

# www.chlorineinstitute.org

## JOIN US FOR CI'S 2024 VIRTUAL FALL MEETING!

2024 is special, it marks **100 years** of the Chlorine Institute! We are excited to continue celebrating reaching this milestone at the Fall Meeting. We are planning four days of sessions ranging from our regular business meetings, forums to share industry best practices and lessons learned, to technical educational sessions. You don't want to miss this event!

On **Monday** the General Session speaker, Steven Phillips, Partner and Chair of Government Affairs and Public Policy at DLA Piper, will kick off our meeting with a discussion about the impact of various election scenarios on the regulatory environment. Following the General Session, the Product Stewardship Issue Team (PSIT) will meet. We will end the day with an educational session covering the Clean Water Act Hazardous Substances Facility Response Plans and Source Water Protection from Steve Allgeier.

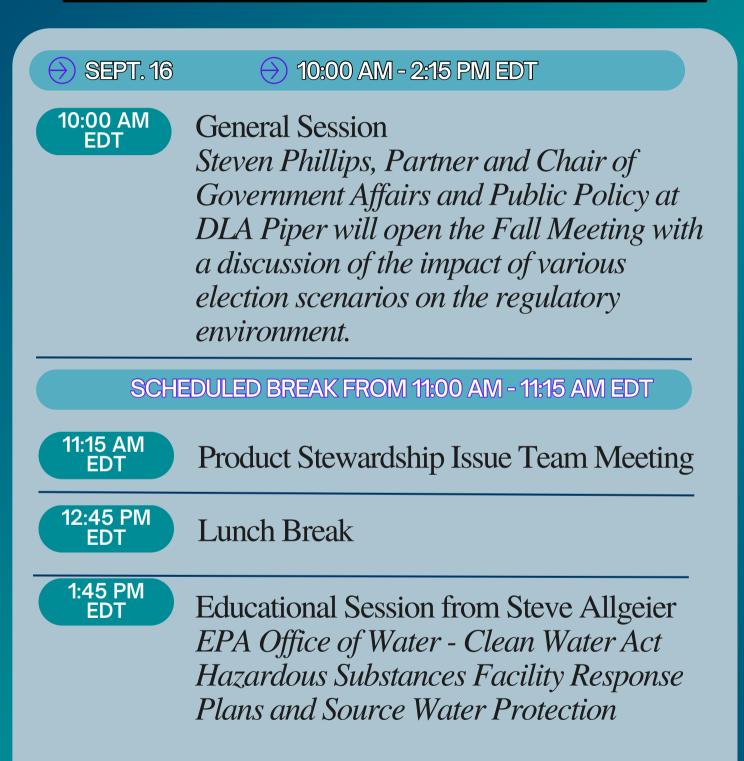
The activities on **Tuesday** start with the Emergency Preparedness Issue Team (EPIT) meeting. After the EPIT meeting, Kevin Daniel from the EPA will give a presentation on the recently updated Risk Management Program Safer Communities by Chemical Accident Prevention Final Rule, commonly referred to as RMP. In the afternoon the Health, Environment, Safety & Security Issue Team will meet and conclude day two of the Fall Meeting.

**Wednesday** will begin with the Transportation Issue Team. After that, Paul Stancil, Senior Hazmat Accident Investigator at the National Transportation Safety Board (NTSB), will discuss the East Palestine investigation report. At 1:30 PM EDT the Transportation Member Exchange will be held, and the Executive Committee Meeting (closed session) will wrap up the day.

On **Thursday** morning, the CI Board of Directors will meet at its regular business meeting.



# MEETING SCHEDULE DAY 1









# MEETING SCHEDULE DAY 2







# EDUCATIONAL SESSIONS



## 🔿 SEPT. 16

#### 🗩 1:45 PM - 2:15 PM EDT

## Educational Session from Steve Allgeier Title: Clean Water Act Hazardous Substances Facility Response Plans and Source Water Protection

On March 28, 2024, the U.S. Environmental Protection Agency (EPA) published the Clean Water Act Hazardous Substances Facility Response Plans (CWA HS FRP) final rulemaking to the Federal Register, which established a new program for facilities possessing certain CI Mission Chemicals above defined quantities. This new rule aims to protect U.S. source waters from chemical pollution and adverse impacts.

