



NPRA

JAMES COOPER
Vice President, Petrochemicals

National Petrochemical & Refiners Association

1899 L Street, NW
Suite 1000
Washington, DC
20036-3896

202.457.0480 voice
202.457.0486 fax
www.npra.org

Montebello Agreement Update

April 16, 2008

EPA has announced an initiative, the Chemical Assessment & Management Program (ChAMP), which will help fulfill the US chemicals management obligations under the Montebello Agreement. While there are still few details on a framework, EPA has already started conducting hazard and risk characterizations on HPV chemicals that were part of the HPV Challenge.

The thought-starter for a framework has been updated to reflect the new program name and incorporate all relevant comments from the entire ANSI-NAM Network listserv participants. There were several comments outside the scope of what EPA intends under ChAMP, and were not included because they would have been out of context with the rest of the document language. The working draft has been distributed to members of the Council of Chemical Association Executives (CCAIE) for their comments, with a deadline of Friday, April 18. The CCAIE is an informal group of major trade associations related to the chemical industry. After I incorporate comments received from CCAIE, I will send the document to Charlie Auer, Jim Gulliford and Steve Johnson at EPA. The Administrator has been included because he was the one who announced ChAMP at GlobalChem in March.

One decision that must be made by the ANSI-NAM Network: What name(s) should appear as the submitter of the document? I don't think OPPT is very familiar with the ANSI-NAM Network. In fact, the proposal may have much more impact if submitted under names representing the vast diversity of this Network. It is important for EPA to understand the breadth of the economy that this Network represents.

Proposal

With your permission, I would like to include as many trade associations, technical and standards organizations, and companies as possible. Instead of trying to collect hundreds of explicit approvals, would it be reasonable to say that if an organization or company does not want its name attached, to let Kathleen know by email as soon as possible? This can be brought up during the monthly conference call on April 17, as well as in an email blast to the listserv.