

TO: J. D. Burns

~~TCG: JOL~~: ERT: MJH: AJO: RF

XF: None

FROM: T. G. Grumbles  
DATE: February 11, 1991

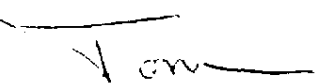
Interoffice  
Communication

SUBJ: EPA'S VOLUNTARY EMISSIONS REDUCTION PLAN

VISTA

In my memo of December 6th to you, I described what we knew about EPA's voluntary emissions reduction plan. At that time, we did not know which companies would be receiving "invitations" from EPA to participate. I recently discovered the attached letter had been received at the LCCP. I am checking to see if we've received letters at other locations. This letter is an indication that we may be targeted for participation in the voluntary program. We believe EPA intends to make public the companies targeted.

In anticipation of this, we are preparing an "if-asked" statement to be used for initial responses. How we respond in the long-term will, of course, need to be decided. The most recent correspondence on this matter from CMA is also attached. Until further details are known on what may be asked of us, I don't believe we can begin the decision process. This is consistent with CMA's advice.

  
T. G. Grumbles

dlj

Attachment

cc: R. D. Gamblin, T. H. Huffman, M. S. Reynolds

VVV 000011803



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JAN 14 1991

OFFICE OF  
THE ADMINISTRATOR

CHIEF EXECUTIVE OFFICER

VISTA CHEMICAL COMPANY  
P O BOX 727  
WESTLAKE, LA 70669

DEAR CHIEF EXECUTIVE OFFICER :

The Environmental Protection Agency is launching a voluntary initiative to reduce toxic chemical emissions that directly affects your company. I'd like to take this opportunity to introduce you to our new effort, and to invite you to consider ways that EPA and industry can work together to make significant progress in reducing toxic pollution.

Specifically, EPA has targeted 17 high priority toxic chemicals for substantial reductions. I have set a nationwide voluntary goal of a one-third reduction in total releases or off-site transfers of these chemicals by 1992, and a 50% reduction by 1995, with 1988 as a baseline year. I want to emphasize that these are *aggregate* national goals, which may not be achievable or appropriate for every company or every plant. I am convinced, however, that by working together in a cooperative manner, we can meet or exceed our objective of reducing total, nationwide releases or transfers of these chemicals. You are in the best position to identify opportunities for reducing toxics. Based on empirical evidence to date, EPA anticipates that these reductions can be accomplished through pollution prevention practices which eliminate waste at the source, rather than relying on treatment after wastes have been generated.

I have attached a list of the 17 target chemicals. In addition, we will be focusing a great deal of effort on minimizing, and where possible, eliminating, all environmental releases of dioxin. These chemicals were selected based on a combination of criteria: health and environmental effects, production volumes, and abundant opportunity for achieving reductions through pollution prevention. We will be focusing on industrial releases of these chemicals, and will use data in the Toxics Release Inventory (Section 313 of the Emergency Planning and Community Right-to-Know Act) as our yardstick of progress.

The American public has made clear that they expect nothing less than dramatic reductions in toxic chemical releases. The challenge before EPA and industrial leaders is this: how do we bring such reductions about? One way is by the conventional command-and-control option which has been the Agency's

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mainstay for the past twenty years. But I believe there is another, more fruitful path that we can follow which is faster, and without the detailed direction which is likely to be demanded by the public if voluntary efforts are not fruitful.

In the summer of 1989, I met with leaders of nine companies whose facilities had been identified by EPA staff as representing exceptionally high levels of risk due to air emissions. Through a process of frank discussion and negotiation, we were able to arrive at voluntary agreements with all nine companies to reduce their toxic emissions. These efforts resulted in total commitments from all involved to achieve a collective reduction of 83% by 1993. The agreements are all in place, and the emissions are starting to drop. I remain very encouraged by the success of this effort.

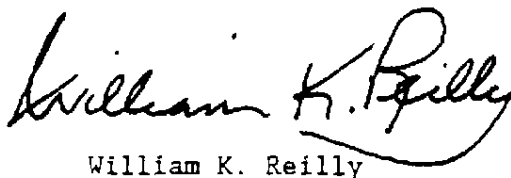
We are extending the same tactic to the hundreds of facilities that release substantial amounts of the 17 priority chemicals. Your own company's facilities are among them. We are now establishing priorities and working out a host of details. We want to learn which elements of environmental programs may inhibit aggressive reduction programs. We will also make every effort to see that reductions achieved under this initiative are given credit, where appropriate, under the new Clean Air Act requirements, and are committed to giving positive public recognition to ambitious efforts by companies such as yours in this area.

