

Manufacturing Chemists Association

Minutes of Meeting

AIR QUALITY COMMITTEE

Sherman House Hotel

Chicago, Illinois

May 10-11, 1972

MEMBERS PRESENT:

W. F. Bixby, Chairman	B. F. Goodrich Chemical Co.
J. H. Huguet, Vice Chairman	Ethyl Corporation
M. V. Anthony	Stauffer Chemical Company
W. B. Barton	Borden Chemical Division of Borden, Inc.
J. G. Brown	Climax Molybdenum Company
W. R. Chalker (5/10 only)	E. I. du Pont de Nemours & Co.
J. S. Eckert (5/10 only)	Norton Chemical Process Products, Div. of Norton Co.
E. W. Kleppinger (5/10 only)	Celanese Corporation
W. L. Mann	N L Industries, Inc.
R. L. Maycock	Shell Chemical Company
P. W. McDaniel	Union Carbide Corporation
E. G. Opdyke	Kay-Fries Chemicals, Inc.
A. H. Phelps	The Procter & Gamble Company
T. H. Rhodes	Enjay Chemical Company
L. W. Roznoy	Olin Corporation
J. C. Schwegmann	Kaiser Chemicals
W. R. Taylor	Diamond Shamrock Chemical Co.
M. B. Tohline	Mobil Oil Corporation
F. W. Velguth (5/10 only)	CPC International, Inc.
C. R. Walbridge	Allied Chemical Corporation
E. P. Wheeler	Monsanto Company
K. D. Johnson	MCA Staff

MEMBERS ABSENT:

C. B. Beck	Cabot Corporation
Z. G. Bell, Jr.	PPG Industries, Inc.
J. P. Butler	Kawecki Berylco Industries, Inc.
R. E. Chaddock	Hercules Incorporated
C. G. Kramer, M.D.	The Dow Chemical Company
E. D. Lemon	United States Borax & Chemical Corporation

MEMBERS ABSENT (Continued):

R. H. Mansur	Reynolds Metals Company
J. H. Morris	Merck & Co., Inc.
S. S. Paist	Rohm and Haas Company
J. H. Rook	American Cyanamid Company
J. Wilkenfeld	Hooker Chemical Corporation
D. C. Winson	Eckert, Seamans, Cherin & Mellott
J. H. Yeager	Mallinckrodt Chemicals Works

GUESTS PRESENT:

C. Bartell (5/11 only)	Borden Chemical Division of Borden, Inc.
D. B. Coghlan	Foote Mineral Company
R. J. Dilks (5/11 only)	Stauffer Chemical Company
B. E. Eley	Monsanto Company
Elinor Fahrenholz (5/10 only)	Chemical Industries Council of the Midwest
A. Katona	Hooker Chemical Corporation
O. Kile (5/11 only)	Stauffer Chemical Company
E. N. Miner (5/11 only)	Borden Chemical Division of Borden, Inc.
H. W. Perrault (5/11 only)	Stauffer Chemical Company
G. W. Prehler (5/11 only)	Stauffer Chemical Company
H. D. Trietsch (5/11 only)	Stauffer Chemical Company
Jim Turner (5/10 only)	MCA Staff

I. COMMITTEE MEETING, Session I1.0 Minutes of the Meeting of January 26-27, 1972

With the correction of the attendance report to indicate Mr. W. L. Mann's attendance on January 27th, the minutes were otherwise approved as issued.

2.0 Membership Changes - Secretary

The secretary reported that the nomination of

Mr. T. H. Rhodes
Corporate Environmental Conservation
Adviser
Enjay Chemical Company
P. O. Box 3272
Houston, Texas 77001

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had been approved by the MCA Board, and that their consideration of the nomination of

Mr. D. B. Coghlan
Foote Mineral Company
Route 100
Exton, Penn. 19341

was on their agenda for their June meeting.

