

Trust Us, Don't Track Us

An Investigation of the Chemical Industry's Responsible Care Program

January 1998

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Executive Summary

Ten years ago the Chemical Manufacturers Association (CMA) launched the Responsible Care campaign to reverse the bad public image of the chemical industry. CMA's own surveys showed that the public had little confidence in the industry's ability to produce chemicals in a safe manner. The Responsible Care program committed CMA member companies to a set of principles to improve community and occupational health and safety, and environmental protection. The CMA began taking steps to improve their image and communicate an openness on the part of the chemical industry.

In the words of former CMA President Robert Roland, "We have said it all along that we are not asking the public to trust us. We are asking everyone to track us. Monitor our performance and make suggestions that will help us improve."

In 1998, ten years since the start of Responsible Care, the Public Interest Research Groups (PIRGs) decided to take up the CMA on their challenge of "Don't trust, us track us." PIRG staff and volunteers called 187 CMA member facilities in 25 states and asked 7 basic questions. The results of the survey are disturbing.

- At 72 of the facilities--39 percent--callers could not reach anyone to answer their questions, despite repeated attempts;
- At 33 of the facilities surveyed--18 percent--the company contact either could not or would not answer any of the questions;
- At 40 of the facilities surveyed--21 percent--the company contact could answer only some of the questions; and
- At 42 of the facilities surveyed--22 percent--the contact gave an answer to each of the seven questions and seemed to understand the spirit of Responsible Care.

Equally troubling, a recent survey conducted by the International Federation of Chemical, Energy, Mine, and General Workers' Union (ICEM) indicates that Responsible Care has had no impact on the majority of the world's chemical workers. The survey found that 35% of union employees contacted were not even aware of the Responsible Care program, and most unions that were aware of the program were skeptical of its value.

Our findings are consistent with the results of the ICEM survey. The majority of chemical companies across the country have yet to adopt the principles of Responsible Care within the gates of their facilities. Despite the CMA's proclaimed openness and desire to address community

concerns, our survey shows that over 75% of the companies called did not provide answers to seven basic questions about chemicals used at their facilities. Further, the voluntary nature of Responsible Care leaves the public and workers with no reliable way to verify an individual company's compliance with the program.

The words in the chemical industry's multi-million dollar ad campaign conflict with their words on Capitol Hill and actions in the communities across the country. The CMA vigorously opposes Right to Know legislation designed to provide community members with more complete information about toxic chemicals used and produced by companies and released into the environment. Specifically, the CMA opposes legislation that would require the collection of the very data needed to "track" their chemical use. Our research indicates that the vast majority of companies are still operating under the motto of "Trust us. Don't track us."

Proposals are pending in Congress that would fill in many important Right to Know data gaps, protect industry trade secrets, and streamline data collection. Specifically, these proposals would provide the public with:

- toxics use data on chemicals used in facilities, transported through communities, and contained in consumer products;
- information on occupational exposure to toxic chemicals; and

information on some of the most toxic substances known to science, such as lead, dioxin, and mercury--toxics that persist in the environment for decades.

The Chemical Industry and the Toxics Problem

On December 3, 1984, a toxic cloud of methyl isocyanate gas leaked from a Union Carbide facility in Bhopal, India. Officials estimate the accident caused 3,000 deaths and more than 100,000 injuries.

According to the U.S. Environmental Protection Agency, between 1980 and 1990, 15 potentially catastrophic industrial accidents in the U.S. released toxic chemicals in volumes and levels of toxicity exceeding those that killed 3,000 in Bhopal.¹

From 1993 to 1995, more than 23,000 accidents involving toxic chemicals occurred in the United States. On average, 642 times per month, or 21 times a day, a chemical accident was reported--for the past eight years, nearly one toxic accident every hour.²

- In May 1994 three Shell Chemical workers were killed at a Belpre, Ohio facility when a major explosion released hundreds of

thousands of pounds of styrene and other chemicals into the air and the Ohio River.

