

Chemical Manufacturers Association
Record of Meeting
Special Projects Advisory Group

CMA Conference Room 404
July 9, 1980

Attendance

Members Present

Thomas J. Mooney, Chairman
Frank A. Bower

Edward W. Callahan
Fred C. Dehn
Richard J. Kociba
Curtis W. Smith

Company

The Procter & Gamble Company
E. I. du Pont de Nemours
& Company
Allied Chemical Corporation
PPG Industries, Inc.
Dow Chemical U.S.A.
Shell Chemical Company

Ex-Officio Members Present

Donald A. Hart, for
Leon Golberg
Hasmukh C. Shah

CIIT
CMA

Present By Invitation

Debra J. Boltas
Anthony B. DeAngelo
Patrick Joyce
Joseph T. Seawell
Carol R. Stack
David F. Zoll
John C. Van Horn

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1.0 The minutes of the June 17, 1980, meeting were APPROVED.

2.0 Special Programs Guidelines

Revision of the draft Special Programs Guidelines was completed. Dr. Shah will review remaining questions with the CMA legal department. The Guidelines will then be sent to SPAG members for final review. Any comments from SPAG members must be made to Dr. Shah within 15 days of receipt. SPAG comments will then be incorporated into the Guidelines which will be distributed to all members of Special Program Panels for review and comment. The Guidelines will then be submitted to the CMA Executive Committee for approval.

3.0 Chlorobenzenes

EPA issued a TSCA Section 4(a) Draft Test Rules Package on Chlorobenzenes early this year. In order to formulate a timely response to EPA, several groups representing chlorobenzenes producers and processors assumed the responsibility of addressing issues raised in the Package. CMA's Chemical Regulations Advisory Committee (CRAC) Testing Task Group identified broad policy and legal issues and has spoken with EPA regarding the precedent-setting aspects. The Chlorobenzenes Project Panel, which had been research oriented and specifically devoted to expansion of the toxicology data base on monochlorobenzene, orthodichlorobenzene, and para-dichlorobenzene, established a Toxicology Regulatory Task Group (TRTG) to address specific toxicological issues concerning the six chlorobenzenes recommended for immediate testing by EPA.

Dr. Richard Kociba made a presentation to SPAG on behalf of Patricia Simmons, Chairman of the TRTG, in which he stated the intent of the TRTG to provide technical comments on EPA's proposed testing.

A chlorobenzenes task group (Chlorobenzenes Producers Association) formed within SOCMA has assumed an advocacy role and has done several studies. Various CMA task groups are looking to coordinate their efforts with SOCMA so as to present a unified industry position on the Test Rules Package. Dr. Kociba asked SPAG for guidance on how comments developed by the CMA Chlorobenzenes TRTG should be submitted to EPA. The question as to whether the Chlorobenzenes Project Panel should broaden its charter so as to allow the Panel to assume future advocacy positions was also addressed.

SPAG voted as follows:

SPAG recommends that the work in progress on chlorobenzenes be continued and that a meeting be arranged by CMA with participation by members of the Chlorobenzenes Project Panel, Chlorobenzenes TRTG, CRAC Testing Task Group, SPAG, SOCMA Chlorobenzenes Producers Association, and legal counsels of CMA and SOCMA. SPAG recommends that those members of SPAG with background on the chlorobenzenes issue represent SPAG at this meeting. Those members are: Fred Dehn, Dick Kociba, Curtis Smith and Thomas Mooney.

SPAG also recommends that this meeting cover:

- long-range planning for research and advocacy responsibilities;
- coordination of comment for submission to EPA;
- how to implement and maintain coordination with SOCMA;
- make up of an appropriate CMA Chlorobenzenes Panel which may include present members of the Chlorobenzenes Project Panel and new members with regulatory, business and legal expertise; and,
- consideration of a charter for this Panel.

4.0 The next meeting of SPAG will be August 21, 1980, 9:30 a.m., at Shell Headquarters, Suite 200, 1025 Connecticut Avenue, N.W., Washington, D.C. 20009.

5.0 The meeting was adjourned at 3:00 p.m.

Hasmukh Shah

Hasmukh C. Shah, Ph.D.
Director, Special Projects

Subject to approval.

CMA 121903