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SARA TITLE III

Section 313 - Communications Meeting

March 24, 1988

Place: Houston, Hyatt Regency
Time: 3:30 a.m. - 12:30 p.m.

Agenda

7:30 - 8:30	Continental Breakfast	
8:30 - 8:45	Introduction	TGG
8:45 - 9:15	Public Outrage and What They Want to Know	MSR
9:15 - 9:45	Needs Assessment - What do we tell? - How do we tell? - Who tells? (Training Needs)	TGG/MSR
~~9:45 - 10:00~~	~~Break~~	
10:00 - 10:30	Possible Elements of a Program	TGG
10:30 - 11:00	LCCC Activities	MGH/ERT
11:00 - 11:15	Other Plant Activities	
11:15 - 11:30	Plan Executive Management Presentation	TGG/All
11:30 - 11:45	Review Action Items	All

Objective: 1) To determine how to address our needs for addressing the impact of SARA 313 emissions reports.

2) Discuss possible elements of a program and current company activities.

POSSIBLE FUGITIVE EMISSIONS CONTRACTORS

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Darbonne Services
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318/855-4869

Team, Inc.
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Beaumont, TX 77706
409/832-7220

ERT
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Versar, Inc.
Dr. Thomas Drygus
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Enviro-Plan
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Radian Corporation
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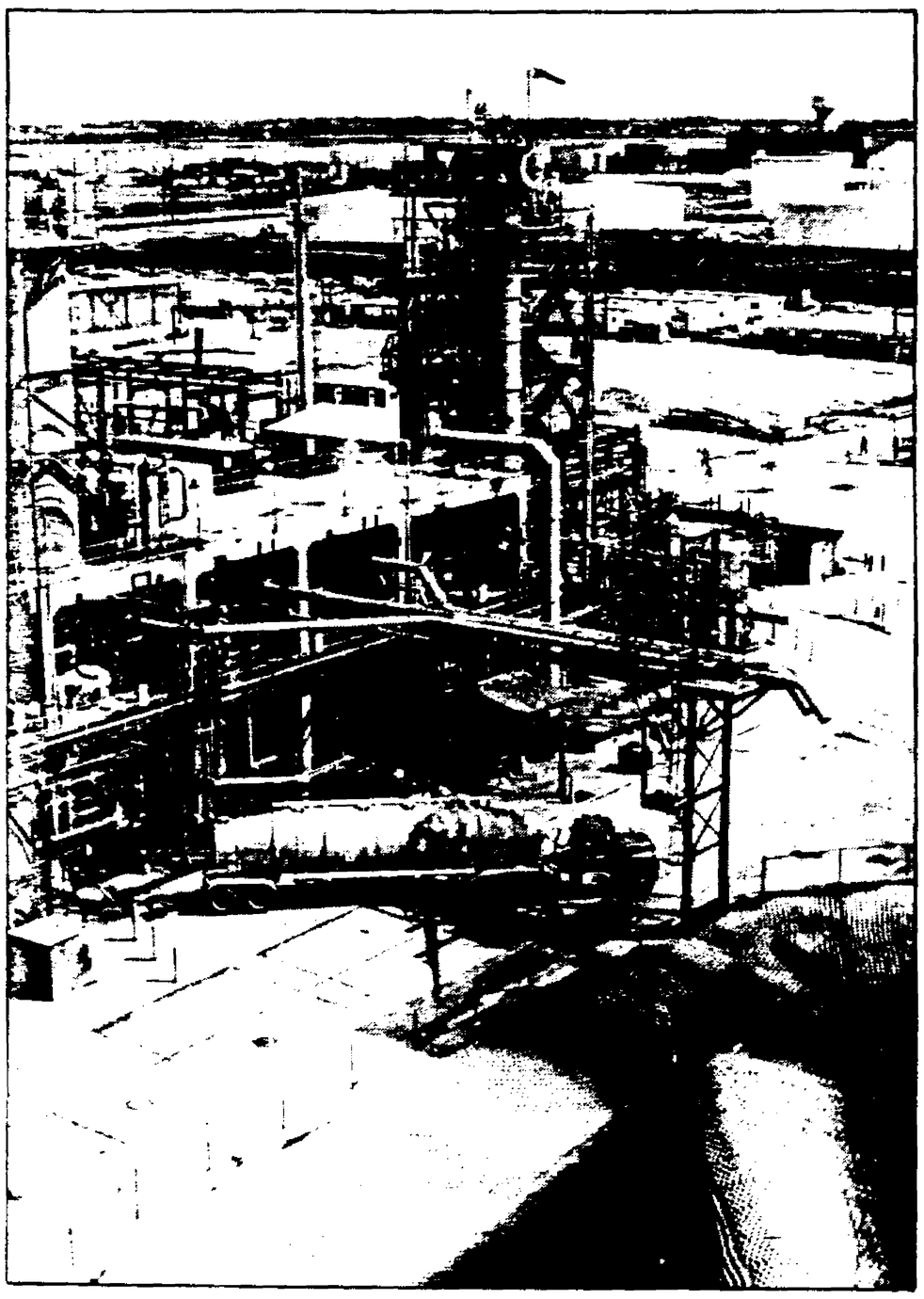
ASSESSING AMBIENT AIR TOXICS



