

April 6, 1990
Amended September 6, 1991



Responsible Care:® A Public Commitment

POLLUTION PREVENTION CODE OF MANAGEMENT PRACTICES

Purpose.

This Code is designed to achieve ongoing reductions in the amount of all contaminants and pollutants released to the air, water, and land from member company facilities. These reductions are intended to respond to public concerns with the existence of such releases, and to further increase the margin of safety for public health and the environment.

The Code is also designed to achieve ongoing reductions in the amount of wastes generated at facilities. These reductions are intended to help relieve the burden on industry and society of managing such wastes in future years.

In implementing the Code, each company should strive for annual reductions, recognizing that production rates, new operations, and other factors may result in increases. Despite these fluctuations, however, the goal is to establish a long-term, substantial downward trend in the amount of wastes generated and contaminants and pollutants released. Quantitative reduction goals will be established for giving priority to those pollutants, contaminants and wastes of highest health and environmental concern.

This code also includes practices that address the broader waste management issues beyond source reduction and other waste and release reduction efforts. Each member company must manage remaining wastes and releases in a manner that protects the environment and the health and safety of employees and the public.

This Code complements, and should be implemented in conjunction with current and future Codes of Management Practices. Key terms are defined in the Glossary, which should be consulted for assistance in interpreting the provisions of this Code.

Relationship to Guiding Principles

Implementation of this Code helps achieve the following Guiding Principles:

- o To recognize and respond to community concerns about chemicals and our operations;
 - o To develop and produce chemicals that can be manufactured, transported, used and disposed of safely.
-
- o To make health, safety, and environmental considerations a priority in our planning for all existing and new products and processes;
 - o To report promptly to officials, employees, customers and the public, information on chemical-related health or environmental hazards and to recommend protective measures.
 - o To operate our plants and facilities in a manner that protects the environment and the health and safety of our employees and the public;
 - o To extend knowledge by conducting or supporting research on the health, safety, and environmental effects of our products, processes, and waste materials.
 - o To promote the principles and practices of Responsible Care by sharing experiences and offering assistance to others who produce, handle, use, transport, or dispose of chemicals.
 - o To work with others to resolve problems created by past handling and disposal of hazardous substances.
 - o To participate with government and others in creating responsible laws, regulations and standards to safeguard the community, workplace and environment.
 - o To promote the principles and practices of Responsible Care by sharing experiences and offering assistance to others who produce, handle, use, transport or dispose of chemicals.

Management Practices.

Each member company shall have a pollution prevention program which shall include:

1. A clear commitment by senior management through policy, communications, and resources, to ongoing reductions at each of the company's facilities, in releases to the air, water, and land and in the generation of wastes.
2. A quantitative inventory at each facility of wastes generated and releases to the air, water, and land, ~~measured or estimated at the point of generation or release.~~

3. Evaluation, sufficient to assist in establishing reduction priorities, of the potential impact of releases on the environment and the health and safety of employees and the public.
4. Education of, and dialogue with, employees and members of the public about the inventory, impact evaluation, and risks to the community.
5. Establishment of priorities, goals and plans for waste and release reduction, taking into account both community concerns and the potential health, safety, and environmental impacts as determined under Practices 3 and 4.
6. Ongoing reduction of wastes and releases, giving preference first to source reduction, second to recycle/reuse, and third to treatment. These techniques may be used separately or in combination with one another.
7. Measurement of progress at each facility in reducing the generation of wastes and in reducing releases to the air, water, and land, by updating the quantitative inventory at least annually.
8. Ongoing dialogue with employees and members of the public regarding waste and release information, progress in achieving reductions, and future plans. This dialogue should be at a personal, face-to-face level, where possible, and should emphasize listening to others and discussing their concerns and ideas.
9. Inclusion of waste and release prevention objectives in research and in design of new or modified facilities, processes, and products.

