

AGENDA  
MEETING OF THE MCA BOARD OF DIRECTORS  
10:00 a.m., Tuesday, February 8, 1977  
Washington Hilton (Map Room), Washington, D. C.

- I. Opening Remarks and Introduction of Guests
- II. Minutes of Meeting of January 11, 1977
- III. Business Items:
  - (a) Approval of Director's Alternate:  
Charles E. Brookes (for Robert D. Goodall)
  - (b) Report of Membership Committee  
Nease Chemical Company, Inc.
  - (c) Proposed Benzene Study Relative to OSHA Regulation (Attachment)
  - (d) Appointment of Committee Members (Attachment)
- IV. Report of Director of Government Relations
- V. Reports of Committees: (Attachment)
  - (a) Chemical Regulations Advisory Committee  
George Dominguez, Chairman  
Discussion leader: Richard E. Heckert
  - (b) Government Relations Committee  
Don A. Goodall, Chairman  
Discussion leader: John M. Henske
  - (c) Labels and Precautionary Information Committee  
Charles J. (Charlie) O'Connor, Chairman  
Discussion leader: Andrew J. McNeill
- VI. Information Items by Directors
- VII. Report of the President

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Next Meeting of the Board of Directors - 9:00 a.m., Tuesday, March 8, 1977,  
Lakeway Inn, Austin, Texas

CMA 071432

REPORT TO THE BOARD OF DIRECTORS  
MANUFACTURING CHEMISTS ASSOCIATION

GEORGE DOMINGUEZ, CHAIRMAN  
CHEMICAL REGULATIONS ADVISORY COMMITTEE

FEBRUARY 8, 1977

The Chemical Regulations Advisory Committee (CRAC) is most intensely active in preparing draft proposals for the Environmental Protection Agency's (EPA) use, through its Office of Toxic Substances (OTS), in drafting regulations and definitions required on a time schedule established by the Toxic Substances Control Act. A series of weekly meetings provided EPA with abbreviated views on basic concepts. At EPA public meetings December 14 and 15, prepared statements were read before an audience of 700. Later, statements were presented on more detailed sections and issues of the law before smaller EPA sponsored meetings. In mid-January, MCA views were developed for presentation to EPA on twelve "records and reports" issues delineated by EPA. In these and the weekly meetings, the views presented were largely tentative, but increasingly convergent on workable understandings through interaction with EPA. As EPA further clarifies its strategies, this frequency of meetings is likely to increase, to complete implementation in 1977 as required by law.

The results of these sessions are manifest in changed EPA positions. For example, EPA's earlier preference for a simple numerical limit to "small quantities for research and development" has shifted to MCA's view that flexibility is needed to reflect realistic dissimilarities between diverse industries and different stages in research. The agreed control is that the manufacture or processing of such varied quantities be supervised by professionally trained personnel informed about the health and safety aspects of the specific material. Still to be resolved is the procedure for distribution or disposal of plant-scale trial quantities.

Another example of progress is EPA's dropping its proposal that impurities of substances be reported with annual production volumes. The EPA staff finally agreed that its proposal would not meet cost/benefit analysis.

Perhaps the most creative proposal tentatively accepted by EPA is the system MCA proposed to maintain confidentiality of the identity of certain substances considered to be bona fide trade secrets. Coding identities by qualitative empirical formula and molecular weight, this proposal has earned initial support by environmentalists.

Volunteer company members, in addition to CRAC's membership of thirty, have been readily accepted at work group levels, assuring effective MCA representation in these frequent EPA working sessions. The January issue of MCA News carries a story and picture of one of the work groups actively preparing positions on the development of the section 8(b) inventory list of existing chemicals.

Simultaneously, three regional seminars have been organized to help companies prepare for compliance. The first of these was held February 2 in Philadelphia, Pennsylvania and was highly successful in terms of attendance and of the number of searching questions asked. You may wish to alert your mid- and far-West associates of the next two meetings, February 23 at St. Louis, Missouri, and March 10 at San Francisco, California.