3.0 MCA Board Liaison - Chairman

Mr. Bixby reported the postponement of the meeting of the Board Liaison Committee with the technical committee chairmen, previously scheduled for the May meeting of the Board. This meeting will be rescheduled for early fall; Mr. Gerstacker has asked the technical committees involved to give their serious consideration to the development of a performance rating system by which corporate performance in the areas of environmental protection could be given a rating on a numerical scale, and he hopes for a report of substantial progress toward such goal by their fall meeting.

Mr. Bixby also reviewed, for the benefit of our more recent additions to the Committee, the history of liaison efforts between the Air Quality Committee and the Board, and the formation in 1969 of a Board Liaison Committee to maintain an overview of the activities of the Association's technical committees, with responsibilities in the areas of environmental protection. These committees are:

Air Quality Committee
Food, Drug, and Cosmetic Chemicals Committee
Labels and Precautionary Information Committee
Occupational Health Committee
Safety and Fire Protection Committee
Solid Wastes Management Committee
Water Resources Committee.

He also related the change in focus of committee activities as a result of the passage of federal legislation in the last few years, and the reorganization of federal administrative agencies under the Environmental Protection Agency. He stressed the need for intercommittee coordination

of all MCA activities relating to a single federal agency, such as EPA. In our dealings with that agency, he noted, our most pressing need is a level of liaison that will enable us to be aware of pending administrative developments at a stage in their evolution at which technical input may be persuasive in the formulation of their proposals.

4.0 Report from the Joint Subcommittee on Environmental Law - Secretary

The Committee was informed of the decision of the Joint Subcommittee on Environmental Law not to join the Air Quality Committee at its Chicago meeting, but to meet in New York on May 23rd. Copies of the minutes of that meeting will be available to the members of the Air Quality Committee early in July.

5.0 Report from the Ad Hoc Committee on Chemicals Regulation - Dr. Anthony

Dr. Anthony reported on the problems that had been experienced in attempting to secure a consensus among the MCA member companies on the extent to which they should compromise their initial positions in an effort to secure improvements in the Senate bill, when there was no assurance that the bill would be taken up by the House at this session. The bill was reported out of the Senate Committee on Commerce on May 5, under the Administration bill number, S. 1478, but completely rewritten. It represents a compromise version of the Spong Amendment No. 338, which it follows closely in format. Although it incorporated MCA-suggested language in a number of sections, with what we feel to be improvements in clarity and concept, it retains a number of features highly objectionable to the chemical industry, and judged by us to be contrary to the best interests of both industry and the public. Major provisions we continue to oppose are:

(1) the provision that all new chemicals must undergo premarket testing in the absence of a positive finding to the contrary by the Administrator, rather than allowing the Administrator to require, on a selective basis, the testing of those classes and uses of new

6.1 Meeting of the Advisory Committee

The first meeting of the technical advisory committee was held on March 23, with fifteen members present, including four who are also members of the Air Quality Committee (Messrs. Bixby, Chalker, Maycock, and Rhodes). Other members included representatives of the petrochemical industry, equipment manufacturers, and of the state and federal agencies.

The Houdry Division of Air Products and Chemicals was introduced as the prime contractor for the task of coordinating the technical information collection and analysis required by EPA for their task of formulating proposed standards of performance for selected processes of the petrochemical industry.

6.2 Development of Industry Questionnaire

Mr. Rhodes reported that a priority task of the contractor, with the advise of the committee, was the development of a questionnaire for the solicitation of process and emissions data from the industry. The draft questionnaire is to be submitted to the members of the advisory committee for approval before it goes to the Office of Management and the Budget. Initial distribution (which is planned to be implemented on a process-by-process basis) is targeted for July. Air oxidation processes, and those with highly volatile products, are scheduled for early attention.

6.3 On-Site Test Program

Fifteen processes are to be subjected to EPA confirmation of industry data by investigation by field teams to do on-site monitoring and emissions analyses. Three such processes that have already been selected are acrylonitrile, carbon-black, and oxychlorination of ethylene.

