

Chlorine *(continued from page 3)*

Elimination of chlorine would lead to the disappearance of countless valuable products such as medicines, crop protection chemicals, computers and construction materials. It would also have public health implications, as chlorine and chlorinated products play a crucial role in water disinfection. According to the World Health Organizations, 25,000 children die every day of diseases carried by impure water.

"It should be noted that the search for chlorine substitutes would be a long and expensive process, and needs to be approached with a careful analysis of risk/benefit criteria," said Stearns. "There are no proven cost-effective alternatives for many chlorine-based products, and no one can ensure that substitutes would not harm human health and the environment."

Dow has expressed its position on these public policies through the Chemical Manufacturers Association and a grassroots letter writing campaign. This message has been heard by many legislators. Recently, the Senate Environment & Public Works Committee approved the Clean Water Act without a chlorine amendment. The bill, however, is scheduled for debate on the Senate floor in June. Chlorine is expected to be part of that discussion.

We hope you have enjoyed this issue of your CAP Newsletter. Please send comments to Pat Brink at 2020 Dow Center, Midland, Michigan, 48674, or call (517) 636-5787.

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CAPS ... Panels Consider the Issues

- Panel members at Dow's Sarnia location learn about historic contamination at the Scott Road landfill and give feedback to Dow management concerning educational opportunities and an appropriate approach for public disclosure of information concerning this issue to the community.
- Plaquemine CAP members discuss the December 1993 perchloroethylene dry cleaning fluid spill and Dow's plan to prevent similar incidents in the future.
- Allyn's Point members hold a lively discussion after Dow presentation regarding chlorine and consequences of government regulation.

CAPS ... Dow Management Speaks

Tony Gryseels, Site Manager at Allyn's Point, Connecticut, addressed the Global Environmental Management Initiative (GEMI) conference, stressing that panel member participation allows: 1) transition from outreach and communication to interactive dialogue, 2) third-party validation of Responsible Care® progress, 3) better management introspection with regard to company policy, and 4) increased understanding of public perception resulting in more effective communication.



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CAP NEWS & VIEWS

Community Advisory Panels



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Environmental Justice – Coming Soon to Your Hometown

An Open Letter to CAP Members, Facilitators and Dow Representatives

A growing number of national and grassroots organizations contend that minority and low-income communities are disproportionately affected by pollutants from industrial and waste management facilities and abandoned waste sites. They assert that these communities are home to the majority of such facilities; that current standards do not protect against cumulative health impacts; that these communities experience reduced government enforcement of environmental laws and regulations, lower penalties, and slower and less protective cleanups. Advocates also say that such facilities have been and continue to be sited in such areas specifically because the communities are poor, minority and politically powerless. These are the principle concerns embodied in a movement known as, "environmental justice," "environmental equity" or "environmental racism."

The purpose of this letter is simply to increase your awareness of this emerging issue. In addition, it occurs to me that our Community Advisory Panels may offer an excellent forum for addressing environmental justice issues since they are designed to be representative of and responsive to the scope of diverse interests in and around our site communities. This may be an opportune time to review the membership of your panels to assure complete representation of your community.

On February 11, President Clinton issued the "Executive Order on Federal Actions To Address Environmental Justice In Minority Populations And Low-Income Populations." In effect, this executive order requires most, if not all, federal agencies to develop an environmental justice strategy within the next 12 months. This action virtually guarantees that any new federal legislation will address environmental justice.

Given Dow's continuing priority for being responsive to the interests of our communities, we need to take steps to better understand this issue and its implications for our operations.

I have asked John Musser, director of Public Issues & Corporate Issues Communications, to become Dow's focal point for this issue. He will provide you with information to develop a knowledge base for an effective strategy to address potential local and plant community environmental justice concerns.

Sincerely,

Dennis Heydanek

Dennis M. Heydanek
Director, Global and North American Issues Management



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- Pittsburgh CAP members review the options for community emergency notification systems slated for installation within one and one-half years. In addition to chemical incidents, the system will alert the public to emergencies such as wild fires, earthquakes and missing children.
- Results of Freeport CAP member survey show confidence in the CAP process and recognition of the commitment from Dow and members. Copies of the survey report are available

CAPS ... Panels Are Active

from Peter Bowman at (713) 486-7541.

- At CAP suggestion, Dow forms a West Bank Purchasing Policy in Louisiana — resulting in a 100% increase in local purchases to \$61 million over the past four years. Freeport reports a \$15 million increase in local purchases for 1993, as compared to 1992.

- Dow's Midland CAP prepares a list of questions for Dow management on potential issues relative to the company's discharge into the Tittabawassee River. The questions address river quality, Dow discharges, sediment figures, fish quality and the biological health of the river.
- Panel members participate in Responsible-Care® Week held at Texas Operations.

