

CHEMICAL MANUFACTURERS ASSOCIATION
ENVIRONMENTAL MANAGEMENT COMMITTEE
AND THE
HEALTH AND SAFETY COMMITTEE
MINUTES OF JOINT MEETING

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FOR DISTRIBUTION BY CMA
ENVIRONMENTAL DIVISION
FROM DAVID CARROLL
DATE 10/23/89

October 11, 1989

Stouffer's Crystal City Hotel
Dewey Room

Arlington, VA

P. M. King, EMC Chairman, called the joint meeting to order at 3:00 p.m. The following individuals were present:

EMC MEMBERS PRESENT

P.M. King, Chairman
R.D. Bradford, Jr.
H. Campbell
T.S. Casey
R.A. Dennis
L.P. Hughes
T.L. Jennings, Vice Chairman
L.D. Johnson
C. Malloch
M. Marshall
C. Mattia
J. M. Salmela
R. Vaseleski
D.W. Carroll, Staff Executive

AFFILIATION

PPG Industries, Inc.
Olin Corporation
E.I. du Pont de Nemours & Co.
Hoechst Celanese Corporation
American Cyanamid Company
Mobay Corporation
Occidental Chemical Corporation
Rohm and Haas Company
Monsanto Company
Lonza, Inc.
NL Chemicals, Inc.
Chevron Chemical Company
Amoco Chemical Company
CMA

EMC MEMBERS ABSENT

J.B. Martin
R. Monty

The Dow Chemical Company
GE Plastics

HSC MEMBERS PRESENT

R. Van Mynen, Chairman
C. Capaldi
F. Dyste
M. Fink
A. Friedman
E. LeBeau
B. Lockhart
H. Price
I. Rosenthal
C. Schaller
D. Sigman
C. Willett, Vice Chairman
G.D. Strickland, Staff Executive

Union Carbide Corporation
ARCO Chemical Company
Dow Corning Corporation
Amoco Corporation
American Cyanamid Company
The Dow Chemical Company
Eastman Kodak Company
Quantum Chemical Corporation
Rohm & Haas Company
E.I. du Pont de Nemours & Co.
Exxon Chemical Company
Shell Oil Company
CMA

CMA 060963

HSC MEMBERS ABSENT

S.P. Engelman
H.A. Eschenbach
J.H. Senger

Hoechst Celanese Corporation
W.R. Grace & Co.
Monsanto Company

PRESENT BY INVITATION

B.A. Barrosse
J.R. Condray
S. Conti
G.V. Cox
B. Cuccherini
E.M. Currie
B. Hindin
L.J. King
D.S. Layne
A.M. Mason
T.F. O'Leary
R.D. Ondocsin

E.I. du Pont de Nemours & Co.
Monsanto Company
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- 1.0 All attendees introduced themselves including their company affiliation.
- 2.0 Community Exposure Value Pilot Project - J. Price
 - 2.1 J. Price provided the attendees with an overview of the CEV pilot project (see attached handout), including:
 - o the use of the CEV system to date;
 - o result of a July survey on the CEV pilot project; and
 - o findings on the pilot project.
 - 2.2 The key findings concerning the CEV pilot project were:
 - o a wide variation exists between companies on CEV's for a variety of reasons;
 - o significant legal and public communication concerns exist;
 - o a clear need for a consensus building effort on methodologies exists; and
 - o there is a question on the utility of continuing the project based on the level of participation.
 - 2.3 J. Price indicated that the pilot project did achieve its two objectives of sharing information, and confirming the need for future consensus building on methodologies.
 - 2.4 J. Price advised that the HSC has recommended that the CEV pilot project be sunset. P. M. King indicated that the EMC will take up the HSC recommendation as soon as possible.