These studies, which are being conducted under the authorities created by section 114 of the Clean Air Act, as amended, will provide industry with no immunity from self incrimination, and emissions data secured in these studies are specifically designated in that section as beyond the protection of the confidential data provisions of the Act.

The field test program is expected to get under way in September, and to be completed before the end of March, 1973.

The text of Mr. Rhodes' report is reproduced in Appendix C.

7.0 Subcommittee and Task Group Assignments

7.1 Standing Subcommittees

7.1.1 Technology and Engineering Subcommittee

The agenda items to be considered by this subcommittee were announced as including:

(a) the review of the draft of the Proposed Performance Specifications for Stationary Source Monitoring Systems for Sulfur Dioxide and Nitrogen Oxides and Visible Emissions;

(b) the review of Dr. Maycock's paper on ambient air, versus stack sampling;

(c) a discussion of the final editorial revisions to Mr. Joseph Coon's report on visible emissions;

(d) consideration of implications to the chemical industry of the impending U.S. energy crisis; and

(e) the development of recommendations on content of, and support for, the 1972-73 A. D. Little project on chemical odors.

7.1.2 Information and Publications Subcommittee

The chairman announced that, in the absence of the Subcommittee chairman, Mr. Butler, the meeting of the Subcommittee would be presided over by Mr. James Turner.

7.1.3 Standards and Abatement Programs Subcommittee

Among the matters to be considered by this Subcommittee, the following items were given special mention:

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- (a) sulfur-in-fuels tax proposals;
- (b) noise control legislation and regulatory standards;
- (c) development of proposed standards of performance for petrochemical processes;
- (d) industry efforts on toxic substances control legislation; and
- (e) a review of the legislative liaison efforts of this Committee, and consideration of revised procedures to increase its effectiveness.

7.1.4 Education and Training Subcommittee

The Subcommittee was asked to give careful consideration to Air Quality Committee plans in regard to (a) an electrostatic precipitator workshop, and (b) a technical symposium series on air pollution controls for chemical processes.

7.2 Special Subcommittees

7.2.1 Meeting Site Selection Task Group

Mr. Joseph Brown was named chairman of a task group to recommend a meeting site for the 1973 spring meeting of the Committee. Messrs. E. P. Wheeler and F. W. Velguth were designated to assist in this task.

7.2.2 Nominations Subcommittee

Dr. Anthony, reporting for the absent Mr. Wilkenfeld, announced that the nominations subcommittee had completed its deliberations and would be submitting the names of J. H. Huguot, as their candidate for committee chairman, and M. B. Tohline as vice chairman.

II. REPORTS OF THE SUBCOMMITTEES

1.0 Reports of the Standing Subcommittees

The texts of the subcommittee reports are incorporated in these minutes as Appendix A. The following materials relate to the discussions of, and actions taken upon, these reports as they were submitted for the consideration of the full Committee.

1.1 Technology and Engineering Subcommittee

Mr. Tohline reported that the Subcommittee had recommended that MCA accept the A. D. Little proposal outlined as Alternative Program III in their letter proposal of April 25 under the subtitle

"(3) Expert Analysis

"As we have indicated in our preliminary report, we believe that we can make effective use of the present test chamber to:

"* examine the dose-response relationship of several selected materials which appeared from our previous work to be important in odorous air pollution;

"* explore the ability of trained analysts to discriminate between various concentration levels of odorant particularly where the perceived intensity is strong;

"* examine perceived intensity as a function of concentration, duration and odorant type as well as in the presence of controlled background odor.

"In any or all of these situations, we would plan to explore alternative methods for recording responses such as be scaling or direct verbal communication. This type of program is probably the most efficient for obtaining information regarding human response to various types of odorant stimuli but has the drawback of not representing a general population's impressions of odor.

