

## The Society of Chemical Manufacturers and Affiliates (SOCMA) Meeting with Administrator Pruitt

**Meeting Objective:** Brief Administrator Pruitt and staff on the specialty chemicals industry. Specifically, SOCMA wishes to address four high-level issues and four specific rules under EPA jurisdiction.

**Specialty Chemicals Industry:** SOCMA is the only U.S.-based trade association dedicated solely to the specialty chemical industry. Our member companies make the products and refine the raw materials that make our standard of living possible. SOCMA member companies employ more than 100,000 workers across the country and produce some 50,000 products – valued at \$60 billion annually. From pharmaceuticals to cosmetics, soaps to plastics, and all manner of industrial and construction products, SOCMA members make materials that save lives, make our food supply safe and abundant, and enable the manufacture of thousands of other products.

### **Meeting Participants:**

Jennifer Abril, SOCMA, President and CEO

Robert F. Helminiak, SOCMA, Managing Director of Government Relations

David Doles, Lonza, Inc, Senior Vice President, Global Head of Business Unit – Materials Performance & Protection (SOCMA Chairman)

J. Steel Hutchinson, GFS Chemicals, Owner and President (SOCMA Past Chairman)

John Foley, KMCO LLC, President and CEO

Beth Bosley, Boron Specialties, LLC, CEO and Founder

David Grimme, Baker Hughes, Inc, Vice President, CIS Supply Chain

### **EPA Directional Issues:**

1. **Assumption of Good Intent:** Despite continuous safety and environmental improvements the prior administration assumed that companies were not operating with good intent. The industry hopes to build a relationship with EPA that extends from federal policy development to facility inspections (where EPA traditionally assumes industry to be a bad actor). SOCMA member companies prioritize the health and safety of their workers and the environment and seek to work in partnership with EPA to assure compliance.
2. **Consistency in Enforcement:** The industry seeks consistency in enforcement of TSCA, FIFRA, and RCRA regulations. SOCMA member companies historically have experienced inconsistent interpretation and application of regulations by federal, state and regional inspectors.
3. **Cost Benefit Analysis:** The specialty chemicals industry strongly believes that economic analyses must fully reflect costs to industry, and weigh those against the environmental and safety gains of regulations. EPA analysis should quantify the gains made from previous rulemakings and the projected gains from new rulemakings to fully balance the cost benefit analysis.
4. **Engaged and Funded Agency:** A properly engaged and funded EPA is essential to the specialty chemicals industry. SOCMA depends on the timely approval of new chemicals to continue to advance innovations in chemistry and the quality of life of Americans. Further, SOCMA strongly supports federal regulation of hazardous chemicals because a patchwork of state legislation and regulations creates unmanageable hurdles and costs, and disrupts business continuity.

### Specific Regulations:

1. **Toxic Substances Control Act:** Timely review by EPA of new chemicals is critical to industry success and innovation; SOCMA is concerned that EPA has altered the review of new chemicals and dramatically slowed down the review process. Further, EPA has inexplicably raised the standard of the low volume exemption. In both cases, LCSA should not have impacted the review process and SOCMA strongly encourages EPA to return to the broadly excepted review process.
2. **Risk Management Program:** The Risk Management Program rule (RMP) finalized under the Obama Administration needs significant review, and implementation should be delayed because while the rule is intended to improve safety and security it could inadvertently increase security risks. SOCMA is supportive of EPA's current rulemaking to delay the effective date to February 19, 2019 and has testified in front of EPA on April 19, 2017 and subsequently submitted comments.
3. **Hazardous Waste Generator Rule:** The Hazardous Waste Generate rule alters the way a company qualifies as an unpermitted hazardous waste storage facility. SOCMA and others are engaged in litigation on the rule. SOCMA strongly encourages EPA to search for a solution outside the courtroom.
4. **1-In-2-Out:** SOCMA is strongly encouraged by and supportive of President Trump's 1-In-2-Out Executive Order. SOCMA participated in a public meeting (April 25, 2017) and submitted comments on the matter, including a list of regulations that we recommend for modification or elimination under the EO.