## EPT. 17

11:45 AM - 12:15 PM EDT

## Educational Session from Kevin Daniel Title: Clear Air Act Risk Management Program - Safer Communities by Chemical Accident Prevention Final Rule

On March 11, 2024, the U.S. Environmental Protection Agency (EPA) published the Safer Communities by Chemical Accident Prevention (SCCAP) rule to the Federal Register, which amends the Risk Management Program (RMP). This amendment targets to provide additional protection to vulnerable communities from chemical accidents.

### SEPT. 18

#### 🔿 11:45 AM - 12:15 PM EDT

## Educational Session from Paul Stancil Title: *East Palestine*, *OH Derailment Investigation Report*

On February 3, 2023, there was a derailment and subsequent hazmat release in East Palestine, OH which the National Transportation Safety Board (NTSB) investigated. Among the derailed railcars included five vinyl chloride (VCM) tank cars from which the VCM was eventually vented and burned to eliminate the product. The NTSB used CI's Pamphlet 171 as a resource when reviewing items related to the VCM railcars. In its final investigation report, the NTSB had three recommendations for CI related to the risk of VCM polymerization discussed in Pamphlet 171, CHLOREP Level 3 Contractor training and qualifications, and shipper members communicating product expertise to Incident Command. There were additional recommendations issued to the FRA, PHMSA, and AAR that may be impactful to CI members. The NTSB's senior hazardous materials investigator, Paul Stancil, will present an overview of the investigation, including tank car and hazmat related findings and recommendations.

# 2024 FALL MEETING SPEAKERS

#### **SENATOR STEVEN PHILLIPS**

Partner, DLA Piper Chair, Government Affairs and Public Policy

Steven Phillips focuses his practice on the representation of corporations, associations, and foreign governments before Congress, the Administration, and federal agencies, with a concentration on issues related to trade, technology, defense, homeland security, health care, artificial intelligence, environment and energy. He has also advised clients that face Congressional investigations and helps them to navigate through Congressional hearings and the potential impacts of such investigations.



Steven advises clients on congressional strategies, including congressional investigations; the legislative process; and the regulatory process. He spent 10 years working in the Senate including as a Legislative Director. Steven has regularly been ranked as a "top lobbyist" by the Washington, D.C. publication, The Hill.

Prior to joining DLA Piper, Steven served as legislative director and counsel to a U.S Senator. During his 10 years in Congress, Steven developed and implemented the Senator's legislative strategy and managed his legislative staff. He served as the senior policy advisor to the senator on a broad range of issues, including technology, appropriations, trade, tax, communications, health care, energy, and environment. Steven's responsibilities included drafting legislation and speeches, in addition to providing advice on Senate floor strategy.

Prior to working in the Senate, Steven served as a law clerk for a mid-size French law firm and as a law clerk to a firm in Raleigh, North Carolina. He is fluent in French and has traveled extensively in Europe and Asia.



# 2024 FALL MEETING SPEAKERS



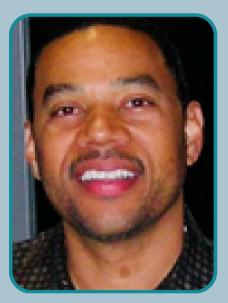
#### **STEVE ALLGEIER**

#### Environmental Engineer Senior Advisor

Steve Allgeier is an Environmental Engineer Senior Advisor with the U.S. Environmental Protection Agency's Office of Ground Water and Drinking Water, Water Infrastructure and Cyber Resilience Division. Steve joined U.S. EPA in 1996 where he has worked on a variety of regulatory, security, and technical assistance programs supporting the drinking water sector. Currently, Steve's areas of focus include treatment chemical supply chain resilience, source water contamination preparedness, and distribution system monitoring. Steve is also a member of the American Water Works Association. Steve will present on Clean Water Act Hazardous Substances Facility Response Plans and Source Water Protection on Monday at 1:45 pm EDT.

