

UNION CARBIDE CORPORATION
CHEMICALS & PLASTICS GROUP
HEALTH, SAFETY & ENVIRONMENTAL AFFAIRS

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TO: R. D. Bradford - Olin
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DATE: May 10, 1988

COPY: J. Matey
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SUBJECT: RCRA Task Group
Evaluation of SCAN

At Bob Jackson's request, we have been discussing a pilot test of the SCAN system by the RCRA Regulations Task Group, or one of our Work Groups, over the past several months. This will serve as an update to tell you what we've done, where we are, and what our plans are. I'll also offer a few questions of my own to consider early on.

As you know, SCAN is basically an electronic communications system, already widely used by the State Affairs folks at CMA. Our mission was to determine if EMC task groups could benefit from the use of SCAN, and, if so, what would CMA, or member companies, need to do to make it happen. Because of higher priorities, we did not seriously begin this evaluation until March.

What we've done - I've discussed the use of SCAN with UCC's State affairs folks. It's viewed as a useful tool with easy access from PC's, Wang's, or terminals, allows our State affairs representatives to stay abreast of on-going developments in many states, and alerts them to up coming CMA meetings and to CMA positions on key issues. They also use SCAN to issue broad based communications to various groups; different distribution lists (e.g., task groups, work groups, etc.) can be established on SCAN. One of the more useful aspects for SCAN, with add-on software, would be to electronically send and revise short sets of regulatory comments or letters on short notice. This might be particularly useful to the RCRA TG, and in other legislative activities as well. We've also evaluated the status of the RCRA TG members--9 of the 12 member companies on the TG subscribe to SCAN. Stephanie McQueen has reviewed the status of CMA's involvement with SCAN, and concluded that Janet Matey can access SCAN using existing equipment elsewhere in the building. However, if EMC groups were going to use SCAN in any on-going fashion, some investment in hardware (terminals, etc.) would be a necessity.

Where we are - Stephanie is currently collecting information from the TG members regarding their existing computer terminal, accessibility, word processing software, etc. After we collect that information, we'll be prepared to discuss at our next TG meeting on 5-25 the timing of a trial run (I'm assuming that there will be support by the member companies).

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For the three companies not on SCAN, Stephanie will try to get a 60-day slot of time for them to access the system on a trial basis. We think this will be acceptable.

After this, we should be prepared to actually pilot the system.

What our plans are - I hope to be able, by the end of June, to have completed a two month trial of the system. I'd hope to communicate TG meeting agendas, some 2-3 page position papers, and maybe a selected set of short regulatory comments. Ideally, rather than just testing the system as a mailbox, I'd like to test it in an interactive mode; if not with all companies, at least with 3-5 willing members. We would expect to give EMC our overall assessment by the end of August.

Some early questions for EMC to consider are as follows--

1. Do the environmental folks at member companies support this effort?--if not, it will surely fail.

2. Is CMA committed to this effort?--some level of expenditure will be necessary to get EMC staff up to date (equipment-wise), and some additional software may be required by CMA and member companies. Assuming our pilot program works OK and our TG members want to push on, I hope that we don't run into a stumbling block at CMA re: budgets.

3. Is EMC prepared to require companies to pay to use SCAN (approximately \$500/yr) or will it be an optional mode of communication? If the latter, the savings to CMA won't be as significant, and might entail the need for separate distribution lists at CMA--one for E-mail, and another for U.S. postal service.

Let me know if you have any questions--I'll keep you posted on our progress.

J. K. Petros / B

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