3.0 RFP/Community Health Effects Project -- J. LeBeau

- 3.1 J. LeBeau provide the attendees with a report on the responses received to the RFP on the Community Health Effects Project. The task group that reviewed the three responses received indicated that all bids were unacceptable. The Task Group will survey the non-bidders to see why they did not respond.
- 3.2 J. LeBeau discussed with the attendees an alternative proactive approach of making "imposed risk" a new focus area for CMA. The sub categories of imposed risk to be included are: assessment, management, exposure, and communications.
- 3.3 J. LeBeau indicated that one of the goals of this initiative is to factor social and economic aspects into the existing scientific and technical elements of risk that will evolve new approaches to addressing imposed risk. Another objective is build a consensus approach on imposed risk involving industry, academics, regulators, and others. The ultimate objective is to build flexibility into quantitative risk assessment conducted by EPA.
- 3.4 An ad hoc study group on imposed risk will be set up to help define the goals and objectives of this initiative, define internal and external resource needs, and develop a work plan. J. LeBeau indicated that help from communications and human relations experts within CMA is needed.
- 3.5 J. LeBeau indicated that he hoped to be prepared to make a January, 1990, presentation to the Board of Directors on risk, and discuss a strategy and work plan for consensus development on the imposed risk initiative.
- 3.6 In discussing organizational factors, the possibility of ultimately using a CEO to chair the group was raised. In addition, a sensitivity of coordination with other key industry groups, i.e., AIHC, CIIT, on exposure and communications was raised. Another sensitivity was to be extremely careful in how to bring people together so that we do not "poison" the effort before it starts.

4.0 Regulatory Advocacy - T. Jennings

- 4.1 T. Jennings reviewed with the attendees the EMC's preparatory activities for the Board of Director's review of CMA regulatory advocacy, including:
 - o the use of case studies;
 - o evaluation of EMC activities against a ten step regulatory advocacy process;

- o identification of potential study areas; and
- o identification of objectives.

(A copy of the EMC's ad hoc regulatory advocacy group most recent minutes is attached).

5.0 Smaller Company Assistance and Recruitment - T. Casey

5.1 T. Casey discussed with the attendees the EMC's setting up a work group to address smaller company/facilities assistance (including suppliers and customers). He solicited HSC member company participation on this work group (mission statement and company participation list attached).

5.2 The attendees identified the following needs, ideas, approaches for assisting smaller companies/facilities, as follows:

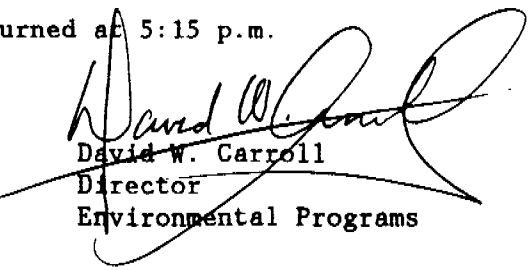
- o need to identify smaller company/facility needs;
- o need to have a feedback loop established;
- o need to look at all options;
- o may have to go directly to the facilities to provide assistance;
- o streamline manuals for broader distribution aimed at non-experts at facilities;
- o computer enhancements - electronic bulletin boards, data collection/analysis, education programs;
- o PC expert systems (for narrow key issues need certain logic loops) -- methodology oriented rather than for compliance;
- o need to assure facilities get assistance when they need it (will go elsewhere if they do not get timely help.);
- o establish SWAT teams of volunteers to assist smaller companies/facilities on site; and
- o develop more "how to" materials and/or regional seminars.

6.0 Next EMC/HSC Joint Meeting

The next joint meeting of EMC/HSC is scheduled for the afternoon of February 20, 1989.

7.0 Adjournment

The joint EMC/HSC meeting adjourned at 5:15 p.m.


David W. Carroll
Director
Environmental Programs

October 20, 1989
Minutes Subject to Approval

Attachments

Distribution: Environmental Management Committee
Health and Safety Committee
CMA Staff matrix Team

CMA 060966

Pilot Information Exchange
of
Community Exposure Values
(PIECEV)

February, 1988, Joint HSC/EMC session. The committees suggested that CMA set up the PIECEV program.

July, 1988, Health and Safety (HSC) and Environmental Management Committees (EMC) approved the project.

September, 1988, CMA Board of Directors briefed on joint HSC/EMC project.

October, 1988, Letters sent to immediate past and current member companies represented on CMA's HSC/EMC and Board of Directors regarding participation in the PIECEV program.

January, 1989, Health and Safety Committee approved criteria for the evaluation of PIECEV.

April, 1989, CMA Board of Directors briefed on six-month extension of project.

July, 1989, Letters requesting feedback and response forms sent to participating and non-participating companies.

October, 1989, Joint EMC/HSC meeting to discuss future of project.