- In December of the same year a huge explosion destroyed the seven-story Terra International ammonium nitrate fertilizer plant in Sergeant Bluff, Iowa, releasing 100 tons of nitric acid and 5700 tons of ammonia. The explosion killed 4 people, injured 36, and caused the evacuation of 2000 people.
- Three firefighters were killed during the summer of 1997 in Arkansas, when an explosion blew out a cinder-block wall, crushing the firemen who had been sent to the plant to investigate a smoking bag of unknown contents. According to the Associated Press report, "they were just going to take a look at what was happening," said Allen Bartlo, the owner of BPS, Inc. "Something blew up and we have no idea what caused the explosion."
- In late December 1997, as most of us prepared to ring in the new year, 2500 residents of Maysville, Kentucky were evacuating their homes in the middle of the night because of a chemical fire at a nearby fertilizer plant. Over 420 tons of explosive and toxic materials burned out of control.

Chemical accidents are but one symptom of our over reliance on toxic chemicals. Toxic chemicals permeate our daily lives. More than 72,000 synthetic chemicals are used and produced today, and 1,000 new chemicals are added to the market each year.

One in four Americans, including 10 million children under the age of 12, lives within four miles of a toxic waste dump.

More than 100,000 children are accidentally poisoned by pesticide use each year.

More than 30 million Americans get their drinking water from systems that violated one or more public health standards.

These chemicals are released into the air and water, used in the workplace, transported through our communities, and contained in the products we buy. Many common industrial chemicals can cause cancer and birth defects, as well as significant environmental damage such as ozone depletion and pollution of drinking water.

Lead poisoning, resulting in decreased intelligence and attention span, has effected 1.7 million children under the age of 5.

Source: Environmental Health Threats to Children, U.S. EPA, September 1996.

Today, news coverage on chemical accidents and toxic pollution has become routine. However, in the early 1980's, as reports of toxic tragedies began to surface, their startling nature triggered a heightened public awareness about the threat of toxic chemicals and the safety of the chemical industry.

The 1986 Community Right to Know Law

In the midst of toxic tragedies such as the 1984 Bhopal accident, the public demanded the right to know what chemical industries were using and releasing into their neighborhoods, schools and workplaces.

Citizens across the country urged their state legislators to vote for legislation that would require industries to publicly report on their use of toxic chemicals. By 1985, twenty- one states had enacted Right to Know laws requiring companies to publicly report on various aspects of toxic chemical use. And in 1986 the U.S. Congress passed federal legislation, the Emergency Planning and Community Right to Know Act, Title III of Superfund.

The Community Right to Know Act was enacted with two goals: first, to improve emergency planning, and second, to require disclosure to the public of those chemicals that are released into the environment. The law required large manufacturing facilities to report annually on their emissions of 300 toxic chemicals to the air, land, and water. The Right to Know Act also established the Toxics Release Inventory (TRI), where the EPA compiles this toxic chemical release information and makes it available to the public.

The Chemical Manufacturers Association opposed this legislation and instead moved to develop an entirely voluntary code of industry regulations. Realizing their dismal environmental and safety record had caused the public to lose confidence in the industry, the CMA responded by developing the Responsible Care Initiative.

The Responsible Care Initiative

John Johnstone, Olin Corporation Executive and former chairman of the CMA, said about the chemical industry's public image, "we are going to end up in worse shape than the atomic industry if we don't do something."³ CMA's own surveys indicated that the public had little confidence in the chemical industry and favored additional regulation combined with strict enforcement of environmental laws.

According to Chemical Week, a publication that follows the chemical industry, the CMA "began to look at ways to address and reverse the bad public image of the chemical industry and the adverse impact it was making on business."⁴ In 1988, out of this effort, the CMA launched the "Responsible Care" campaign.

At the heart of Responsible Care are certain guiding principles [see appendix]. These principles commit CMA member companies to:

- Be safe and environmentally responsible in the manufacture, transportation, storage, use and disposal of chemicals
- Respond to community concerns about chemicals and operations.
- Help communities put emergency procedures in place to handle spills and other releases--procedures that also can be useful in responding to natural disasters
- Keep the public and government officials informed about chemical-related health and environmental hazards.

A typical Responsible Care advertisement states:

You're driving by that chemical plant, just like you do every day, when one of your kids asks you what they make there and you answer that you're not really sure and it occurs to you that you probably should be...

*The Chemical Manufacturers Association
We want you to know.*

In the words of former CMA President Robert Roland, "We have said it all along that we are not asking the public to trust us. We are asking everyone to track us, monitor our performance and make suggestions that will help us improve."

Chemical Week, July 1991

Another reads:

You're passing a tank truck with one of those hazard signs on the back and it occurs to you that you have no idea how hazardous it really is, which gets you wondering whether the guy hauling it does either...