Air quality related issues have taken on new dimensions because of an increased public awareness of toxic air pollutants. In response to this concern, state and federal agencies have been introducing legislation which will restrict public exposure to toxic air pollutants. The states have taken the initiative in developing air toxics regulations which identify specific allowable ambient limits (AALs) for a wide range of potentially toxic compounds.

It is becoming increasingly important for industrial facilities to implement programs that will demonstrate compliance with these stringent air toxics regulations. Data regarding ambient compound concentrations are not only desirable for regulatory purposes, but can be of vital importance when dealing with issues involving environmental liability.

Scott Environmental Technology, Inc., a leading air pollution consulting firm for over 25 years, has the knowledge and expertise to assess emissions from a facility and define the precise impact to local air resources. To determine compliance with air toxics regulations, Scott has the ability to determine property-line concentrations through actual on-site monitoring or by applying dispersion modeling techniques to known emission sources. In addition, Scott's regulatory specialists can provide valuable assistance to expedite the often complex permitting process.

We would welcome the opportunity to discuss how our Ambient Toxics Assessment Program (ATAP) could benefit your organization. For further information, contact R. P. Newman, Scott Environmental Services.

Scott Environmental Technology Inc.

PLUMSTEADVILLE, PA 18949 PHONE: (215) 766-8861 TWX: 510-665-9344

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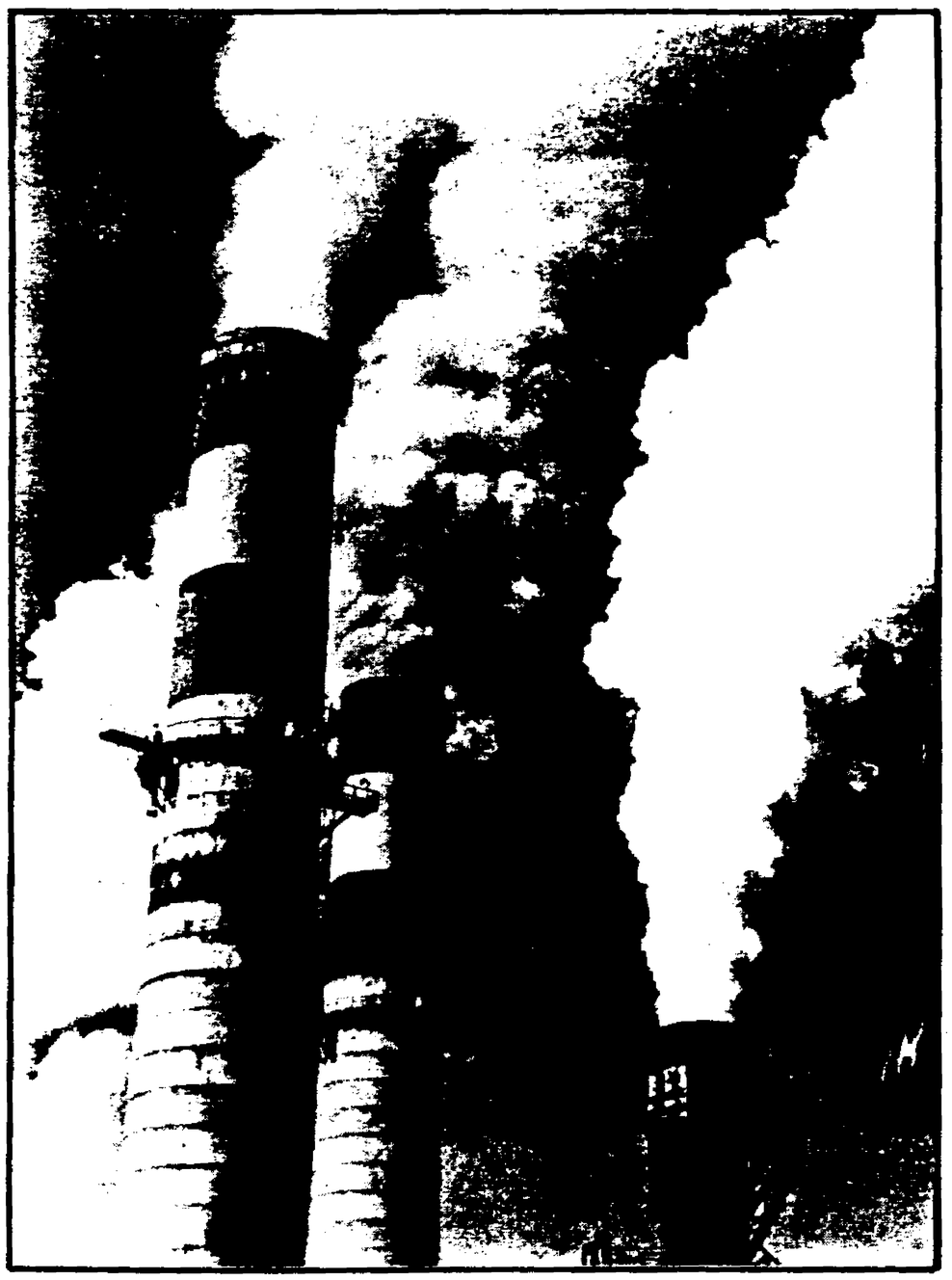
AIR QUALITY MODELING SERVICES