10. An ongoing program for promotion and support of waste and release reduction by others, which may, for example, include:
 - a. Sharing of technical information and experience with customers and suppliers;
 - b. Support of efforts to develop improved waste and release reduction techniques;
 - c. Assisting in establishment of regional air monitoring networks;
 - d. Participation in efforts to develop consensus approaches to the evaluation of environmental, health, and safety impacts of releases;
 - e. Providing educational workshops and training materials;
 - f. Assisting local governments and others in establishment of waste reduction programs benefitting the general public.
11. Periodic evaluation of waste management practices associated with operations and equipment at each member company facility, taking into account community concerns and health, safety, and environmental impacts and implementation of ongoing improvements.
12. Implementation of a process for selecting, retaining, and reviewing contractors and toll manufacturers taking into account sound waste management practices that protect the environment and the health and safety of employees and the public.
13. Implementation of engineering and operating controls at each member company facility to improve prevention of and early detection of releases that may contaminate groundwater.
14. Implementation of an ongoing program for addressing past operating and waste management practices and for working with others to resolve identified problems at each active or inactive facility owned by a member company taking into account community concerns and health, safety, and environmental impacts.

Industry Trend Data

To develop and maintain statistical industry trends, CMA will collect currently available data. Each company shall report annually to CMA, or its designated agent, for each facility:

- o Releases of substances as reported under SARA Section 313; and
- o Wastes generated, as defined and reported in CMA's annual waste survey.

Member Self-Evaluation.

Each member company shall report annually to CMA, or its designated agent, the stage of implementation of each management practice in this Code. The reports shall be on the member self-evaluation form attached as Attachment A.

Glossary of Terms

As used in this Code, key terms are defined as set forth below. Note that these definitions may be broader than regulatory definitions, and that adherence to this Code does not relieve a company of the obligation to meet Federal, state and local regulatory requirements.

Facility - A site used for chemical manufacturing, processing, refining, packaging, R&D, distribution or related commercial activity.

Recycle - A practice which regenerates or processes a material from a process to recover a useable product or material for reuse.

Release - Any emission, effluent, spill, discharge or disposal to the air, land, or water, of any pollutant or contaminant, whether routine or accidental, at or from a facility. The term does not include shipment or distribution of chemical product, nor release to the environment as part of normal and intended use of a product by the consumer.

Reuse - A practice that reemploys a material from a process either as an ingredient in a process to make a product, or as an effective substitute for a commercial product in a particular function or application.

Source Reduction - A practice that reduces the amount of any release or waste generated at the source, including closed loop recycle and reuse before exit from a process. The term includes, among other practices, equipment and technology modifications, process and procedures modifications, reformulation and redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training and inventory control.

Treatment - A practice, other than recycle or reuse, that alters the physical, chemical, or biological characteristics or the volume of a waste through a process or activity separate from the production of a commercial product or the provision of a service.

Waste - Any gas, liquid, or solid residual material at a facility, whether hazardous or non hazardous, that is not used further in the production of a commercial product or provision of a service and which itself is not a commercial product.

WASTE AND RELEASE REDUCTION
CODE OF MANAGEMENT PRACTICES
QUESTIONS AND ANSWERS

1. Is this a voluntary or mandatory policy?

Answer: The Waste and Release Reduction Code of Management Practices has been developed under CMA's Responsible Care program. Adherence to the Responsible Care guiding principles is an obligation of membership in CMA.

2. Must the Management Practices be completed in the specific order listed?

Answer: The Management Practices are laid out in a logically sequential pattern to complete a reduction project. The sequence should be generally adhered to although slight re-arrangement under specific circumstances may be warranted.

3. Since the scope of this policy covers all hazardous and non-hazardous wastes and releases, doesn't the Code require too much too fast or dilute the focus from hazardous pollutants?

Answer: The public is not seeing or making a distinction between hazardous and non-hazardous releases and wastes. Public opinion research shows that the public wants releases lowered and performance improved. This research indicates that the public is concerned about both chemicals and trash generated by industry.

The definition of "hazardous" is not uniform throughout the United States, since many states have their own definitions that are more restrictive than the federal EPA's. Furthermore, these definitions of "hazardous" keep changing over time.

Each company is starting from differing points. Each company must identify its own reduction opportunities, identify the concerns of its own public, determine the reduction priorities and goals, and develop and implement its own reduction plan. The goal of this Code is continued performance improvement by a long term commitment to the reduction of wastes and releases.

4. Why does this Code appear to endorse reductions for reductions sake? Why should wastes and releases be reduced below health-based standards? Why should wastes and releases be reduced below levels allowed by statute, regulation, or permit?

Answer: The public does not endorse the concept of "permitted" generation of wastes or releases to the environment. The public desires an increased margin of safety and environmental protection as a goal. If the policy is to address the concerns of the public, it must require sustained reductions.