PIECEV Requests

Number of requests filled

March	6
April	3
May	0
June	2
July	1
August	0
September	0

Total number of requests = 12

First request filled - March 8, 1989

Last request filled - July 10, 1989

*Estimated number of calls to the system -- 20-25.

CMA 060967

HEALTH AND SAFETY COMMITTEE
ENVIRONMENTAL MANAGEMENT COMMITTEE

Joint Discussion

Issue: Pilot Information Exchange of Community Exposure Values
(PIECEV)

Background: The Health and Safety Committee (HSC) and Environmental Management Committee (EMC) conducted a pilot program to facilitate and encourage the sharing of community exposure values (CEVs) among CMA member companies. It was hoped that participating companies would learn what CEVs were being selected by other companies and on what basis these decisions were being made. Such information was expected to be helpful to companies during their community awareness program.

The one-year phase of the pilot is complete. We evaluated the pilot program which included both written and oral comments from participating and non-participating companies. It should be noted that the use of the program has been extremely limited with a steady downward trend of participation.

After examining information submitted into the system and talking with several companies, the following facts were noted:

- o Because of the limited submissions and the applications of different safety factors, no conclusions can be reached regarding the wide range in CEV numbers for particular chemicals;
- o To set CEVs, most submitters used TLVs and NOEL/LOELs divided by a safety factor. Risk assessment (LMS, 95% upper confidence limit) was used in only a few submissions.
- o The choice of safety factors varied widely between companies based on scientific judgments.
- o The few CEVs set by risk assessment were for common high volume chemicals where a large amount of toxicological data exists.

Action Requested: Discuss and determine future of the Pilot Information Exchange of Community Exposure Values.

CMA 060968

October 5, 1989

CMA PILOT INFORMATION EXCHANGE OF COMMUNITY EXPOSURE VALUES

CEV Information Submitted

*Air Products

Allied-Signal

American Cyanamid

BP Chemicals America

Chevron Chemical Company

Dow Chemical Company

Dupont

Eastman Kodak Company

Ethyl Corporation**

Exxon Chemical Americas

Fina Oil and Company

*FMC

General Electric (Plastics)**

Hoechst Celanese

ICI Americas

Mobay Corporation

Olin Chemicals

Rohm and Haas

Shell Oil Company

Texaco Chemical

Union Carbide

* Chemical-specific CEV information not provided. Clarifying information required.

** CEV's submitted but not in proper format for participation.

CMA 060969

PILOT INFORMATION EXCHANGE OF COMMUNITY EXPOSURE VALUES (PIECEV)

SUMMARY OF COMMENTS

On July 18, 1989, CMA sent a letter to all companies participating and companies that chose not to participate in the Pilot Information Exchange of Community Exposure Values (PIECEV). We asked for feedback on the project to help evaluate it and form a recommendation for the Board of Directors. We received a total of 19 written responses; 10 from participating companies and 9 from non-participating companies. The following is a summary of responses:

Participants

1. Does sharing of CEV information lead to re-examination of company CEVs or methodologies used to determine CEVs?

Although no company actually changed a CEV, several participants responded yes to this question. The sharing of information allowed companies to gain perspective for their evaluations.

2. What are the benefits of participation to your company?

By participating in the pilot program, companies shared knowledge of what others were doing and had an opportunity to compare CEVs. The pilot provided the feedback necessary to make a company take a second look at its own numbers.

3. How could the program be improved?

Making available a summary of values on screen with the capability to request documentation for individual values and increasing the response speed of the computer would help to improve the program. Also, providing guidelines on CEV development would help to make CEVs more consistent.

4. Should the program be continued?

Although use is extremely limited, companies felt the program should be continued, but with a broader perspective. It was also noted, that if the future Clean Air Act provides federal guidance on computing CEVs, the program would not be useful.

Non-participants

1. Why did your company choose not to participate?

Non-participating companies listed a number of reasons for not joining the pilot including: they have not developed CEVs; they have not had enough time to participate; and they have no data or other bases to establish these values.

2. How could the program be changed to encourage your participation?

The benefits of the program would have to be more obvious and more applicable to individual situations. Also, some general guidelines for relating CEVs to OSHA or ACGIH PELs would need to be developed.