



# *Community Advisory Panel*

MONDAY, OCTOBER 15, 2007

## MINUTES

The Dow Community Advisory Panel met on Monday, October 15, 2007 at 6:00 p.m. at the Dow Conference Center. The following persons attended the meeting:

### CAP Members

Ms. Scarlet Callicoatte  
Ms. Shelley Delapasse  
Mr. Ernest Grant  
Mr. Mickey Rivet  
Mr. Raymond Smith, Jr.  
Mr. Daniel Stoute  
Mr. Gerald Trent  
Mr. Jeff Wille

### Dow Personnel

Ms. Sharon Cole  
Ms. Gretchen LeBlanc  
Mr. Joe Hanna  
Mr. Bob Brady  
Mr. Charles Brumfield  
Mr. Will Nipper  
Ms. Stacey Chiasson  
Ms. Kristen Watkins  
Ms. Fran Comeaux

### Facilitation Team

Tim Johnson, Facilitator  
Nancy Campanella, Recorder

Panel members, Ms. Carolyn Brown, Ms. Emma Davis, Mr. Huey Gray, Ms. Juanita Hill, and Mr. Gerald Wilson, were unable to attend the meeting. After the facilitator welcomed those present, the CAP members approved the September 17, 2007 minutes, with one correction noted. Ms. LeBlanc, the new Responsible Care Leader, was then introduced to the panel, after the facilitator read a farewell note from the former Responsible Care Leader, Dennis Davis.

### **Annual Reporting – Where do the TRI and Other Annual Reports Come From?**

Mr. Charles Brumfield presented information on Dow's annual reporting procedures stating that Dow implemented a new database for emissions reporting over the past 3 years. For reporting year, 2006, LAO's chemical emissions were 1840 tons, a drop from 3044 tons in 1994. In 2002, emissions were less than in 2006 because some units were down, and emissions were higher in 2004 because of issues arising from sampling required for regulatory implementation. VOC emissions, which will cook into the ozone on warm stagnant days, were 1309 tons in 2006, a drop from 2593 tons in 1994.

Mr. Brumfield explained that there are over 650 point sources (furnace stacks, tank vents, scrubber vents). Each point source has specific emissions that bring the total number of reported chemical records for the site to over 3000. Dow has over 20 Title V permits for Louisiana Operations. The Title V permits establish emissions limits which are based on engineering estimates and/or sample analysis from previous years and upon process variables. Actual monitoring results are determined by use of continuous monitors and lab samples. Estimates are generally more conservative than actual numbers. After the calculations are reviewed, and changes to the permit and sources are determined, a

management of change procedure is initiated, if necessary. Dow then gathers operations data from the facility (furnace firing rates, tank throughputs, operating times, and monitoring results). The data is compared to the previous year's data to determine if there is a significant (15%+) difference between the two. If the data is determined to be correct, Dow determines the change and a change comment is recorded to note the reason for the difference. At this point, the data is uploaded into the site reporting database and each plant verifies that the data is ready. The database calculates the emissions for each chemical for each source and these emissions are compared to the previous year. Production unit emissions are then signed by the site production leaders and EHS leaders.

The following reports are required by the federal and/or state governments:

1. SARA 312. The site's chemical inventory data must be reported to the EPA, DEQ, State Police, and LEPC by March 1 each year.
2. EIS (Emissions Inventory System). The site's criteria pollutants (nitrogen/sulfur oxide, VOCs, PM10, CO) must be reported to DEQ by July 1 of each year.
3. TEDI (Toxic Emission Inventory). Louisiana air toxics data must be reported to DEQ by July 1 of each year. This is a set list of toxins modeled after federal guidelines plus some additions that are more stringent than the federal guidelines.
4. SARA 313 (TRI). The site's multimedia releases and waste must be reported to EPA and DEQ by July 1 annually.

Additionally, Dow Chemical requires that each site provide the GEI (Global Emission Inventory) report of multimedia releases and waste to the GEI database in Midland, MI by March 3 each year. This information is used to track Dow's progress toward the 2015 goals.

The same chemicals are not always reported to all groups. Louisiana had toxic rules and ambient air standards in place before the feds did. There are very few states that have an ambient air standard for toxins.

Mr. Brumfield then explained that the Superfund Amendments Reauthorization Act (SARA) has 4 components:

1. Emergency planning.
2. Emergency release notification.
3. Hazardous chemical inventory.
4. Toxic chemical release inventory.