-
5. Is this Code a never-ending spiral of reduction?

Answer: The policy is flexible so that each company can assess the viability of further reductions. Certainly, reductions will be sustained under the Code as long as they are technically and economically viable. To the extent reduction options remain viable, the goal is to establish a long-term, substantial downward trend in wastes generated and releases to the environment.

6. Will this Code cause member to accomplish substantive reduction?

Answer: To achieve the goal of earning the public's trust through improved performance, real reductions must occur. Therefore, this Code has measurable implementation stages and industry trends data submission requirements.

7. Does this Code apply to both large and small companies and facilities? Is there a threshold below which this Code does not apply?

Answer: The Code applies to all members of CMA. Even a small company or facility can generate wastes and releases to the environment. There is no threshold for volume of wastes generated, releases to the environment, or size of facility below which this Code does not apply. Each company/facility will establish its own priorities. The Code envisions progress by all of industry in reducing wastes and releases.

8. Does this Code apply to domestic or world-wide operations?

Answer: The principles behind the Code are universal in concept. The reduction of wastes and releases is good business and good citizenship. However, for purposes of CMA eligibility requirements, the Code applies to that portion of a corporation or company that is used to determine CMA dues.

9. What about multi-divisional companies? Does this Code apply to mining operations? Service stations? Warehouses?

Answers: Adherence to the Code of Management Practices is a Guiding Principle of the Responsible Care program. The Responsible Care program is a membership requirement for those portions of a company that determine the CMA dues structure. The principle of reducing wastes and releases is responsible corporate behavior and should be encouraged throughout an organization.

The Waste and Release Reduction Code of Management Practice is designed for flexible implementation by companies and facilities. Each company/facility must determine the reduction opportunities, ~~priorities, baseline, and implement the reduction plan in~~ accordance with these company/facility-derived goals. Inherent in this Code is the need to communicate with the public when determining reduction opportunities and priorities. Therefore, while the scope of this policy is broad, each company must identify the sources that are included in its implementation activities as well as the priority and timing for these reduction activities.

10. If all of the chemical industry is to be affected, how do we ensure fair and equitable reductions? How do we prevent competitive disadvantages among CMA member companies?

Answer: The Waste and Release Reduction Code is predicated on making reductions that are economically and technically sound. The Code does not envision enforcing competitive disadvantages on member companies by usurping their decision-making processes. Each company must evaluate its own reduction opportunities and develop its own reduction plan to meet company/facility priorities.

11. If all of the chemical industry is to be affected, how do we ensure fair and equitable reductions? How do we prevent competitive disadvantages with other industry segments?

Answer: This Code will actually make our industry more competitive than those that do not embrace its concepts. Waste and release reductions will result in less wastes, improved efficiency, and make the industry a superior competitor.

12. Is this a non-growth Code? How can this Code be reconciled with the need for expansions? How are opportunities for emission offsets (needed for air permitting) to be preserved?

Answer: This Code envisions a long-term, substantial downward trend in total releases to the environment and waste generation. However, the method of achieving reductions is left to the needs and priority determinations of the individual member companies.

The policy is not a no-growth policy; rather, it is a policy of balancing future expansions with future waste and release reductions.

Voluntary waste and release reductions may be eligible to be banked with appropriate governmental agencies. Any plan for waste and release reductions must also plan to accommodate expansions. Public perceptions may ultimately require a waste and release reduction type program just as a condition to be able to construct or expand. Several states already have proposed such regulations.

13. Won't this Code have enormous economic consequences?

Answer: Waste and release reductions may or may not have a huge price tag. Some reduction projects, like fugitive emission abatement, tend to pay for themselves in recovered product(s); other projects may increase the price of doing business. Industry must be willing to invest in plants that will lead to a future with less wastes and fewer releases to the environment. The goal of Responsible Care is that the chemical industry will improve the performance of its operations constantly.

In making reduction progress, each company must look at all the reduction opportunities and set their own priorities. Each company can set the scope of these priorities broadly or narrowly and implement actions at their own pace.

Each company must identify its own reduction priorities and implement a reduction plan to meet company/facility-set goals.

14. Does the hierarchy of reduction methodologies mean that all projects must use source reduction unless it is technically infeasible?