# 2024 FALL MEETING SPEAKERS

#### Kevin Daniel RMP Coordinator/Inspector



Kevin started his career 23 years ago in the EPA Management Intern Program where he worked in numerous offices including, Front Office of Air and Radiation EPA-HQ, Criminal Enforcement Division's (CID) Strategic Information Office, Herndon, VA, Office of Transportation and Air Quality (OTAQ) EPA- HQ, Water Enforcement Division EPA- HQ, Toxics Release Inventory (TRI) in Region 9, Special Assistant to Director, Office of Air and Radiation Laboratory, UNLV in Region 9 and Spill Prevention Control and Countermeasures (SPCC) in Region 3-EPA Office. After Kevin's intern program ended, he remained in Region 3-EPA Office and became a Risk Management Program (RMP) Coordinator/Inspector where he completed 400 RMP inspections and lead some of EPA's most

notable RMP enforcement cases including, Hershey Creamery (received first of its kind criminal guilty plea for RMP), Valero Delaware City Refinery, AL Solutions, Bayer Crop Science, Dupont Belle, and Philadelphia Energy Solutions (PES) explosion. Since most of these cases involved fatalities, Kevin collaborated closely with Chemical Safety Board (CSB), Occupational Safety and Health (OSHA) and other federal agencies. These enforcement cases lead to Kevin receiving numerous Office of Enforcement and Compliance Assurance awards for excellence. Most recently, Kevin worked in Federal Facilities Enforcement (FFEO) and is now with the Office of Land and Emergency Management (OLEM). Kevin graduated from Temple University, Suma Cum Laude, with High Honors with a BS in Biochemistry. Kevin will present on the Clear Air Act Risk Management Program on Sept. 16th at 11:45 am EDT.

# 2024 FALL MEETING SPEAKERS



#### PAUL L. STANCIL

National Resource Specialist, Sr. Hazardous

Materials Accident Investigator

Paul Stancil is a senior hazardous materials accident investigator with the NTSB Office of Railroad, Pipeline, and Hazardous Materials Investigations. He also serves as a nationally recognized technical expert in hazardous materials accident investigation. Mr. Stancil has investigated complex and diverse accidents involving hazardous materials releases in railroad, pipeline, highway, marine, and aviation transportation. Both nationally and internationally, he has served either as the investigator-in-charge (IIC) or as an investigative group chairman leading and managing groups of government and industry accident investigation experts.

During his 17 years with the NTSB, Mr. Stancil has been deployed to major transportation accident and incident investigations involving the release of hazardous materials and has identified transportation safety issues of national significance to prevent accidents and mitigate the severity of hazardous materials releases to communities and the environment. Much of his work has focused on the effectiveness of hazardous materials packaging and performance criteria, government regulatory framework, industry standards and best practices, carrier safety management systems, emergency preparedness and contingency planning, personnel training, incident management, and technologies used to mitigate environmental damage from hazardous materials releases in transportation.

With more than 47 years of experience in the field of hazardous materials investigations and environmental law enforcement, prior to joining the NTSB Mr. Stancil served as the chief investigator of the Maryland Office of the Attorney General Environmental Crimes Unit. Paul will present on the East Palestine Investigation Report on Sept. 18th at 11:45 am EDT.