The SARA 312 inventory report, which is required for chemicals that have an MSDS, is the amount present at any given time in the plant and is provided to the Louisiana State Police. The SARA 313, toxic release inventory, requires LAO to report all emissions of all listed chemicals (less than 150 different chemicals were reported in 2006) annually to the EPA. The process is a year-long, complex process.

Answers to Questions and Comments Included the Following:

1. Chemicals are determined by government agencies to be toxic if they are known or suspected carcinogens. Certain exposures to these chemicals can cause health problems if persons are exposed to them in amounts exceeding the limits the agencies impose.
2. Dow chooses to report any SARA or toxic emissions – no matter the level – even if below the reporting level.
3. Dow's goal is to continuously reduce emissions. Dow must be permitted for any amount used to operate normally.

4. A majority of the emissions report is set on average/maximum rates. Industry can exceed the average on occasion but not the maximum. The annual data should be based on average emissions for the entire year. If there is a significant deviation without justification, the site will be challenged.
5. State and TRI reports are available at [www.epa.gov](http://www.epa.gov)
6. All waste generated at the site is reported, including any waste sent to a landfill or a kiln.
7. LAO's emissions are down 70% since 1987. Production in many cases is up, while emissions are down.
8. Profits and operations are second to safety and environmental performance at LAO. Units have been shut down until modifications are made to address issues.

Responses to the question, "Is the perception of the environment the same as it was 5, 10, or 15 years ago?" included the following:

1. Most plants in the area want to be safe, are involved in community awareness, and want to keep their employees safe.
2. Industry is facing new issues with global warming.
3. Ms. Chiasson stated that the community surveys indicate that the environment is not as much of a concern as youth, drugs, crime, and transportation issues.
4. Education about the chemical industry is more readily available.
5. Employees are more educated about the environment.
6. Dow is committed to reporting.

### **Responsible Care Measures**

Mr. Hanna provided Responsible Care Measures information for the reporting period, September 17-October 15, 2007, stating that Dow measures all chemical spills to the surface that are over 100 pounds. There have been 8 OSHA reportables year-to-date at LAO. During the reporting period there was 1 reportable injury at the Poly A plant when a worker's hand was injured while he attempted to free a buffer from a lodged position. He was wearing gloves, but was pinched through the gloves. The injury required 4 stitches, but he is okay. The injured person is an experienced craftsman, but was new in that particular role. A root cause investigation was done. This injury broke a 4-year safety record in that facility.

There were no outside complaints, spills affecting the community, agency audits, public notices, or serious transportation incidents between September 17 and October 15, 2007. Dow's emergency response team did support a non-Dow transportation event during that period.

Year-to-date 2007, there have been 10 environmental incidents at the site. There was an incident during the reporting period, September 17-October 15, 2007, at the Vinyl II unit, when there was a release of 1.70 pounds of vinyl chloride (1 pound is the reportable quantity) and EDC caused by a piping failure which was isolated, shut down, and replaced. Dow improved its safety record from 2006 to 2007 with less reactive chemicals events and spills.

### **Dow in the News / Upcoming Events**

Ms. Chiasson provided "Dow in the News" information, including the following:

1. Gil Walker was on featured on a Dow human element commercial on Sportsline Friday Night last week.
2. Dow made a \$1.18 million donation to help repair the engineering building at LSU and to fund a minority professorship.

3. Enterprise Boulevard has been designated as a new evacuation route.
4. Twenty Port Allen High School students assisted in the recent Habitat Build.
5. TRANSCAER is a training class for first responders. Around 40 persons have signed up for the training.
6. Toys from the Dow/MCA toy drive will be provided to children in Assumption, West Baton Rouge, and Iberville Parishes.

### **Current Panel Items**

A concert series is scheduled for this weekend at the Plaquemine Locks. Country, classic rock, zydeco, and pop music will be featured.

A community focus meeting will be held at the Chamber on Thursday at 3:00 p.m. to discuss ways to help with the recent problems at E. J. Gay Middle School.

### **Around the Table**

The facilitator stated that next month's meeting would be the final meeting for 8 current panel members. He thanked those that have served and taken the position seriously. Regular attendance is a critical part of the role of the CAP members.

### **Next Meeting**

The next Dow CAP meeting will be held on Monday, November 26, 2007 at 6:00 p.m. at the Dow Conference Center. The agenda will include a presentation on global climate changes.