*The Chemical Manufacturers Association
We want you to know.*

Is Responsible Care Working?

In the ten years since Responsible Care has been in place, we have seen numerous CMA publications touting the effectiveness of the program. The CMA's yearly Responsible Care Progress Report claims great achievements⁵, yet it seems the principles of Responsible Care have not been adopted by many of the CMA member companies across the country. Furthermore, the weaknesses of Responsible Care bring into question the inherent value of the program.

The voluntary nature of the Responsible Care program translates to member companies doing little more than complying with current environmental laws--laws that fall short of what is needed to prevent toxic pollution. Responsible Care does not provide the public or workers with any reliable way to verify an individual company's compliance with the program. Nor does it require that the company set measurable public goals to allow the public to gauge success.

A recent survey conducted by the International Federation of Chemical, Energy, Mine and General Workers' Union (ICEM) indicates that the Responsible Care program has had no impact on the majority of the world's chemical workers. The survey found that 35% of union employees contacted were not even aware of the Responsible Care program, and most unions that were aware of the program were skeptical of its value.⁶

A Tellus Institute case study on Witco Corporation of New Jersey indicates a similar feeling among the corporation's management. According to the plant manager, the Responsible Care program does very little to help achieve pollution prevention because of the lack of structured process inherent in the program. The facility manager pointed to the failure of Responsible Care to provide any assistance or direction in reaching pollution prevention goals.⁷

Finally, Responsible Care has failed to make real progress toward responsiveness to community concerns. The CMA has formed Community Advisory Panels (CAPs) in various communities across the country. Residents living in communities nearby certain facilities meet regularly, with the intention of improving dialogue between each company and the community residents. Though increased dialogue between community members and CMA facilities would be a step toward better public access to information and industry accountability, the Responsible Care CAPs are limited by design. CAPs have a membership that is hand-picked by the companies, are accountable to no one but those companies, and can be shut down at any time. CAPs have no decision-making authority, and cannot hold CMA companies to measurable standards. CAPs use company-paid facilitators, and lack the resources to bring in outside advisors, or to technically analyze information provided by the companies.

The chemical industry's failure to truly implement the principles of Responsible Care, and the weaknesses inherent in the program itself, leave the public and industry workers out of the loop. A key to improving community and worker involvement is increasing the public's ability to track how toxic chemicals are being used and released, and measure pollution prevention.

Right To Know Is Drastically Incomplete

The existing Right to Know law does not allow public and policy makers, or even industry itself, to track or promote pollution prevention. Although the 1986 Community Right to Know Act provides us with the best information on toxic releases, it is drastically incomplete. Of the 72,000 synthetic chemicals on the market, just over 600 are required by law to be reported on--this represents less than 1 percent of the chemicals in use. Furthermore, some of the worst polluting industries like incinerators and dry cleaners are exempt from reporting, and some of the most acutely toxic substances like dioxins, lead, and mercury escape reporting due to loopholes in the law.

One of the largest information gaps in the Community Right to Know Act is the absence of chemical use data, or "materials accounting" data. Currently many--but not all-- industries are required to report on toxic chemical releases. However, the Right to Know law does not provide the public with information on how toxic chemicals are used in the workplace, transported through the community, and contained in the products we buy. In 1989, the U.S. Office of Technology Assessment estimated that 95 percent of toxic pollution goes unreported to the public.⁸ Although we have made some progress recently, the public is still missing critical information.

CMA Works to Keep the Public in the Dark

Given both the gaps in the current publicly available information, and the spirit of Responsible Care, we would expect the chemical industry to work toward improving the Right to Know law to help the public better understand and defend against toxic pollution. Unfortunately, Responsible Care advertisements often conflict with industry's words on Capitol Hill and actions in communities across the country. Although the CMA claims Responsible Care is more than just an advertising campaign, it appears that most of its members are not providing information that is not already required by the law. Furthermore, the CMA's proclaimed willingness to be open with the public directly conflicts with their efforts to weaken the existing Right to Know program and block any attempts at expansion.