"We recommend a program based on the approach outlined under item (3). This might be augmented by a limited amount of testing with naive subjects in order to assess their hedonic response in a preliminary way."

CMA 086041

Acceptance of the recommendation of the Subcommittee in regard to the A. D. Little project support at the \$40,000 level was moved, seconded and carried.

Mr. Tohline announced plans for a meeting of an Ad Hoc Task Group to consider the proposed "Performance Specifications for Stationary Source Monitoring Systems for Sulfur Dioxide and Nitrogen Oxides and Visible Emissions" on Wednesday, May 24, in Washington, D. C. He asked that companies interested in this problem and with available expertise in the areas of instrument operations or performance specifications, or in sampling statistics, to forward to him and to MCA the names and titles of the men they planned to send to the meeting.

1.2 Report of the Information and Publications Subcommittee - James Turner for J. P. Butler, Chairman

The Subcommittee expressed its approval of the MCA statement presented at the March 16 hearings in Houston on the U. S. Agenda for the United Nations Stockholm Conference on the Human Environment. Their recommendation that the Air Quality Committee ask MCA to attempt to secure wider distribution of this document, including, if possible, publication in a scientific journal of wide readership, was approved by motion duly made, seconded and carried.

Their recommendation in regard to the commissioning of noted academicians to prepare papers on the various aspects of the impact of environmental controls on U. S. industry was similarly approved. The new chairman was asked to name a task group in response to the subcommittee recommendation and to ask the MCA Board for contingency funds (up to \$5,000) for this project when suitable progress has been made toward defining the task and lining up potential authors.

The Committee also approved the recommendation that it should seek ways to encourage a more effective and wider participation of plant managers and other local chemical company executives in "grass roots" liaison with legislative and regulatory officials.

1.3 Report of the Subcommittee on Standards and Abatement Programs - W. L. Mann, Chairman

1.3.1 Rating System for Environmental Protection Performance

The negative subcommittee recommendation, with respect to both the presently proposed rating plans, and the Board efforts to develop such a plan, were discussed at length. The rating plan offered by Mr. Chalker was rejected, and no more acceptable plan was proposed from the floor. The full Committee approved the recommendation that the Board be notified of the opposition of the Air Quality Committee to MCA sponsorship of such a rating system.

1.3.2 EPA Studies of the Petrochemical Industry

The full Committee, by motion duly made, seconded and carried, asked that MCA convey to the Environmental Protection Agency its concern that their policy of placing industry study contracts with firms having a vested interest in that industry was a source of serious potential problems involving conflicts of interest, and urge that such practices be ceased.

1.3.3 Legislative Liaison

The recommendation that legislative liaison efforts of the Committee be restructured to organize them on an EPA regional basis was approved by the full Committee.

1.3.4 Noise Legislation and Regulatory Developments

The Committee directed that, in response to the suggestions of the Subcommittee, that the Secretary place a report from Mr. Phelps on this topic in the agenda for the September meeting of the Committee.

1.4 Report of the Education and Training Subcommittee - A. H. Phelps, Chairman

1.4.1 Workshops

An informal survey among those present of potential interests in the electrostatic precipitator and monitoring instrument workshops suggested by the Subcommittee indicated insufficient potential attendance to justify present scheduling. With respect to the latter, views were expressed that greater interest and need would develop as soon as the various control agencies imposed wider monitoring requirements.

1.4.2 Air Pollution Control Technical Seminars

The Subcommittee announced its approval of continued efforts on the part of MCA staff to work out acceptable contractual details with Roy F. Weston, Inc. for the holding of a seminar series. Although no formal action was taken by the Committee on the grounds that their previous actions on this matter were still valid, neither were there any views expressed in opposition to this course of action.

2.0 Reports of the Special Subcommittees

2.1 Report of the Subcommittee on Programs and Goals - Dr. Anthony, Chairman

The Subcommittee recommended that a two-day session of an expanded subcommittee be held in Washington, on August 2 and 3, with attendance by invitation from the Committee chairman. Its recommendation was adopted by the Committee by motion duly made, seconded and carried.