Answer: Each waste and release source must be evaluated for its reduction potential. The hierarchy requires that reduction projects for source reduction be evaluated before recycle/reuse or treatment. However, the project to be implemented will depend on the evaluation.

Technical infeasibility is only one of several facility and/or waste specific criteria that can lead to selection of a reduction project involving recycle/reuse or treatment. When developing their reduction priorities, companies may choose to consider other criteria including risk/benefit mechanisms, public concern, size of the facility, economics, and other factors such as conservation of resources.

15. This Code, as well as other codes under the Responsible Care program, require ongoing dialogues with employees and members of the public. Does each such Management Practices require a separate meeting?

Answer: No. Meetings with employees or the public can have multiple agenda items. If several Management Practices items are to be covered in a single meeting, all that is required is that the agenda and presentation clearly address each topic, rather than have a general "discussion of topics."

~~Under the Responsible Care Program, the process to communicate with the public and employees is established under the Community Awareness and Emergency Response (CAER) Code of Management Practice. Companies are encouraged to use the mechanisms set up under other codes to enhance effective implementation of the Responsible Care Program and to better use and conserve company resources.~~

16. Is dialogue with the public required for all facilities?

Answer: Meaningful dialogue is essential to better understanding public concern, improving the public's understanding of our operations, and building trust. Some facilities, due to size and location, may have limited opportunity for such dialogue. Where the opportunity for dialogue exists, even on a limited basis, it should be actively pursued individually or jointly with other neighboring companies/facilities.

17. Should individual companies and/or facilities submit to CMA the rationale behind the annual Industry Trend data submissions?

Answer: No. The data submitted for the Industry Trend Data reports need not have supporting documentation submitted to CMA. However, when discussing these data with the local public, it is assumed that general methods and assumptions will be discussed as part of the public education and dialogue process.

18. When completing the Self-Evaluation Form, must every facility attempt to progress through all the implementation stages, or can some facilities "mature" their progress in code implementation at less than full implementation?

Answer: All participating facilities should work to achieve full implementation of each Code and embrace the concepts of this Code in the spirit of the Responsible Care Guiding Principles. Depending on the size of particular facility or the activities carried on by that facility, a company may decide that different implementation methods are appropriate. For example, a large facility may use formal procedures such as written policies and

manuals and conduct formal employee meetings. Whereas, a smaller facility can accomplish the same implementation using less formal methods.

Attachment B

QUESTION AND ANSWERS FOR
PRACTICES 11-14

These questions address issues in the four practices added to the Pollution Prevention Code of Management Practices. As companies implement Practices 1-10, they should examine their implementation actions and modify them to include waste management.

QUESTIONS:

IN PRACTICE 11, WHAT ARE THE WASTE MANAGEMENT
PRACTICES ASSOCIATED WITH ALL OPERATIONS
AND EQUIPMENT?

The Code envisions companies reviewing all waste management practices at each step of the operation(s) where wastes are generated or released within each facility. This review is within the operating processes not just at the "end of the pipe."

WHAT DO YOU MEAN BY A CONTRACTOR
AND TOLL MANUFACTURER?

Contractors are any entity a member company uses to handle its secondary materials and wastes. This includes, for example, waste treatment facilities, disposal facilities, tank cleaners, reclaimers, recyclers, and the like. "Contractors" does not include publicly owned treatment works.

Responsible Care® covers toll manufacturers' operations under two Codes. This code covers the wastes generated by relevant operations of toll manufacturers. For the purpose of this code, toll manufacturers are independent parties who: perform a manufacturing step for a member company in which the member company owns the work in process; use the member company's feed stock; and generate waste from the manufacturing step.

WHAT DOES "IMPLEMENTATION OF A PROCESS. . . ." MEAN?

The requirement for the "Implementation of a process. . . ." is designed to encourage member companies to do business with those contractors and toll manufacturers that, after reasonable inquiry, are believed to engage in sound waste management practices.

As part of the contracting procedure, member companies should consider including language requiring the contractor to use proper health, safety, and environmental practices and stating that the member company has a right to inspect for that purpose.

HOW DO YOU REVIEW THAT A CONTRACTOR OR TOLL MANUFACTURER USES SOUND WASTE MANAGEMENT PRACTICES?

A process for "reviewing" includes reasonable reviews of the relevant practices of contractors and toll manufacturers. Because of the variety of commercial relationships and circumstances, member companies are to exercise their own judgement as to how to conduct "reviews" and precisely what to do with the information obtained.

