clean Air Act regulation.

Dr. Robert E. Carroll, Dallas Evans, Dr. Alice Whittemore - \$8M

CMA conducted peer reviews of the SRI International HAOS reanalysis in July and October 1981. Valuable suggestions were made for the successful completion of the project.

Ozone Meeting - \$4M

CMA sponsored a report on the results of the EMC-funded reanalysis of the HAOS data at the March 1982 International Symposium on the Biomedical Effects of Ozone and Related Photochemical Oxidants.

*All figures rounded to the nearest thousand.

WATER PROGRAMS - \$291M

North Texas State University - \$63M
HydroQual, Inc. - \$63M

The contractors completed a three-year project that produced a mathematical model that assesses the fate of added pollutants. The model offers advantages in simplicity over past approaches and could be incorporated into future EPA guidance/regulatory programs.

Environmental Research & Technology, Inc. - \$40M

The contractor analyzed EPA's Pretreatment Regulatory Impact Analysis. The study provides technical support for CMA's legislative and regulatory positions on pretreatment.

Radian Corporation - \$30M
Engineering-Science - \$21M

Radian Corporation analyzed water samples and Engineering-Science prepared the final report on the joint CMA/EPA five-plant study on toxic organic pollutants. The report shows that well-designed and operated biological treatment facilities are effective in removing most toxic organic pollutants, and presents detailed data on the uncertainty of analyzing for these pollutants. The report is being widely publicized.

Environmental Resources Management, Inc. - \$24M

ERM performed an assessment of existing priority pollutant data in U.S. receiving streams. The report will be used in discussions with EPA on various water regulatory programs.

Eco-Tech, Inc. - \$20M

Eco-Tech evaluated CMA's North Texas State University/HydroQual aquatic modeling project and contributed to the formal peer review of the project.

Peat, Marwick, Mitchell & Co. - \$15M

The contractor evaluated EPA's best available technology economically achievable (BAT) cost estimates. The study findings will be incorporated in CMA Clean Water Act public relations projects and in CMA testimony for Clean Water Act hearings.

Environmental Research & Technology, Inc. - \$11M

ERT developed water quality criteria case histories to be used in CMA advocacy of the Clean Water Act Amendments.

Gary E. Blau, Dr. Don Mackay, Thomas O. Peyton - \$4M

CMA conducted a peer review of its aquatic modeling project. Valuable insight was contributed by these modeling experts.

SOLID WASTE PROGRAMS - \$93M

P. E. LaMoreaux & Associates - \$40M

Second year of a contract begun in FY 80/81. The contractor did preliminary work to develop a model groundwater classification scheme based on CMA's proposed groundwater policy.

Engineering-Science - \$40M

The contractor prepared a comparison of factors to be used in deciding to build a landfill versus an incinerator for disposal of specific hazardous wastes. The report has been widely distributed.

Meredith/Boli & Associates - \$5M

The contractor critiqued a California OAT report and a related state executive order proposing a ban on landfills for hazardous waste disposal. The report was used in testimony at California congressional hearings.

Hazardous Waste Siting Conferences - \$5M

CMA funded a series of conferences on hazardous waste siting with the Edison Electric Institute, American Petroleum Institute, National Solid Waste Management Association, American Paper Institute, National Conference of State Legislatures, and National Governor's Association.

Law Engineering Testing Company - \$2M GeoTrans - \$1M

Final payments on two contracts which were for the review of documents in conjunction with RCRA Regulations Task Group comment preparation. Both studies were used last year.

SUPERFUND PROGRAMS - \$33M

A. D. Little, Inc. - \$33M

A. D. Little assisted the Superfund Task Group in developing a prescreening model and substantive improvements to the Mitre Model. This project contributed significantly to CMA's advocacy and success in achieving an acceptable National Contingency Plan.

FY 82/83
APPROVED RESEARCH & CONSULTING BUDGET

	<u>Project Total</u>	<u>Program Total</u>
<u>AIR PROGRAMS</u>		
Complete the study of the hydrocarbon destruction efficiency of propylene flares begun in FY 81/82	\$ 50,000	
		\$ 50,000
<u>WATER PROGRAMS</u>		
Analysis of CMA/EPA cooperative study on biotreatment at selected sites	15,000	
Technical review of BAT document for effluent guidelines	40,000	
		55,000
<u>SOLID WASTE REGULATORY PROGRAMS</u>		
Evaluate EPA's Best Engineering Judgement document for impoundment and landfill design	30,000	
Evaluate Superfund models and cleanup guidelines	45,000	
		75,000
<u>HAZARDOUS WASTE MANAGEMENT PROGRAMS</u>		
Determine parameters of incinerator stack emissions	25,000	
Develop new data in landfill design, operation, and safety	50,000	
		75,000
<u>GENERAL PROGRAMS</u>		
Evaluate existing sampling and analysis methods for groundwater monitoring	25,000	
Prepare a protocol for the analysis of sludge/solid samples	20,000	
		45,000
TOTAL		<u>\$300,000</u>

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 and manages most of a program area. Because the air, water, and solid waste programs are too large for one staff person to manage, one individual handles multi-media assignments to balance work loads and assure that qualified back-up support is available for all programs.