The industrial sector is becoming increasingly aware of the need for reliable data for predicting ambient concentrations of atmospheric pollutants produced from facility stacks, vents, and area sources. Scott Environmental Technology, Inc. has been a leader in the field of air pollution consulting since 1959 and offers comprehensive dispersion modeling services. Air quality dispersion modeling programs offered by Scott can assist facility environmental programs in several areas including:

- Obtaining air quality PSD permits for new or modified sources;
- Determining if existing or increased emission levels will prevent the maintenance or attainment of ambient air quality standards;
- To determine the combustion emission impacts of fuel substitution or changes in fuel quality;
- Principle Organic Hazardous Constituent (POHC) dispersion from incinerator combustion processes;
- Evaluation of fugitive emissions from area sources;
- Modeling of emergency releases; and
- As an internal resource for future contingencies such as plant expansion.

Scott has helped hundreds of clients determine atmospheric impacts by the application of state-of-the-art modeling. All computer models utilized by Scott are EPA-approved and include:

PTPLU	- Multi-Source Screening Model
CRSTER	- Multi-Source Averaging Model
MPTER	- Multi-Point Model with Terrain Adjustments
ISCST	- Industrial Source Complex Short-Term Model
ISCLT	- Industrial Source Complex Long-Term Model
VALLEY	- Complex Terrain Stability Class Concentration Model
PUFF	- Short-Term Release Model

For more information on the capabilities of computer dispersion models and how their use can provide your facility with important air quality data, contact: R. P. Newman or E.J. Gedney, Scott Environmental Services.