2.2 Report of the Meeting Site Task Group - Joseph Brown, Chairman

Mr. Brown reported as the sole recommendation of the task group the selection of Atlanta, Georgia as the site for the spring, 1973 meeting of the Committee. This site was recommended on the basis of its status as an EPA regional headquarters city, its central location and excellent transportation facilities, the extensive chemical interests in the southeast and the extended interval since the last meeting of this Committee in that region.

The Committee adopted the recommendation, and asked that the chairman designate Mr. A. H. Phelps to arrange for attendance of agency personnel at the luncheon function.

3.0 Report from the Public Relations Department - James Turner

Mr. Turner announced the scheduled appearance of the Maycock paper on monitoring in the June issue of ChemEcology, and expressed interest in receiving additional articles of similar caliber.

He indicated that a new edition of the MCA "background paper" of perhaps 16 pages in length, should be available in a few months.

The first edition of an industry speakers' source book on environmental matters, containing quotable extracts from speeches and papers from credible authors was announced as now available to MCA members. He commented with particular approval on an article by Peter Drucker from the January edition of Harper's Magazine, and which was condensed for the April Readers' Digest.

Another article to which he directed the attention of the Committee was that by David Rockefeller.

4.0 Liaison with Other Organizations

4.1 Air Pollution Control Association

Mr. Huguet called to the attention of the Committee the approaching annual meeting of the Association on June 18-23, in Miami Beach. Mr. Phelps reported that the Technical Council of the Association is arranging to have an opportunity to review proposed EPA regulations on new sources before these appear as regulatory proposals in the Federal Register. He urged industry members of the APCA to participate in this review function.

Mr. Phelps recommended that, under current circumstances, APCA Technical Information Committee No. 2 be dropped from the routine liaison report list.

4.2 American Institute of Chemical Engineers

Mr. Huguet reported that the Institute is planning to publish collections of papers that have been presented at their pollution control symposia. The volume of all 1971 Air papers is expected to be available by early summer.

The schedule of AIChE air pollution control training courses for the last half of 1972 will be forwarded to the Committee by early July.

4.3 American Paper Institute

Mr. Phelps reported that the Institute is now conducting a survey among its members on the costs to the industry of the emissions tax proposed by Senator Proxmire and of the various sulfur emission taxes now before the Congress.

4.4 American Petroleum Institute

Mr. Tohline described API activities in working with EPA toward the development of Standards of Performance for new refineries; he expressed their continuing concern over the development of legislation and/or regulations imposing large, or unlimited liability for oil spills. Mr. Huguet told the Committee of their efforts to secure a broader understanding of the implications of the impending energy crisis. Routes to synthetic natural gas are of particular interest to them.

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4.5 American Society of Mechanical Engineers

Mr. Phelps reported that both their Air Pollution Division and their Air Pollution Standards Committee were trying to establish closer liaison with EPA. Their recent divisional symposium in Cincinnati was well attended, with good audience participation in its workshop format.

4.6 National Paint and Coatings Association

The Secretary called to the Committee's attention the excellent work being done by that Association in keeping its members informed of developments in legislation or regulations pertaining to photochemically reactive solvent emissions.

4.7 EPA Office of Air Programs

The Secretary mentioned the prevalence of rumors to the effect that the post now occupied by Dr. Middleton will be abolished, and that Dr. Middleton will be leaving EPA.

The announcement of EPA proposed regulations to repair the defects in state implementation plans, and the schedule of public hearings for their consideration are expected soon. The Secretary was asked to distribute this information to the Committee as soon as it is available.

4.8 Changes in Reporting Status and Procedures

4.8.1 Organizations to be Dropped

It was moved, seconded and carried that the Society for Automotive Engineers and APCA Technical Committee No. 2 be dropped from the routine liaison reporting list.