Over the past year, the Environmental Division has concentrated on 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 coordination includes preparing testimony and providing background materials to the Government Relations Department, including the State Affairs Division, and providing and reviewing materials for press releases and public relations/Communications Department projects. In addition, all staff executives closely coordinate their programs with Legal Department staff and, when appropriate, with outside counsel. This coordination also serves to improve communications and coordination among the various standing committees that are interested in a topic.

NEW ISSUES 1982-83

AIR PROGRAMS

Legislative

- o Clean Air Act Amendments - The Clean Air Act Revisions Task Group will continue to support the Government Relations Committee by providing policy analyses as part of continuing initiatives to amend the Clean Air Act. The task group will prepare testimony and provide technical support materials.

Regulatory

- o VOC Emission Regulations and Guidelines - The Process Emission Regulations Task Group will advocate to EPA the acceptance of flares as an acceptable air pollution control device for newly developing VOC emission regulations and guidelines.
- o Health Effects, Vegetation Effects, and Air Quality Characteristics - The Air Pollutant Effects (APE) Task Group will monitor technical/scientific studies and will submit comments to the EPA on a case-by-case basis.
- o Revised Ozone Standard - The APE Task Group will monitor and appropriately respond as part of EPA's regulatory development process in revising the ozone ambient air quality standard.
- o Secondary Standards - The Air Pollutant Effects Task Group will monitor the National Crop Loss Assessment Network research on vegetation effects, which has the potential to affect the development and/or revision of secondary ambient air quality standards.
- o SO₂ Standard - The APE Task Group, in conjunction with the Air Dispersion Modeling Task Group, will develop an advocacy program to impact on EPA decisions on the SO₂ ambient air quality standard.
- o New Source Performance Standard (NSPS) for Fugitive Emissions - The Process Emission Regulations (PER) Task Group, upon promulgation of a final standard, will evaluate the standard and initiate appropriate additional activities.
- o NSPS For Air Oxidation - The PER Task Group will testify at public hearings and submit written comments in response to a proposed NSPS for air oxidation processes.
- o NSPS for Distillation, NSPS for Industrial Boilers, and NSPS for Polymers/Resins - CMA will testify at the National Air Pollution Control Techniques Advisory Committee (NAPCTAC) hearings, and, subsequent to proposal, will testify at public hearings and will submit written comments to the Agency in response to the three proposed standards.
- o NSPS for Storage Tanks - The PER Task Group will work with EPA to affect the ultimate standard and will submit comments and testify at public hearings.

- o NSPS for Secondary Emissions - The PER Task Group will monitor and comment on EPA R&D projects that could affect the standard that is developed.
- o NSPS for Liquid/Liquid Extraction - The PER Task Group will provide preliminary technical input to EPA in order to favorably direct EPA's standard development process.
- o National Emission Standard for Hazardous Air Pollutants (NESHAP) for Benzene - Maleic Anhydride Plants - The PER Task Group will evaluate the final standard and will assist in anticipated litigation challenging the regulations.
- o NESHAP for Benzene - Storage Tanks, NESHAP for Benzene - Fugitive Emissions, and NESHAP for Benzene - Ethylbenzene/Styrene Plants - The PER Task Group will evaluate any final standards and assist as appropriate in possible litigation challenging any or all of the NESHAP regulations.
- o NSPS for Fired Heaters - The PER Task group will participate in the standard development process.
- o NESHAP for Vinyl Chloride - The PER Task Group will maintain a liaison with and provide assistance to SPI in order to monitor and favorably influence the standard development process.
- o NESHAP for Radionuclides - The PER Task Group will monitor EPA's regulatory development process.
- o Control Device Evaluation (CDE) for Carbon Adsorption - The PER Task Group will provide technical input and evaluate EPA R&D projects on the CDE.
- o Control Technique Guidelines (CTG) for Air Oxidation - The PER Task Group will monitor EPA action regarding the CTG.
- o CTG for Polymers/Resins, and CTG for Storage Tanks - The PER Task Group will submit comments on both draft CTGs and respond to additional information requests.
- o CTG for Fugitive Emissions - Upon promulgation, the PER Task Group will evaluate the final document and initiate appropriate additional activities.
- o Primary Health Effects Based Standards - The APE Task Group will work with EPA and API in refocusing standards setting activities to relate more directly to dose exposure. The goal is to further refine the definition of "significant adverse effects" as the basis for setting primary ambient air quality standards.