The CMA has fought Right to Know expansion every step of the way in Congress and through the EPA. Since 1989, 230 Political Action Committees (PACs) representing industries that have fought to weaken Right to Know legislation contributed over \$68 million to U.S. Congressional candidates. Almost one half of this money, \$31 million, came from 84 Chemical Manufacturers Association member company PACs. Senators who voted against Right to Know in the 104th Congress,

received almost 3 times more money from CMA PACs than those that voted for it.⁹

Between 1994 and 1998 the chemical industry has lobbied Congress to:

- delist 90% of TRI chemicals during "Regulatory Reform" debates of the 104th Congress;
- cut the EPA's 1996 and 1997 budget, including a proposal to cut \$1.5 million from funds designated to expand the Toxics Release Inventory;
- block EPA's authority to collect chemical use data; and
- prevent EPA from prosecuting polluters who have hidden environmental violations in secret self-audits authorized by state law

The CMA has tried to directly block EPA efforts to improve Right to Know by :

- filing a lawsuit against the EPA in the U.S. District Court to oppose the inclusion of 152 chemicals in the November, 1994 proposed rule to add 286 chemicals to the Toxics Release Inventory;
- sending numerous letters and comments to EPA Administrator Carol Browner opposing EPA's proposals to expand the public's right to know to include information on toxic chemical use;
- seeking to reclassify underground injection of wastes to reduce releases on paper; and
- working to exempt from TRI reporting up to 5,000 pounds of releases for each chemical.

Public Support for Right To Know Has Prevailed

Despite the attempts by the Chemical Manufacturers Association and its member companies to keep the public in the dark, public support and a strong commitment from the Clinton Administration have led to some steps in the right direction in recent years. Overwhelming public support for an expanded Right to Know program is even documented by the CMA. In a poll of 800 people, the CMA found that most people surveyed support public access to information about toxic chemicals.¹⁰

EPA and Congress have taken steps in the right direction in the last few years:

- The 104th Congress added a Right to Know provision to the Safe Drinking Water Act, requiring utility systems to send information with their water bill about pollutants in the drinking water.
- In 1994 the U.S. EPA doubled the list of chemicals on which industries are required to report from 300 to 600.
- On Earth Day 1997, President Clinton announced the addition of seven new industries to the Right to Know Act, including the mining industry, utilities, and hazardous waste treatment facilities.
- The U.S. EPA issued an Advanced Notice of Proposed Rulemaking to add toxics use information to the Right to Know Act and accepted public comments through the end of February 1997.

The Public Supports Expanded Right to Know	
About pollution	93%
About chemicals used in community	91%
About chemicals in products	90%
Source: U.S. Poll of 800 people by CMA	

Representatives Waxman (D-CA), Saxton (R-NJ) Pallone (D-NJ), and Markey (D-MA) have introduced HR 1636, the Children's Environmental Health and Right to Know Act, which currently has 127 cosponsors. Senator Lautenberg (D-NJ) has introduced S.769, a similar bill in the Senate. Both bills would expand the Community Right to Know Act to fill in some of the serious gaps in the existing program.

Materials Accounting Data: Successful State Programs

Several states have gone beyond federal Right to Know legislation, and passed forward reaching state laws. In 1986 a New Jersey state law was enacted requiring companies to publicly report on how toxic chemicals are used within manufacturing facilities, sometimes referred to as "materials accounting" or "use data". In 1989 Massachusetts enacted its own Toxics Use Reduction Law with expanded right to know reporting. The results of these state laws are remarkable:

- The New Jersey Department of Environmental Protection's December 30, 1996 study, Industrial Pollution Prevention Trends in New Jersey, found that between 1987 and 1994 hazardous wastes decreased as a result of pollution prevention by approximately 50 %.

- The Massachusetts Department of Environmental Protection's analysis found that, from 1990 to 1995, toxic chemical use has been reduced by 20 percent and hazardous waste generation decreased by 30 percent.

By collecting and reporting how chemicals are used within each facility, companies find more efficient ways to do business. They streamline processes and minimize excess chemical use, creating less waste, and saving money. Massachusetts industries saved \$14 million between 1990 and 1997, according to the Massachusetts Department of Environmental Protection.

Toxic use data helps the public understand the hazards associated with toxic chemicals used in the workplace, contained in consumer products, associated with the chemical accidents, and stored in communities. State toxics use reporting laws are tried and true methods of encouraging companies voluntarily prevent toxic pollution. The federal Right to Know program collects information on toxic chemical releases, continuing to focus industry's attention to end-of-pipe solutions.