4.8.2 Organizations to be Added to Reporting List

Mr. Tohline was asked to serve as liaison reporter for the Edison Electric Institute. Mr. E. P. Wheeler was asked to accept a corresponding role for the American Industrial Hygiene Association.

4.8.3 Change in Reporting Procedure

The Secretary was instructed to set up a procedure whereby each member with liaison reporting responsibilities was to be sent a reminder notice and reporting forms on a timely basis before each meeting of the Committee. MCA would then reproduce these reports for distribution before the meeting, and oral reporting would be limited to the elaboration of topics referred to in the written reports, where such added explanations were requested by the Committee.

4.8.4 Liaison among Trade Associations

CMA 086047

Mr. Bixby asked that the new officers consider reactivation of the informal meetings held with the technical committee officers and staff men of the

trade associations with common interests in air pollution control activities. These meetings had been initiated by Dr. Anthony when he was chairman.

5.0 Reports of Developments in the States

Liaison reports received by the Secretary prior to the publishing of these minutes are reproduced in Appendix B.

Mr. Tohline reported that the New York State Chemical Industry Council had voted to suspend operations, and would no longer be a source of liaison with that state.

The Chicago Chemical Industries Council, on the contrary, was reported as very active, particularly in the areas of secondary education, with programs in career guidance and environmental protection. Their speakers panels were credited with reaching forty or fifty schools each year.

6.0 Election of Officers

The slate proposed by the nominations subcommittee, i.e. J. H. Huguet, Chairman, and M. B. Tohline, Vice-Chairman, were unanimously elected to these respective posts. Their terms of office will be from June 1, 1972 through May 31, 1974.

7.0 Introduction of Program of New Officers

After Mr. Bixby had extended his congratulations to the new officers, and had thanked the Committee members for their support and contributions during the past two years, Mr. Huguet briefly outlined his plans for the immediate future. He stressed the dominant role that the recommendations developed by the planning subcommittee, at their August 2-3 meeting, would have in the formulation of the new Committee program. He urged their careful consideration of the responsibilities of the Committee to the broader MCA membership as they developed their recommendations, rather than merely the interests of the smaller group constituting the Committee.

III. LUNCHEON MEETING WITH AGENCY AND INDUSTRY GUESTS

After lunch, Mr. Ronald J. Mersbergen, Principal Air Contact in the Air and Water Programs Division of the EPA Office for Region V, in Chicago, spoke briefly on EPA planned programs relating to air pollution controls.

After expressing the regrets of Mr. Mayo, regional director, that he could not be present, Mr. Mersbergen outlined EPA plans in two broad areas -- the approval, and where necessary, the supplementing of state implementation plans, and the development of Standards of Performance for New Stationary Sources for industry classifications represented in Region V.

The Region V states were listed as Illinois, Indiana, Minnesota, Michigan, Ohio, and Wisconsin. All have submitted implementation plans, but none are expected to be acceptable as meeting all the applicable statutory and regulatory standards. However, major portions are expected to be approved. Extensions of time to achieve primary air quality standards for one or more pollutants have been requested by Indiana, Minnesota, and Ohio. All the state plans lacked, in some degree, the regulatory authority required by the Clean Air Act, but in general the plans were regarded as major starts toward fully acceptable programs.

The remarks of Mr. Mersbergen regarding Federal emphasis on national standards, under sections 111 or 112 of the Clean Air Act, confirmed the information received by the Committee when it met at the National Environmental Research Center at Research Triangle Park in North Carolina last January. Reference is made to the minutes of that meeting for details of the proposed EPA programs.

Mr. Mersbergen answered questions on programs and schedules for control efforts of particular interest to the chemical industry.

Respectfully submitted,

Kenneth D. Johnson / KDJ
Kenneth D. Johnson, Secretary
Air Quality Committee

Minutes Subject to Approval
KDJ:mkb
June 30, 1972

CMA 086049