CAPS ... Ask "Joe Prevention"

Members of Dow Latin America's first CAP located in Guarujá, Brazil, are determined to work with their community on emergency preparedness and response. CAP members devote considerable personal time researching data and information needed to prepare "maps" which cover areas of potential risk, resources and demographic density. These maps are now being used by local emergency response authorities. In addition, members work to educate elementary school students on safety and accident prevention using a friendly cartoon character who invites children to become members of the "Joe Prevention Club." Community leaders view these programs as positive and helpful, giving Dow good marks for safety and environmental leadership. Further information is available from Claudio Fioranti, Sao Paulo, Brazil, 55-11-546-9072.

ACIDENTES MAIORES

Quando se trata de grandes acidentes, a sua decisão deve ser urgente. AVISE O CORPO DE BOMBEIROS.



Translations:

Top: "When a major accident is the case, your decision must urge — CALL THE FIREMEN."

Center: "Comply with all the instructions from Firemen, Policemen, Civil Defense and Mutual Help Plan Authorities."

CAPS ... Members Express Views

"Added a new level of accountability to the public through direct contact that might not be realized otherwise."

— Freeport

"Opportunity to express concerns with belief they will be heard and addressed in some form."

— Freeport

"The words 'no environmental impact' are emotionally-charged trigger words that smack of a cover-up."

— Sarnia

"I feel we know you now. If you want to know something I hope you will call me."

— Sarnia

"You have to realize that you make hazardous, poisonous chemicals, and you will never be perceived as being squeaky clean."

— Sarnia

"Environmental statistics seem dry to me, they go in one ear and out the other, but they are a necessary evil."

— Freeport

Editor's Note: Several Dow CAPs are discussing the Chlorine Issue, including chlorine's effect on the environment, on Dow and its manufacturing sites, and on the economy in general. In light of your discussions, we felt the following article, "Chlorine...Public Policy Debate," highlighting events regarding reauthorization of the Clean Water Act and recent recommendations of the International Joint Commission, would be of interest:

Recommendations released recently by the United States Environmental Protection Agency (U.S. EPA) and the International Joint Commission (IJC) would drastically reduce or eliminate the use of chlorinated compounds. The socio-economic ramifications of such sweeping measures would be widespread.

On February 1, 1994, the U.S. EPA announced its plan to revise the Clean Water act. One of the recommendations is a startling provision to study chlorine and chlorinated compounds in order to develop a "national strategy for substituting, reducing or prohibiting" the use of chlorine chemistry. This represents an abrupt about-face on the part of the EPA, which had rejected IJC's 1992 recommendation to ban the use of all chlorine compounds without further study.

"Industry's concern with the Administration's announcement is that the EPA has not asked for the study to determine whether a chlorine phase-out is necessary, but when and how a phaseout strategy will be developed," said Joe Stearns, director, Chlorine Issues, The Dow Chemical Company. "We need to ensure that public

Chlorine ... Public Policy Debate

policy decisions are based on the data in hand, not on predetermined conclusions."

Dow agrees that more study is needed for those chlorinated compounds as well as other chemical compounds that are persistent, toxic and bioaccumulative. However, according to the results of an independent scientific study conducted by CanTox, Inc., extending concerns to the entire class of chlorinated organics is unnecessary.

On the heels of the EPA announcement, the IJC issued a reaffirmation of its earlier recommendation to sunset the use of chlorine and chlorinated compounds as industrial feedstocks. The IJC is a policy advisory body responsible for monitoring progress in the United States and Canada on implementation of the Great Lakes Water Quality. In its Seventh Biennial Report on Great Lakes Water Quality, IJC claims there is a "critical and urgent need" for an effective strategy to virtually eliminate persistent toxic substances from the Great lakes, and concluded that virtually the entire class of organochlorines should be treated as such and addressed collectively.

Industry has been encouraged by the Commission's long-standing focus on persistent toxic substances which are proven to be harmful to human and ecosystem health, but is concerned by the Commission's conclusion that all chlorinated compounds are persistent toxics.

"Studying the impact of chlorine-based chemicals on the environment is an ongoing

process," said Stearns. "If those studies were to indicate that the risks outweigh the benefits, Dow agrees that we should look at appropriate phaseouts and, in fact, has done that in some cases. Currently, however, there is no evidence that would support a total ban of chlorine chemistry."

Chlorine, a naturally occurring element, is a fundamental building block chemical used in thousands of applications. According to a recent independent study by Charles River Associates, nearly 40 percent of the U.S. gross national product is in some way reliant on chlorine chemistry. Close to 45 percent of all U.S. industries use chlorine and related compounds, generating some 45 million jobs and \$1.6 trillion in economic activity.

The world's largest producer of chlorine, Dow uses 90 percent of the chlorine it manufactures internally — to produce hundreds of products. In some cases, chlorine is used as a reactive agent to produce a material, but does not become a component of the material. In others, chlorine actually becomes part of the final product. Either way, consumers who use chlorine-based products have minimal contact with chlorine in its elemental form.

"We do not take the potential risk of chemicals lightly. We support good science and pollution prevention programs to protect our ecosystem and the people who live in it. But we have serious concerns about banning all chlorine and chlorine containing compounds on the basis of assumption rather than good science," said Stearns.

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