CMA has opposed the addition of toxics use data to the federal Right to Know law. CMA's efforts to prevent disclosure of materials accounting information have ranged from lobbying Congress to block the EPA's authority, to publishing a report discrediting New Jersey and Massachusetts successful toxics use laws.¹¹

Methodology: The "Trust Us. Don't Track Us." Survey

Confronted with these seemingly contradictory stories--"Responsible Care" claims on one hand and continued efforts to prevent expansion of the Right to Know program on the other hand--the PIRGs decided to take the CMA up on their challenge of "Don't Trust us. Track us." We surveyed CMA facilities for the first time in 1992, and were disturbed at the difficulty we had obtaining answers to basic questions from local companies. Six years later, we used the same approach to survey large chemical facilities again, to see if it was any easier to track their chemical use.

Using the Toxics Release Inventory (TRI), the federal on-line database established by the Community Right to Know Act in 1986, we chose the ten CMA facilities that reported the largest toxic releases in each of 25 states in 1995 (the most recent data available).¹²

State PIRG and local National Environmental Trust (NET) volunteers and staff called each facility to see if they would answer seven simple

questions about toxic chemical use, transportation and accident prevention. Calls were made by citizen outreach staff and volunteers living in the state, and in many places the same community, where each facility is located. In some states, callers were student volunteers from PIRG campus chapters. Callers asked for the specific person designated by the company as its contact person under the federal Right to Know law, and asked the person to answer a few questions, as follows:

1. Can you tell me the names and quantities of chemicals that potentially cause cancer or birth defects that you brought into and shipped out of the facility last year?
2. Can you tell me what chemicals that may cause cancer or birth defects workers are exposed to at the facility?
- 3a. Do you make products at the facility that contain chemicals that are toxic or could cause cancer or birth defects?
- 3b. (If yes) Can you tell me the names and amounts of toxic chemicals that go into the products you make at your facility?
4. Have you had any accidents involving the transportation of toxic or hazardous chemicals to or from your facility in the past five years?
5. Have you made available to the public your internal emergency management plans, including worst case scenarios for accidental chemical releases?
- 6a. Does your facility conduct toxics use reduction or source reduction planning?
- 6b. (If yes) Have you made available to the public your facility's toxics use reduction or source reduction plans or goals?
7. Does your facility routinely collect data on how toxic materials move through the facility, sometimes referred to as "materials accounting"?

Callers made at least three attempts to call each facility, leaving messages wherever possible. When no contact person was listed in the TRI database, callers explained why they were calling, and asked to speak with someone who would be able to answer those questions for them. Under no

circumstances did callers simply ask the questions of the person who happened to answer the phone.

The intent of the survey was to test how easily an average community member could access simple information about a nearby facility. Test calling showed that identifying oneself with PIRG led to mixed results, in most cases facility contacts were less forthright, and sometimes hostile. For this reason, staff, citizen, and student volunteers did not identify themselves with PIRG or NET.

In tabulating our results, we did not grade answers based on accuracy of the data provided. Our goal was merely to find out if we could get an answer to each question. If a company provided us with any information, we gave them the benefit of the doubt as to its accuracy, and counted their answer in our results.

We also scored each answer generously with respect to its completeness. If a facility representative could answer part, but not all of a question, we scored the question as having been answered. For example, the first question on the survey was: "Can you tell me the names and quantities of chemicals that potentially cause cancer or birth defects that you brought into or shipped out of your facility last year?" If the facility contact person could give the caller any answer to that question, such as the names of a few chemicals, we scored that as a complete answer, even if the contact person could not provide the information on the amounts of those chemicals.

Results

The results of our survey are disturbing. Our findings indicate that the majority of companies participating in the "Responsible Care" program either continue to distrust the public, or are ill-prepared to answer basic questions about toxic chemical use and accident prevention at their facility.

We surveyed 187 facilities in 25 states and asked 7 questions of each facility:

- At 72 of the facilities--39 percent--callers could not reach anyone to answer their questions, despite repeated attempts;
- At 33 of the facilities surveyed---18 percent--the company contact either could not or would not answer any of the questions;
- At 40 of the facilities surveyed---21 percent--the company contact could answer only some of the questions; and

- At 42 of the facilities surveyed--22 percent--the contact gave an answer to each question and seemed to understand the spirit of Responsible Care.

Responses from the companies to the PIRG callers ranged from hostile to friendly.