# PRODUCT STEWARDSHIP ISSUE TEAM

SEPTEMBER 16, 2024 11:15 AM EDT

Chair: S	ade Healy (NYC DEP)
Vice Chair: Dieuhuong Sapon (Westlake Corporation)	
11:15 AM EDT	CI Antitrust Guidelines Review
Daniel Stein	Participants should review the Antitrust Guidelines attached to the Agenda.
11:17 AM EDT	<b>Opening Comments and Introductions</b>
Sade Healy	Discuss meeting purpose – review progress towards 2024 goal activities of the Product Stewardship Issue Team and discuss any barriers for completing tasks. All attendees will introduce
	themselves.
	Agenda Review
	Discuss any proposed changes to the Meeting Agenda.
	<b>Review and Approval of previous Meeting Minutes</b>
	Date of previous meeting: July 18, 2024 (PSIT Summer Meeting)
11:25 AM EDT	Goal 1 – PSIT Publications & Resources
Sade Healy & Daniel Stein	Determine what CI resources and delivery mechanisms are needed to meet member and non-member needs.
	<ul> <li>Discuss 2024 PSIT Publication &amp; Resource priorities <ul> <li>Review Task Group rosters and progression</li> </ul> </li> <li>Continued discussion of future publications</li> </ul>
11:45 AM EDT	Goal 2 – Sound-Science Regulation & Standards for CI's
Dieuhuong	Mission Chemicals
Sapon &	Review of Activity:
Daniel Stein	• CI's Fixed Facility Update
	• U.S. EPA – FIFRA/Pesticide Topics
	• U.S. EPA – SDWA/Disinfection and Contaminants Topics

## PRODUCT STEWARDSHIP ISSUE TEAM CONTINUED

6	Goal 2 – Sound-Science Regulation & Standards for CI's
	Aission Chemicals (continued)
	• U.S. EPA – CWA Hazardous Substance Facility Response Plans (HS FRP)
	• American Water Works Association (AWWA) Standards Committee on Disinfectants Activity
	NSF Joint Committee on Drinking Water Treatment
	Chemicals (NSF/ANSI/CAN Standard 60)
12:05 AM EDT	Goal 3 – Tri-Annual Incident Review
Sade Healy,	Provide update End-User incidents from EPA RMP/U.S.C.G.
Daniel Stein, &	NRC Databases
Jack Pendlebury	• Review Task Group roster
	• Discuss incident findings and any recommendations for
	PSIT's 2025 Goal Meeting
12:20 PM EDT	<b>Goal 4 – End-User Engagement &amp; Partnering for Educational</b>
Sade Healy & Daniel Stein	Outreach
	Establish partnerships and develop strategies for educational outreach.
	• Stratagia Initiativa Warking Crown programian

- Strategic Initiative Working Group progression
- Review prior AWWA ACE24 experience
- Discuss interaction with ASDWA
- Review upcoming 2024 Events of possible interest
- Discuss Water/Wastewater CEU Task Group activities

# PRODUCT STEWARDSHIP ISSUE TEAM

#### CONTINUED

<b>12:30 PM EDT</b> Sade Healy	Old Business
<b>12:35 PM EDT</b> Sade Healy & Daniel Stein	<ul> <li>New Business and Upcoming Fall Meeting</li> <li>Vice Chair / Chair Nominations</li> <li>2025 Budgetary Considerations</li> <li>CI Resource Library / PSIT Workroom</li> </ul>
12:45 PM EDT	Adjournment

SCHEDULED LUNCH BREAK FROM 12:45 PM - 1:45 PM EDT

## EMERGENCY PREPAREDNESS ISSUE TEAM

SEPTEMBER 17, 2024 10:00 AM EDT

### Chair: Mike Croke (JCI Jones Chemicals, Inc.) Vice Chair: Matt Bond (Westlake Corporation)

#### 10:00 AM EDT **CI Antitrust Guidelines Review**

Mike Croke

#### **Opening Comments and Introductions**

**Review and Approval of Previous Meeting Minutes** 

#### 10:05 AM EDT **CHLOREP Sector Engagement & Development**

Mike Croke Matt Bond Jack Pendlebury **Robyn Kinsley** 

#### The team will review all CHLOREP-related goals and activities, including:

- 2024 CHLOREP Team Training
- 2024 CHLOREP Level 2 Training
- CHLOREP in Mexico
- CHLOREP Leadership Calls
- CHLOREP Activations
- CHLOREP Sector Coverage
- CHLOREP Contractor Verifications
  - NTSB Recommendations
  - Program Documentation Updates
  - Verification Program Review
  - Status of Verifications