CMA members are not expected to control the operations of their contractors and toll manufacturers. CMA member companies should consider performing a site visit and visual inspection of waste management practices by a company representative. The member company may determine that a more rigorous inspection is appropriate based on initial findings.

HOW OFTEN SHOULD YOU REVIEW CONTRACTORS AND TOLL MANUFACTURERS?

A review or evaluation should be done on some repeat basis. Companies should determine the timing by an evaluation of the results of previous reviews, potential impacts, potential liability, etc.

WHAT DO WE MEAN BY "IMPROVE THE PREVENTION OF RELEASES TO GROUNDWATER?"

The goal is to prevent releases to the ground and to protect existing groundwater quality. While it is envisioned that a company will have an SPCC (Spill Prevention Control and Countermeasures) plan for certain materials, companies should review the chemicals at the facility and extend the SPCC concepts to other materials. To improve efforts to prevent releases, member companies should review the chemicals and operations at a facility; develop plans to prevent, detect, and contain releases or potential releases; and implement these plans to protect groundwater from contamination.

IN PRACTICE 14 WHAT IS MEANT BY IMPLEMENTATION OF
AN ONGOING PROGRAM TO RESOLVE IDENTIFIED PROBLEMS?

"Implementation of an ongoing program..." means developing processes for evaluating the health, safety, and environmental impacts of identified problems arising from past operating and waste management practices and for setting priorities for addressing those problems. The Code recognizes that not every identified problem poses adverse impacts. Resolving identified problems should consider factors such as, regulatory, technical, and economic considerations.

WHAT IS MEANT BY "PAST OPERATING AND
WASTE MANAGEMENT PRACTICES?"

Past operating practices and waste management practices that companies should consider may include operating practices such as: manufacturing operations, loading and unloading areas, storage, areas of spill containment, and recycling and reuse processes; and waste management practices such as: surface impoundments, waste treatment, land disposal, land treatment and farming, and deepwell injection.

WHAT IS MEANT BY "WORKING WITH OTHERS TO
RESOLVE IDENTIFIED PROBLEMS?"

Each member company's program should include a process to cooperate, to the extent appropriate, with governmental agencies, past owners, operators, insurance carriers, the community, and others to resolve the potential health, safety, and environmental impacts, and community concerns associated with identified problems.

WHICH MEMBER COMPANY FACILITIES, ACTIVE OR
INACTIVE, ARE INCLUDED IN PRACTICE 14?

This practice applies to facilities currently owned by a member company. This includes properties that are still owned, but no longer have ongoing operations. Inactive sites that are not owned by a member company, but where the company has potential involvement, should be addressed to the extent the member company determines feasible.

WHAT IS MEANT BY "TAKING INTO ACCOUNT
COMMUNITY CONCERNS AND HEALTH, SAFETY,
AND ENVIRONMENTAL IMPACTS?"

When CMA member companies implement the employee and public outreach of the Code (Practices 4 and 8), companies should present information about their current and past waste management practices with the goal of identifying the community concerns. Companies should consider this input when developing plans and setting priorities for waste management and remediation activities.

POLLUTION PREVENTION CODE

REPORT 1: MEMBER SELF-EVALUATION FORM FOR THE 1992 REPORTING YEAR

SAMPLE

Instructions for the Company Responsible Care® Coordinator:

1. This form is to be submitted annually to CMA by each member company. This year the due date is XXX 31, 1992.
2. Indicate on page 1 the number of your member company's facilities that are subject to the Code. Each company's Responsible Care® Coordinator must report the implementation stage for all facilities subject to the Pollution Prevention Code on this form.
3. The Self Evaluation form for the 1992 reporting year covers fourteen management practices. **DO NOT COMPLETE THIS FORM.** [CMA will send the Self Evaluation Form for the 1992 reporting year in April/May 1993.]
4. For each Management Practice on the following pages, indicate the number of facilities that have attained each implementation category. Identify the current implementation category for each of your facilities at the time you complete the form.
5. For the Industry Trend Data, show the total number of facilities in each appropriate box. The total number of facilities for each type of Trend Data should equal the total number of facilities subject to the Code.
6. Only subject facilities owned or operated as of the reporting date should be included.
7. The implementation categories are:
 - Category A - No action. If no action taken because the management practice is not applicable, please explain.
 - Category B - Evaluating existing company practices against the Management Practice.
 - Category C - Developing plan to implement Management Practice.
 - Category D - Implementing action plan
 - Category E - Management Practice in place.
 - Category F - Reassessing Management Practice implementation.
8. If any facilities are shown in Category A, please add any pertinent remarks to the space marked "comments."