One caller in Pennsylvania was put on hold for 10 minutes, then disconnected. When he called back, he was put on hold for another 5 minutes, and was finally transferred to the shipping department, where the person who answered the phone was unwilling and unable to answer any of the questions.

A contact person at one Delaware facility was so suspicious of our inquiries that he not only refused to answer our questions, but also tracked down the caller at work and threatened to discredit him in Washington, D.C.

When a PIRG caller asked the first question to a contact person at a Georgia facility, the contact person laughed and said, "You're kidding, right?" He was unable to answer any of the questions asked.

Other facilities, such as Hampshire Chemical Corporation in New Hampshire and Tippecanoe Laboratories in Indiana, were helpful and friendly and even sent additional materials in the mail to make sure all questions were answered completely.

Conclusions and Recommendations

The PIRG survey indicates that Responsible Care continues to be little more than a public relations exercise. Although the Chemical Manufacturers Association has spent millions of dollars to make sure that Responsible Care makes its way onto the pages of magazines like People and Newsweek, most companies have yet to adopt the spirit of the program inside the gates of their facilities.

Six years after we conducted our first survey, it is clear that the chemical industry is still not providing the public with basic information. Responsible Care is ineffective for two reasons:

First, the vast majority of chemical companies fail to implement the Responsible Care principles. Despite Responsible Care's proclaimed commitment to address community concerns, our survey shows that most companies could not or would not answer basic questions about chemicals used at their facilities. Another Responsible Care Guiding Principle commits CMA member companies to protecting the safety of their

employees, yet according to the ICEM survey, many facility employees unaware of the existence of the program.

Second, Responsible Care is unenforceable. The voluntary nature of the program, and the inherent lack of structured process, provide no reliable way for workers or the public to verify compliance with the program. This leaves CMA member companies doing little more than complying with the current law--a law that falls drastically short of what is needed to prevent toxic pollution.

The weaknesses inherent in the Responsible Care program translate to "we'll be responsible for what we care to tell you." Although CMA ads continue to read, "We want you to know", their actions on Capitol Hill and actions in the communities across the country paint a different picture. The CMA continues to vigorously oppose Right to Know legislation designed to provide community members with more complete information about toxic chemicals used and produced by companies, and released into the environment. They continue to oppose legislation that would require the collection of "materials accounting" data--the exact information the public needs to track toxic chemical used in facilities, transported through the communities, and contained in products.

Although EPA and Congress have taken steps in the right direction, we have a long way to go to ensure full public access to information, understand some of the greatest chemical hazards, and promote pollution prevention.

Proposals are pending in Congress that would fill in many important Right to Know data gaps, protect industry trade secrets, and streamline data collection. Specifically, these proposals would provide the public with:

- toxics use data on chemicals used in facilities, transported through communities, and contained in consumer products;
- information on occupational exposure to toxic chemicals; and
- information on some of the most toxic substances known to science, such as lead dioxin in mercury--toxics that persist in the environment for decades.

Footnotes

¹Ecology Law Quarterly, Chemical Accident Prevention Regulation in California and New Jersey, vol 20:755- 813, J. Potter, 1993.

²Accidents Do Happen. Toxic Chemical Accident Patterns in the United States, National Environmental Law Center, U.S. Public Interest Research Group, December 1996 (information compiled from the Emergency Response Notification System database)

³New York Times, Chemical Makers Identify a New Hazard: Their Image, John Holusha, August 12, 1991.

⁴Chemical Week, July 1991.

⁵The Year in Review 1995-1996, Responsible Care Progress Report

⁶ Responsible Care, A Credible Industry Response?, 1997 survey of International Federation of Chemical, Energy, Mine and General Workers' Union (ICEM)

⁷ New Jersey's Planning Process: Shaping a New Vision of Pollution Prevention, Case Study Number 4, Witco Corporation, Tellus Institute

⁸ Statement of the Office of Technology Assessment before the Subcommittee on Superfund, Ocean and Water Protection, Committee on Environment and Public Works, United States Senate, May 10, 1989

⁹ Costly Chemical Cover-up: Anti-Right to Know PAC Contributions, U.S. Public Interest Research Group, November 1996 (based on Federal Election Commission Data)

¹⁰ Chemical Week, October 2, 1996

¹¹ New Jersey and Massachusetts: Toxic Use Reduction Successes? Models for National Programs?, Chemical Manufacturers Association, 1997

¹² Some states had fewer than ten CMA facilities reporting under TRI, and some facilities had closed or moved since 1995

Appendix: Survey Results

KEY:

- 1** *Answered all the questions*
- 2** *Couldn't or wouldn't answer the questions*
- 3** *No Contact*
- 3*** *Made one attempt to return our call. No contact was made, despite additional calls we made*
- 1/2** *Answered some questions*
- A** *Answer*
- NA** *No answer*

See [Methodology](#) for specific questions.