# EMERGENCY PREPAREDNESS ISSUE TEAM

#### CONTINUED

10:40 AM EDT	Training and Educational Outreach
Mike Croke	Review plans for 2024 emergency response outreach, including
Robyn Kinsley	hands-on TRANSCAER training events, webinars, and hazmat
	conferences.
	• 2024 TRANSCAER Training Events
	Training Car Status
	• 2025 TRANSCAER Training Plans
	TRANSCAER Training Growth
	Non-Chlorine Webinars
	• Spanish Webinars
	Hazmat Conferences
11:00 AM EDT	<b>Emergency Response Technology &amp; Resources</b>
Mike Croke	The team will review additional goals related to publication
Cindy Kuranchie	updates and other emergency response resources, including:
Robyn Kinsley	Chlorine Emergency Kit Video Updates
	Chlorine Emergency Kit Gasket Testing
	Orphaned Chlorine Container Resources
	Chlorine Transfer Pump Procedures
	• P-171) Vinyl Chloride Monomer (VCM) Tank Car & Cargo
	Tank Handling Manual
11:15 AM EDT	2025 Budget Proposals
Robyn Kinsley	The team will review 2025 project budget and seek approval.
11:25 AM	Other Business
All	Members are encouraged to bring up other items of business to
	discuss with the issue team.
11:30 AM EDT	Adjourn
All	