Community/Public Relations

- o Clean Air Act Amendments - Task Group members and CMA staff will conduct media tours to inform the public of CMA's positions. Additional public relations materials will be prepared and distributed as necessary.

Education

- o New Issues - Air program activities will be thoroughly reviewed at the semiannual Environmental Updates for the benefit of member company personnel.
- o Clean Air Act Amendments and Other CMA Positions - Task group members and CMA staff will maintain liaison with primary trade associations and business groups in order to build support for CMA's position regarding Clean Air Act amendments and other issues of importance to the chemical industry.

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WATER PROGRAMS

Legislative

- o Clean Water Act (CWA) Amendments - The Water Policy Task Group will support the Government Relations Committee by providing analyses as Clean Water Act Amendment initiatives gain prominence in congressional discussions. The task group will prepare testimony for CWA hearings and provide support materials.

Regulatory

- o Revised EPA Water Quality Criteria - The Water Quality Criteria and Research (WQC&R) Task Group will work closely with EPA as part of an advocacy plan stressing a need for EPA to revise the water quality criteria. The task group will evaluate and submit comments when EPA publishes revised criteria.
- o National Pollutant Discharge Elimination System (NPDES) - The Water Permits Task Group will work in conjunction with the State Affairs Special Committee in order to positively impact on state development of revised NPDES implementing regulations, and to achieve regulatory improvements in states' permitting programs.
- o Clean Water Act Regulations - CMA water program task groups will monitor EPA development of necessary regulations to implement any legislative changes to the Clean Water Act. The relevant task group will advocate that the regulations ultimately issued are technically sound and cost-effective.
- o Aquatic Fate and Toxicology - The Water Quality Criteria and Research Task Group will initiate a cooperative program with EPA concerning research on aquatic fate and toxicology.
- o Best Conventional Technology (BCT) Methodology - The Effluent Guidelines Task Group will work with EPA to assure that the Agency revises its BCT methodology in compliance with the Clean Water Act and a favorable court decision.
- o Best Practicable Technology (BPT) and Best Available Technology (BAT) Effluent Limitations Guidelines - The Effluent Guidelines Task Group will work closely with EPA and submit appropriate comments and support materials to them in order to assure that the effluent guidelines ultimately issued for the chemical industry are technically sound and cost-effective.
- o Pretreatment - The Effluent Guidelines Task Group will monitor the progress of EPA in developing categorical pretreatment standards and will submit comments to the Agency as appropriate.

- o Groundwater/Leachate Treatment - The Effluent Treatment and Control Technology Task Group will provide technology assistance to the RCRA Regulations and Groundwater Management Task Groups on groundwater/leachate treatment issues.
- o New Technologies - The Effluent Treatment and Control Technology Task Group will monitor EPA programs, evaluate proposed technologies, and pursue acceptance of practicable and cost-effective new and promising technologies by the Agency.
- o CMA/EPA Five-Plant Study - The Effluent Treatment and Control Technology Task Group plans a followup study to complement and enhance the findings of the joint CMA/EPA Five-Plant priority pollutant project.

Community/Public Relations

- o Clean Water Act Amendments - Task group members and CMA staff will assist with development of public relations materials and will conduct media tours where appropriate to inform the public of CMA's positions.

Education

- o National Pollutant Discharge Elimination System (NPDES) Permits - CMA will educate member companies as to substantive implications of the NPDES settlement agreement so that individual member companies can effectively take advantage of the changes in permit application procedures.
- o New Technologies - The Effluent Treatment and Control Technology Task Group will develop a workshop to discuss water pollution control technological developments, to be conducted when appropriate member company interest is established.
- o Biological Treatment - CMA will sponsor a seminar for member companies on biological treatment.
- o State Water Quality Standards - The Water Quality Standards Task Group will assist in advising member companies how to respond to state water quality standard revisions.

NEW ISSUES 1982-83

SOLID WASTE REGULATORY PROGRAMS

Legislative

- o RCRA Amendments - The RCRA Regulations Task Group will support the Government Relations Committee by providing policy analyses as part of continuing initiatives to amend the Resource Conservation and Recovery Act. The task group will prepare testimony for hearings and provide technical support materials.