Scott Environmental Services

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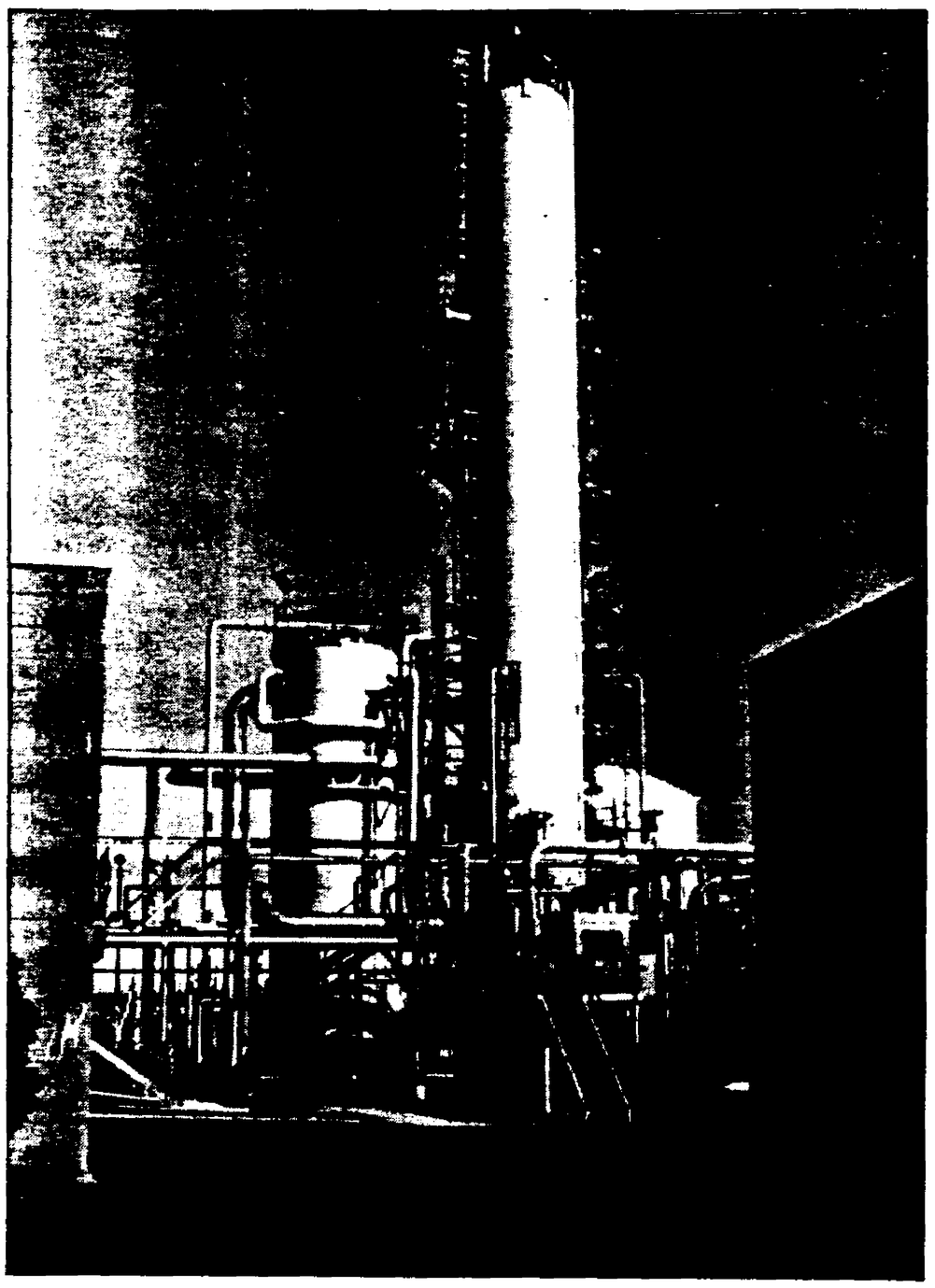
MODELING TOXIC GAS RELEASES



Worldwide events and increasing environmental liability in this country have placed emphasis on understanding the implications of the short term release of toxic gases from industrial facilities. The public is becoming acutely aware of the dangers of short term exposures and is insisting the issue be addressed by companies involved with handling toxic substances. In response to this, regulatory agencies are issuing record fines associated with such releases.

Scott Environmental Technology, Inc., a leader in air pollution evaluation and research for over 25 years, has developed a dynamic program to project the impact of short term toxic gas releases. The program is designed to predict ambient concentrations of toxic gases by utilizing computer dispersion modeling techniques. The program not only identifies situations which could be extremely dangerous, but helps management demonstrate the scientific basis of contingency plans associated with spills, leaks, etc. Basically, if your facility is in an area in which other properties could be impacted by emissions from your plant, a program such as this represents a critical part of an overall environmental/safety plan. Some toxic gas scenarios in which atmospheric releases could effectively be modeled and predicted at varying distances from the plant are summarized as follows:

- A facility stores tanker cars of chlorine gas to be used in production processes. What would be the atmospheric impact if one or more of these cars ruptured?
- A plant had a minor leak of toxic gas and several employees were taken to the hospital. What were the likely concentrations of gas to which the employees were exposed?