COMPANY	CITY	CODE	#1	#2	#3A	#3B	#4	#5	#6A	#6B	#7
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Condea Vista Co	Baltimore	3	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cytec Industries	Havre DeGrace	1/2	A	A	A	A	NA	NA	A	A	A	
FMC Corp	Baltimore	3	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Grace Davison	Baltimore	3	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Reichold Chemicals Inc.	Baltimore	3*	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SCM Chemicals, Hawkins Point Plant	Baltimore	1	A	A	A	A	A	A	A	A	A	A
Sun Chemical Corp. GPI Div.	Williamsport	1/2	NA	NA	A	A	NA	A	A	A	A	A
Velsicol Chemical Corp.	Chestertown	3	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAINE												
FMC Corp, Food Ingredients Division	Rockland	1/2	NA	A	A	A	A	A	A	A	A	A
Georgia-Pacific Chip and Saw Complex	Woodland	1	A	A	A	A	A	A	A	A	A	A
Georgia-Pacific Corp.	Woodland	1	A	A	A	A	A	A	A	A	A	A
National Starch and Chemical Co.	Island Falls	2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MICHIGAN												
BASF Corp., Bourke Ave.	Detroit	3	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dow Chemical	Midland	1/2	NA	NA	NA	NA	NA	NA	NA	A	A	NA
Dow Corning Corp	Midland	3	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DuPont Montague Works	Montague	2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Georgia-Pacific Corp.	Kalamazoo	1	A	A	A	A	A	A	A	A	A	A
Huntsman Polypropylene Corp.	Marysville	1/2	NA	NA	NA	NA	NA	A	A	A	A	A
Weyerhaeuser Co.	Grayling	3	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MISSOURI												

3M, Nevada Plant	Nevada	1/2	NA	NA	NA	NA	A	A	A	A	NA
3M, Springfield	Springfield	1	A	A	A	A	A	A	A	A	A
American Cyanamid Co., Hannibal Plant	Palmyra	1/2	A	A	A	NA	A	A	A	A	A
Mallingckrodt Chemical Inc.	St. Louis	2	NA	NA	NA	NA	NA	NA	NA	NA	NA
Missouri Chemical Works	Louisiana	1	A	A	A	A	A	A	A	A	A
Syntex Agribusiness Inc.	Springfield	1	A	A	A	A	A	A	A	A	A
<i>NORTH CAROLINA</i>											
DuPont, Cape Fear	Leland	3*	NA	NA	NA	NA	NA	NA	NA	NA	NA
DuPont, Kingston Plant	Kinston	1	A	A	A	A	A	A	A	A	A
Occidental Chemical Corp.	Castle Hayne	1	A	A	A	A	A	A	A	A	A
Weyerhaeuser Co. Plymouth Mill	Plymouth	3	NA	NA	NA	NA	NA	NA	NA	NA	NA
Weyerhaeuser Paper Co.	Vanceboro	1/2	A	A	A	A	NA	A	A	A	NA
<i>NEW HAMPSHIRE</i>											
Hampshire Chemical Corp.	Nashua	1	A	A	A	A	A	A	A	A	A
Jones Chemicals	Merrimack	1	A	A	A	A	A	A	A	A	A
Morton International Inc. Sea	Seabrook	2	NA	NA	NA	NA	NA	NA	NA	NA	NA
<i>NEW JERSEY</i>											
Degussa Corp. Metal Group	South Plainfie	3	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dupont Chambers Works	Deepwater	3	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dupont Repauno Plant	Gibbstown	3	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hercules, Inc	Gibbstown	3	NA	NA	NA	NA	NA	NA	NA	NA	NA
Mallickrodt Baker, Inc.	Philipsburg	3	NA	NA	NA	NA	NA	NA	NA	NA	NA
Merck & Co.	Raway	1/2	NA	A	NA	NA	A	A	A	A	A