It is an important opportunity for both our organizations; therefore, I would encourage you to begin considering your response to this initiative now, as we may be contacting you shortly to arrange a meeting with my top managers to discuss your ideas and appropriate commitments to reduction. I want to emphasize that this is a voluntary program, and that there are no penalties should you decide not to participate.

If this initiative is approached with the same commitment and openness as our earlier air toxics initiative, however, together we can achieve great success and deliver historic and cost effective environmental improvements to the country.

As I travel around the nation, increasingly I am meeting a new generation of corporate leaders who are ready and able to step up to the challenge of preventing pollution before it becomes a problem. I hope we can count on your help. Thank you for giving this matter your full attention.

Sincerely yours,

A handwritten signature in dark ink, reading "William K. Reilly". The signature is fluid and cursive, with the first name "William" and last name "Reilly" clearly legible. The middle initial "K." is smaller and less distinct. The signature is written over the typed name "William K. Reilly".

William K. Reilly

Attachment

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EPA'S INDUSTRIAL TOXICS PROJECT:  
THE SEVENTEEN CHEMICALS TARGETED FOR REDUCTIONS

BENZENE  
CADMIUM AND COMPOUNDS  
CARBON TETRACHLORIDE  
CHLOROFORM  
CHROMIUM AND COMPOUNDS  
CYANIDES  
DICHLOROMETHANE  
LEAD AND COMPOUNDS  
MERCURY AND COMPOUNDS  
METHYL ETHYL KETONE  
METHYL ISOBUTYL KETONE  
NICKEL AND COMPOUNDS  
TETRACHLOROETHYLENE  
TOLUENE  
TRICHLOROETHANE  
TRICHLOROETHYLENE  
XYLENE(S)

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# Executive Alert

January 28, 1991

TO EXECUTIVE CONTACTS OF CMA MEMBER COMPANIES

Subject: ALERT--Meeting with EPA on its Industrial Toxics Project

Dear Executive Contact:

On January 10, I wrote you about the Industrial Toxics Project and a CMA meeting with William Reilly, Administrator of the Environmental Protection Agency (EPA). Our meeting with Mr. Reilly and his staff on implementation of the so-called "33/50" voluntary reduction program occurred on January 22nd. The meeting gave us a better understanding of the Agency's goals as well as an opportunity to express our concerns with certain aspects of the project.

The CMA contingent, led by Frank Popoff of Dow, endorsed the general concept of voluntary reductions and noted the commitments CMA members have made to voluntary reductions under our Responsible Care program.

Mr. Reilly confirmed several key points about this project. They include:

- EPA will recognize all practices within the pollution prevention hierarchy. Thus, recycling and treatment will be recognized as contributions to the voluntary reductions, although source reduction is preferred.
- All voluntary reductions made as part of the Clean Air Act's Credit for Early Reductions are also counted as part of the efforts under the voluntary project.
- EPA affirmed that it will use the Toxic Release Inventory as the measure of achieving the national goal.
- The "33/50" goals are aggregate national goals measuring the reduction in total TRI reported releases of all 17 targeted chemicals across all industries.
- Your involvement in the Industrial Toxics Project is truly voluntary.



CHEMICAL  
MANUFACTURERS  
ASSOCIATION

2501 M Street, NW  
Washington, DC 20037

202-887-1100  
Telex 89617 (CMA WSH)

VVV 000011807

COPY

TO: John Burns

FROM: T. G. Grumbles  
DATE: December 6, 1990

Interoffice  
Communication

SUBJ: EPA'S VOLUNTARY EMISSIONS REDUCTION PROGRAM: THE 30/50  
PLAN

VISTA

This memo is to alert you of the possibility of receiving a letter from EPA Administrator William Reilly regarding Vista's participation in the subject program. Full details of the program and what might be asked by the Agency are not known at this time, but what we do know is summarized below.

EPA will be implementing an Industrial Toxics Reduction Project to gain commitments for voluntary reductions of specific chemicals. The name of the reduction plan, 30/50, derives its name from EPA's national aggregated reduction goal for 18 SARA 313 chemicals. The national goal is 30% by the end of 1992 and 50% by the end of 1995.

The following chemicals, pertinent to Vista, are on the list: benzene, cadmium and compounds, carbon tetrachloride, lead and lead compounds, and xylenes. Chemicals were placed on the list based on potency, prevalence in the environment, extent of human exposure and reduction opportunities.

EPA has not released the names of the companies chosen to get letters, but over 600 companies, 20% of them chemical companies, are on the list.

In summary, EPA will "influence" the setting of corporate reduction goals and each facility will implement a reduction plan to achieve the corporate goal.

I'll keep you advised when we know more. Please let me know if you receive a letter from Reilly.

T. G. Grumbles

dlj

cc: R. D. Gamblin

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