We would like to discuss how our program can help your facility determine the implications of a toxic gas release. For further information, please contact R. P. Newman, Scott Environmental Services.

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Basic Program

- **Employee communication**
- **Community communication - nearest neighbors**
- **Local authorities and legislators**
- **Media**

Consider ongoing process - not single events

Possible Activities

- **Employee meetings**
- **Employee newsletters (i.e., plant employee newsletters)**
- **Community presentations (groups, schools, etc.)**
- **Medical community presentations**
- **Speakers list**
- **Local industry group activities**
- **Media days**
- **Visits to local legislators/government authorities**
- **Plant open houses**

Basic Program

- Local authorities and legislators
  - Activities similar to employee or community but "briefer"
  - Avoid "blindsides"
- Media
  - Involve via direct proactive contact
  - Prepare written background materials

Consider ongoing process - not single events

Basic Program

- **Employee communication**
  - **Determine needs or concerns**
  - **In-plant meeting - explain #'s and risk**
  - **Newsletters - consider sending to homes to involve families**
  - **Open house for families**

- **Community communication - nearest neighbors**
  - **Determine needs or concerns**
  - **Communicate with meetings or written form**
  - **Consider open house**
  - **Use LERC if possible**
  - **Know what industry neighbors are saying and doing - "coordinate if possible"**

Consider ongoing process - not single events

Possible Audiences

- **Employees and families**
- **Plant neighbors**
- **Environmentalist**
- **Government authorities/regulators/legislators**
- **Experts - academia, etc.**
- **Media**

"The chemical industry has, largely unrestrained, become the major threat to environmental quality."

Barry Commoner, The New Yorker

How Bad Is It X How Likely = Risk
(as we define it. "Hazard" as the public defines it.)

Hazard + Outrage = Risk as the public defines it

Factors the public uses in determining <u>outrage</u>

- **Voluntary *vs.* Involuntary**
- **Familiar *vs.* Exotic and Unknown**
- **Forgettable *vs.* Memorable**
- **Controlled by individual *vs.* Controlled by system**
- **Fair *vs.* Unfair**
- **Trustworthy *vs* . Untrustworthy**

Conclusions

- People respond more to outrage than hazard.
- People don't listen to risk data when experiencing high outrage.
- Assuming hazards are low, outrage must be lowered, too.
- SARA Title 3 is an opportunity, not a burden.

What Do People Want to Know?

- How safe is it?
- How do you know?
- What are you doing about it?
- What can't you do?
- What can the public do?
- What is this stuff anyway?
- Why didn't you tell us sooner?
- How can we trust you?
- Don't you care?

How easy you make it to get to the data will directly affect how serious the public will believe the problem is.

Don't compare risk to cigarette smoking

You tolerate X,

X is worse than what our company does to you, therefore you have to tolerate what we are doing to you.

FALSE!

What works

- Comparisons of same risk at two different times.
- Comparison with a standard.
- Comparison of estimates.
- Comparison of risk of doing something *vs.* the risk of not doing it and shutting down operations.
- Comparison of alternative solutions.
- Comparison with same risk elsewhere.

Conclusions

- Make all the numbers readily available, but don't emphasize them.
- Find out what people want to know.
- Don't let a preoccupation with numbers keep you from showing that you care about people.
- Use easy-to-understand comparisons to explain the numbers.

Audiences

- Employees, retirees and their families, and other plant-related people
- People near the plants
- Environmental activists
- Health professionals, schools, experts of one sort or another
- Senior citizens, ill people, and other especially vulnerable population groups
- Emergency-response people
- Government officials, politicians, regulators, bureaucrats
- Media

The chemical industry has, largely unrestrained, become the major threat to environmental quality

Barry Commoner, The New Yorker

Unlike the steel, auto and electric-power industries, the petrochemical industry--on its present scale at least, is not essential Nearly all of its products are substitutes for perfectly serviceable preexisting ones; plastics for paper, wood and metals; detergents for soap; nitrogen-fertilizer for soil, organic matter, and nitrogen-fixing crops; pesticides for the insects' natural predators.

Petrochemical products could be replaced by less hazardous ones.

Dr. Peter Sandman, director of the environmental communication research program and professor of journalism at Rutgers University.

How Bad Is It x How Likely = Risk as we define it. Hazard

Hazard + Outrage = Risk as the public defines it.