Regulatory

- o Land Disposal Regulations - The RCRA Regulations Task Group will review and comment on EPA's land disposal interim final standards.
- o RCRA Revised Regulations - As EPA issues proposed revisions to its implementing regulations in accordance with settlement of various issues in Shell v. EPA, the RCRA Regulations Task Group will review and prepare supporting comments.
- o New RCRA Regulations - Should RCRA be amended, the RCRA Regulations Task Group will work with EPA in development of new or revised implementing regulations. Areas of anticipated activity concentrate on burning in boilers and liquids in landfills. In addition, EPA probably will propose new regulations that expand waste listings and classifications. The task group will open new lines of communication with EPA in order to assure that these regulations are technically sound and cost-effective.
- o Hazardous Waste Treatment - Over the next few years we anticipate growing pressures for industry to treat or destroy wastes rather than landfill them. The RCRA Regulations Task Group, in conjunction with the other hazardous waste management task groups, will evaluate current practices and the options industry has available to further treat/destroy wastes.
- o Tort Law Study - The Superfund Task Group will analyze and respond to the tort law study required by CERCLA (Superfund).
- o Waste End Study - The Superfund Task Group will analyze and address the issues arising from the waste end study that is to be completed within the next four years.
- o Site Activities - The Superfund Task Group will track EPA's activities on site cleanup; remedial action; removal action and proposals on cleanup; monies allocated and spent; and litigation and settlement agreements at the state, local and private levels.
- o Superfund Costs - CMA will review EPA's methodology and calculations for determining the cost of cleanup for those sites identified as posing a significant problem and requiring cleanup.

- o State Pre-emption Litigation - The Superfund Task Group will attempt to resolve part of this issue administratively with EPA. The task group will follow activity in this area on the state level and recommend intervention in judicial actions where appropriate.

Community/Public Relations

- o Superfund - CMA will sponsor media tours and other public relations programs to inform the public of industry's activities. The task group will develop pro-active programs to help EPA carry out its objectives under Superfund (e.g., help assure cost-effectiveness of cleanup activities).

Education

- o Superfund - CMA member company personnel will be educated to new and emerging Superfund issues at two Environmental Updates during the year. A separate seminar will be held if judged appropriate.

NEW ISSUES 1982-83

HAZARDOUS WASTE MANAGEMENT PROGRAMS

Legislative

- o Groundwater Management - CMA will monitor and respond to any federal legislative developments and will monitor state legislative developments in conjunction with the State Affairs group. CMA will testify on legislative proposals where appropriate.

Regulatory

- o Groundwater Management - The Groundwater Management Task Group will follow activities of the U.S. Geological Survey and EPA, and will work closely with these agencies in the development of a federal groundwater policy to assure that it is technically sound and cost-effective. The task group will work with the CMA State Affairs group to more effectively impact on state regulatory groundwater matters. CMA will publish a revised CMA groundwater policy that takes into consideration several emerging issues.
- o Hazardous Waste Siting - The Siting and Permitting Task Group will prepare a CMA position paper on state hazardous waste facility siting and permitting.

Community/Public Relations

- o Hazardous Waste Siting - Following publication of a CMA position paper on state hazardous waste facility siting, the policy will be widely distributed and an appropriate public relations program developed.
- o Groundwater Management - CMA will publish an introductory groundwater booklet as a public relations project.

Education

- o Solid Waste Technology - CMA will establish an information exchange with EPA, and will consider establishing a member company information exchange to assist companies in developing a reliable design for a hazardous waste facility.
- o Hazardous Waste Siting - Appropriate educational programs and seminars will be sponsored subsequent to the development of a CMA position on state hazardous waste facility siting.
- o Groundwater Management - Emerging issues of concern will be explored with the National Governor's Association, National Conference of State Legislatures, National Association of Manufacturers, Business Roundtable, Association of State and Interstate Water Pollution Control Administrators, Western Regional Council, and the Water Resources Council, in an effort to publicize and strengthen CMA's position.

- o New Groundwater Documents - CMA will publish a short technical manual and a groundwater classification scheme to be used as educational/advocacy tools.
- o Environmental Update - New and emerging issues will be explored for the benefit of member companies at the semiannual Environmental Updates. The Groundwater Management Task Group will identify any issues that should be treated as a separate seminar and make appropriate plans.

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GENERAL PROGRAMS

Regulatory

- o Groundwater Sampling - The Environmental Monitoring Task Group (EMTG) will determine the feasibility of preparing a groundwater sampling and analysis manual, and will prepare and issue one if so indicated.
- o BAT Organic Chemicals Guidelines - The EMTG will review the analytical/monitoring aspects of EPA's organic chemical effluent guidelines development document.
- o Solid Waste/Sludge Sampling - The EMTG will evaluate the feasibility of a solid waste/sludge sampling and analysis manual, and will prepare and issue one if advisable.
- o Owner's Manual - The EMTG and Effluent Guidelines Task Group will prepare and issue an "Owner's Manual" for the CMA/EPA Five-Plant Study Report that would provide case histories of effective use of the report in NPDES permit negotiations.

Education

- o State/Regional Seminars - The EMTG will participate in state or regional seminars on the CMA/EPA Five-Plant Study, if they are held, in order to increase the utility of the report for member companies. The task group would concentrate on the analytical and monitoring aspects of the report.
- o Environmental Update - All active general environmental programs will report to member companies at the semiannual Environmental Updates.