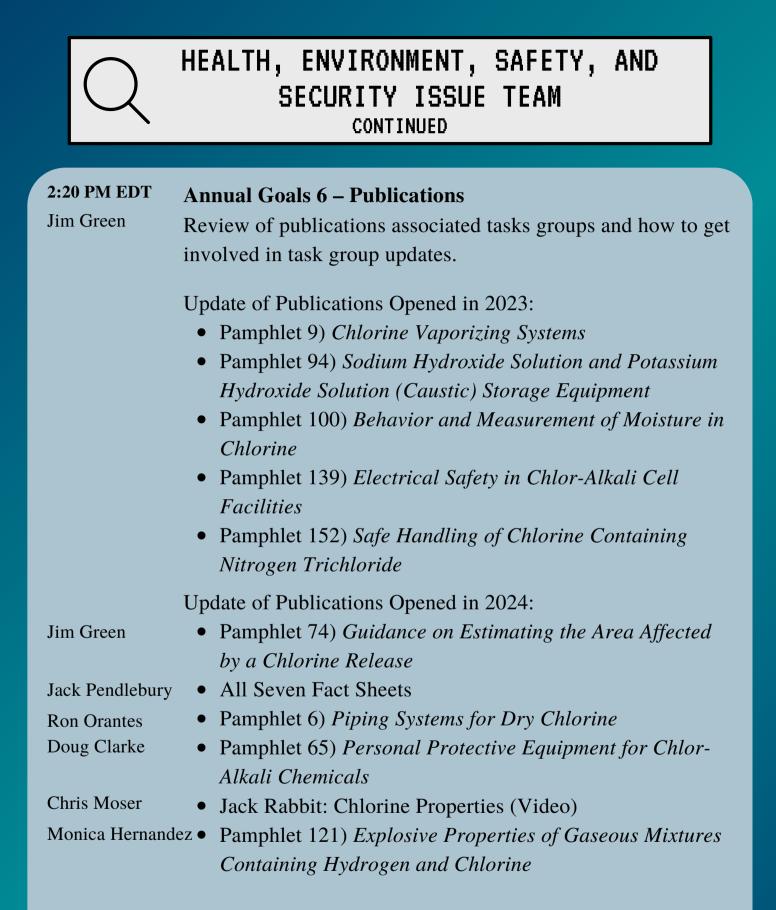
## HEALTH, ENVIRONMENT, SAFETY, AND SECURITY ISSUE TEAM

SEPTEMBER 17, 2024 1:15 PM EDT

Chair: Jim Green (SABIC) Interim Vice Chair: Ryan Estevens (Westlake Corporation)	
CI Antitrust Guidelines Review	
<ul><li>Participants should review the Antitrust Guidelines.</li><li>Opening Comments and Introductions</li><li>A discussion of this meeting and its purpose.</li></ul>	
Agenda Review Any proposed changes to the agenda will be decided.	
<b>Review and Approval of previous Meeting Minutes</b> Date of previous meeting: June 20, 2024	
<ul> <li>Annual Goal 1 – Aim for Zero Injuries and Incidents</li> <li>Safety and Process Safety Incident Performance for 2023; select incidents contained with the Performance Indicator Report will be discussed.</li> <li>Performance Indicator Report &amp; Transparent Data <ul> <li>Discuss ways to present and use the data to make more useful to CI members</li> </ul> </li> </ul>	
<ul> <li>Recruiting topics for Safety Alerts         <ul> <li>There will be a review of desired topics, and an invitation to members to submit incidents for future Safety Alerts</li> </ul> </li> </ul>	
<ul> <li>Progress Update from the Member Injury/Incident Task Group</li> <li>CI's Safety Story <ul> <li>Discuss what safety data may be suitable for public</li> </ul> </li> </ul>	

### HEALTH, ENVIRONMENT, SAFETY, AND SECURITY ISSUE TEAM CONTINUED

1:45 PM EDT	Annual Goal 2 – Safety Benchmarking, Best Practice and
Joe Rutledge	Knowledge Sharing
	• 2025 HESS+ Seminar Planning for 2025 Annual Meeting
	• Explain purpose of the HESS+ Seminar
	• Solicit speakers and topics
	• Safety Webinars
	• Solicit additional presenters
1:50 PM EDT	• Solicit additional topics
Jim Green	• Invitation to register for upcoming webinars
	Member Exchanges
	<ul> <li>Solicit topics for 2025</li> </ul>
	• Discuss feasibility of bilingual member exchange
2:00 PM EDT	Annual Goals 3 and 4 – Safety Benchmarking, Best
Jim Green	Practice and Knowledge Sharing
	• Discussion on sustainability and CI's role
	<ul> <li>Update on Product Category Rules</li> </ul>
	• Update on unclassified briefing from DHS
2:10 PM EDT	Annual Goal 5 – Promoting the Use of Sound Science in
Robyn Brooks	Rulemaking Impacting Chlor-Alkali
	Discussion on regulatory activity, ongoing HESS efforts, and
	anticipated regulatory activity, including:
	• OSHA's Proposed Emergency Response Rule
	• OSHA's Proposed Heat Rule
	• EPA's Clean Water Act Discharge Rule
	CFATS Status



#### HEALTH, ENVIRONMENT, SAFETY, AND SECURITY ISSUE TEAM CONTINUED

2:35 PM EDT Jim Green	<b>2025 Budget Proposals</b> The team will discuss preliminary list of budget requests for 2025.
	Old Business
Jim Green	<ul><li>New Business</li><li>Interesting government inspection requests or actions</li><li>Incident Sharing</li></ul>
All	<b>Future Meeting</b> Decide where to hold the next HESS Issue Team to set 2025 Goals.
2:45 PM EDT	Adjournment



