

Chiron

July 16, 1988

MEMORANDUM

To: Samuel D. Chilcote, Jr.
From: Susan Stuntz
Re: EPA Coalition *SMS*

As a result of our discussions with legal counsel, and consultants at Paul, Hastings, Janofsky & Walker, Institute staff was directed to work through consultants to assess the feasibility of developing a coalition of businesses able to work effectively with the Environmental Protection Agency and other regulatory agencies concerned with indoor air quality.

Broad based business coalitions have been able to work with EPA on other issues in the past. This approach continues to appear to be the best avenue available to us, given the agency's current hostility toward the tobacco industry.

We have made a great deal of progress since those initial discussions; such a coalition is not only feasible, but is being organized by representatives of the chemical industry with established working relationships with the EPA. They are relying on their past experiences to make this group work. We are pursuing the opportunity presented by this development.

The coalition will be called the Business Council on Indoor Air. A prospectus, which has been reviewed by counsel at Covington & Burling, is attached. Members will be individual companies concerned about indoor air.

As the prospectus notes, the coalition will communicate directly with regulatory agency officials, the news media, and others to demonstrate the importance of good ventilation as the solution to indoor air problems.

Membership will include two types of companies -- those manufacturing alleged pollutants, and those that analyze and clean up the indoor air. In the first category, Dow Chemical, Monsanto, 3M, Owens Corning Fiberglass, S.C. Johnson, Procter and Gamble and Clairol all are likely prospects. In the second category, ACVA Atlantic, ENV Services and Honeywell are likely charter members.

The tobacco industry will not be represented directly.

Dr. Paul Cammer, president of Cammer and Associates, a consulting firm that represents chemical companies on regulatory issues, will manage the Council. Cammer, a former EPA official, has been working with his clients to form an indoor air group. His resume is attached.

Cammer estimates that start-up costs for a 3 to 4 month period will be no more than \$40,000. This will cover his fees, printing of stationery and a pamphlet, legal fees and limited travel. These costs would be covered by charter dues payments of about \$5,000 per member. We expect that The Institute will underwrite the dues for several charter members -- ACVA, ENV, and possibly a few others. After the initial start-up, the coalition will set its own budget and share costs accordingly.

Although Cammer anticipates no problems raising the funds needed, we have agreed to guarantee him the full amount in the event the coalition fails for lack of support.

Cammer, coordinating closely with Peter Sparber, who reports progress to me regularly, will proceed throughout the summer to recruit members. Gray Robertson of ACVA has agreed to accompany him on some of these trips; Robertson also has agreed to attempt to recruit additional ventilation members.

A meeting of actual and prospective charter members is scheduled for September 20 in Washington, D.C.

I will be glad to answer any questions you might have.

Attachments

cc: William Kloepper
Robert Lewis
Jeffrey Ross