SAMPLE

POLLUTION PREVENTION CODE OF MANAGEMENT PRACTICES

REPORT 1: MEMBER SELF-EVALUATION FORM FOR THE 1992 REPORTING YEAR

Member Company

Name: _____

Responsible Care® Coordinator

Name: _____

Address: _____

Telephone: () _____

Number of facilities subject to the Pollution Prevention Code _____

POLLUTION PREVENTION CODE OF MANAGEMENT PRACTICES

Management Practices

Categories

A B C D E F

<p>1. A clear commitment by senior management through policy, communications, and resources, to ongoing reductions, at each of the company's facilities, in releases to the air, water, and land and in the generation of wastes.</p> <p>Comments on Category A: _____ _____ _____</p>						
<p>2. A quantitative inventory at each facility of wastes generated and releases to the air, water and land, measured or estimated at the point of generation or release.</p> <p>Comments on Category A: _____ _____ _____</p>						
<p>3. Evaluation, sufficient to assist in establishing reduction priorities, of the potential impact of releases on the environment and the health and safety of employees and the public.</p> <p>Comments on Category A: _____ _____ _____</p>						
<p>4. Education of, and dialogue with, employees and members of the public about the inventory, impact evaluation, risks to the community.</p> <p>Comments on Category A: _____ _____ _____</p>						

SAMPLE

Categories

A B C D E F

<p>5. Establishment of priorities, goals and plans for waste and release reduction, taking into account both community concerns and the potential health, safety, and environmental impacts as determined under Practices 3 and 4.</p> <p>Comments on Category A: _____ _____ _____</p>						
<p>6. Ongoing reduction of wastes and releases, giving preference first to source reduction, second to recycle/reuse, and third to treatment. These techniques may be used separately or in combination with one another.</p> <p>Comments on Category A: _____ _____ _____</p>						
<p>7. Measurement of progress at each facility in reducing the generation of wastes and in reducing releases to the air, water, and land, by updating the quantitative inventory at least annually.</p> <p>Comments on Category A: _____ _____ _____</p>						
<p>8. Ongoing dialogue with employees and members of the public regarding waste and release information, progress in achieving reductions and future plans. This dialogue should be at a personal, face-to-face level, where possible, and should emphasize listening to others and discussing their concerns and ideas.</p> <p>Comments on Category A: _____ _____ _____</p>						
<p>9. Inclusion of waste and release prevention objectives in research, and in design of new or modified facilities, processes, and products.</p> <p>Comments on Category A: _____ _____ _____</p>						

SAMPLE

Categories

A B C D E F

10. An ongoing program for promotion and support of waste and release reduction by others, which may, for example, include:

- a. Sharing of technical information and experience with customers and suppliers;
- b. Support of efforts to develop improved waste and release reduction techniques;
- c. Assisting in establishment of regional air monitoring networks.

- d. Participation in efforts to develop consensus approaches to the evaluation for environmental, health, and safety impacts of releases;
- e. Providing educational workshops and training materials;
- f. Assisting local governments and others in establishment of waste reduction programs benefitting the general public.

Comments on Category A: _____

SAMPLE

11. Periodic evaluation of waste management practices associated with operations and equipment at each member company facility, taking into account community concerns and health, safety, and environmental impacts and implementation of ongoing improvements.

Comments on Category A: _____

12. Implementation of a process for selecting, retaining, and reviewing contractors and toll manufacturers taking into account sound waste management practices that protect the environment and the health and safety of employees and the public.

Comments on Category A: _____

Categories

A B C D E F

13. Implementation of engineering and operating controls at each member company facility to improve prevention and early detection of releases that may contaminate groundwater.

Comments on Category A: _____

~~14. Implementation of an ongoing program for addressing past operating and waste management practices and for working with others to resolve identified problems at each active or inactive facility owned by a member company, taking into account community concerns and health, safety, and environmental impacts.~~

~~Comments on Category A: _____

_____~~

SAMPLE