Factors the public uses in determining outrage

1. Voluntary vs. Involuntary
   Do people have a choice?
   Who gets to decide
2. Familiar vs. Exotic and Unknown
   Oven cleaner, fingernail polish remover vs. tri-methyl meatloaf
3. Forgettable vs. Memorable
   Are the results known--Bhopal
4. Controlled by individual vs. Controlled by system
   Share the knife
5. Fair vs. Unfair
   Where do the poor live. Do they have a choice?

More of a share of risk for neighbors, less a share of the benefit. But becareful with risk-benefit.

During the past forty years, we have experienced a 180-degree change in public attitudes about releases to the

environment. What used to be perfectly okay is agreed upon by our entire society as unacceptable. Moreover, we've made it not just unacceptable, people believe it is wrong to do it. When you say pollution is wrong, it becomes a moral judgement

When you're talking morals, risk-benefit language becomes useless

6. Trustworthy vs Untrustworthy

People believe we are arrogant, dishonest. Be responsive, not responsible.

Conclusions

1. People respond more to outrage than hazard. Even when hazard is low, risk is high.
2. People don't listen to risk data when experiencing high outrage. They ignore it or mine it for ammunition. Data issue vs. power issue. Who is in control.
3. Assuming hazards are low, outrage must be lowered, too.
4. Sara Title 3 is an opportunity, not a burden.

find out what people want to know--focus groups

1. How safe is it? Give them some risk estimate--numbers.
2. How do you know? They will be skeptical. Explain uncertainty. That we round up. That our estimates are the absolute worst it could be.
3. What are you doing about it? Tell them what you've done already and Vista has done a lot. Explain management strategy--if the numbers are too high, get them down. What you plan to do. What government and community have been doing with CAER.

4. What can't you do? Be explicit. Technology limited. Cost far too much.

5. What can the public do? Share the knife. Company had cut emissions as much as possible. Engineers said that any more cuts would not be cost effective. So company gave outside committee budget of $2 million to see what they could do. Engineers came back and said, well wait a minute. Maybe we can come up with something. And besides, anything they come up with will be stupid. It won't be.

6. What is this stuff anyway. What the stuff is like. What it is used for. Revise MSDS's so they can be read by average citizen.

7. Why didn't you tell us sooner. The only answer is we should have. We didn't trust the public. That was dumb. You have a right to know. We're not going to do it any more.

8. How can we trust you? We don't expect you to and you don't have to anymore. There are plenty of other people involved in the process now. Environmentalists, government officials, agencies. If you don't believe us, ask them.

9. Don't you care? You need to cross the bridge between engineering, data-oriented person and the feeling, data-distrustful person, often a female. All your training has been away from this. You better learn to think their way, too.

How easy you make to to get to the data will directly affect how serious they will view the problem. One company is putting a computer with data, air modeling, etc. in the public library. It will be so familiar, hopefully the company won't be tarred and feathered. Make the data readily available.

How to communicate about the numbers.

Don't compare risk to cigarette smoking. When you compare what you do to people with what they choose to do to themselves, you make them furious. You tolerate x, x is worse that what our company does to you, therefore you have to tolerate what we are doing to you. That doesn't compute.

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What works

1. Comparisons of same risk at two different times. We're emitting 40 percent less than we did two years ago.
2. Comparison with a standard. What we're doing vs. the OSHA standard or the EPA standard.
3. Comparison of estimates.
4. Comparison of risk of doing something vs. the risk of not doing it and shutting down.
5. Comparison of alternative solutions. Landfill vs. incinerators.
6. Comparison with same risk elsewhere. Here vs. Denver.

Conclusions

1. Make all the numbers available, readily available, but don't emphasize them.
2. find out what people want to know
3. Don't let preoccupation with numbers keep you from showing you care.
4. Use comparisons to explain the numbers.

A

Audiences

1. Employees, retirees and their families, and other plant-related people
2. People near the plants. They shouldn't hear it on TV
3. Environmental activists. They are still undecided about whether to use the information to try to shut us down.
4. Health professionals, schools, experts of one sort or another.
5. Senior citizens, ill people, and other especially vulnerable population groups.
6. Emergency response people
7. Government officials. Just enough to brief and reassure, but don't get too close. They want to be seen as independent.
8. Media. Notice they aren't first.