## TRANSPORTATION ISSUE TEAM

SEPTEMBER 18, 2024 10:00 AM EDT

Chair: Larry Loman (AllTranstek) Vice Chair: Brian Sterling (Brenntag North America, Inc.)	
<b>10:00 AM EDT</b> Larry Loman	CI Antitrust Guidelines Review Opening Comments and Introductions
<b>10:05 AM EDT</b> Larry Loman Brian Sterling	<ul> <li>Review and Approval of Previous Meeting Minutes</li> <li>Incident Reduction Goals &amp; Metrics</li> <li>The team will review historical incident data trends and 2024</li> <li>incident reduction-related tasks group.</li> <li>Incident Data Review</li> <li>Root Cause Analysis of Transportation Incidents</li> <li>Layers of Protection for Accidental Mixing Events</li> </ul>
<b>10:30 AM EDT</b> Larry Loman	<ul> <li>Publications</li> <li>The team will review the status of 2024 publications activity.</li> <li>Publications Published in 2024: <ul> <li>Pamphlet 76) Guidelines for the Safe Motor Vehicular Transportation of Chlorine Cylinders and Ton Containers</li> <li>Pamphlet 168) Guidelines for Dual Valve Systems for Bulk Chlorine Transportation</li> <li>Pamphlet 170) Hydrogen Chloride, Anhydrous (AHCl), Refrigerated (UN 2186), Tank Car &amp; Cargo Tank Handling Manual</li> <li>Pamphlet 174) Guidelines on Tank Car Owner Responsibilities in Qualification and Maintenance</li> </ul> </li> </ul>



### TRANSPORTATION ISSUE TEAM CONTINUED

#### **Publications (continued)**

- CAUS-VIDEO) Preventing Non-Accident Releases by Properly Securing Caustic Railcars
- CLS-VIDEO) Preventing Non-Accident Releases from Chlorine Railcars by Properly Securing Return Shipments
- Publications ready for Approval:
  - Pamphlet 166) Angle Valve Guidelines for Chlorine Bulk Transportation
- Publications in Process:
  - Pamphlet 87) *Recommended Practices for Handling Sodium Hydroxide Solution and Potassium Hydroxide Solution (Caustic) Tank Cars*
  - Pamphlet 98) *Recommended Practices for Handling Hydrochloric Acid in Tank Cars*
  - Pamphlet 171) Vinyl Chloride Monomer (VCM) Tank Car & Cargo Tank Handling Manual
  - HCLS-VIDEO) Preventing Non-Accident Releases by Properly Securing Hydrochloric Acid Railcars

#### 10:50 AM EDT Regulatory & Industry Activity

Larry Loman Robyn Kinsley

The team will discuss 2024 goals related to various regulatory and industry activities impacting CI members.

- NTSB East Palestine Derailment Investigation
- DOT Activity (PHMSA & FRA)
  - HM-251G NPRM
  - HM-219C TIH Specification Issue
  - HM-265A ANPRM Issues



### TRANSPORTATION ISSUE TEAM CONTINUED

10:50 AM EDT	<b>Regulatory &amp; Industry Activity (continued)</b>
Larry Loman	AAR Tank Car Committee Activity
Robyn Kinsley	• AAR NDT Inspection Requirements
	<ul> <li>Tank Car Facility Audits</li> </ul>
	• AAR Delegated Authority
11:20 AM EDT	2025 Budget Proposals
	2025 Duuget I Toposais
Robyn Kinsley	The team will review 2025 project budget and seek approval.
11:25 AM EDT	Other Business
All	Members are encouraged to bring up other items of business to
	discuss with the issue team.
11:30 AM EDT	Adjourn
All	

### MEETING GUIDELINES

## **Antitrust Guidelines for CI Meetings**

The following provides participants in Chlorine Institute meetings with the most general principles of antitrust laws. The many different situations in which the antitrust laws may be implicated are not covered by this document. Any questions about the possible risks of antitrust liability should be referred to Institute counsel.

DO

- Have meeting agendas and minutes of meetings involving potentially sensitive issues approved by counsel prior to each meeting and before distribution.
- Fully describe in the minutes all actions taken at the meeting. Consult counsel on any matter with antitrust implications.

#### NEVER

- Agree, discuss or exchange with competitors information on product prices; methods of quoting prices; the establishment of uniform costs and markups or price differentials; or the submission of collusive, noncompetitive rigged bids. These activities have been found to constitute direct price-fixing.
- Agree or discuss with competitors methods of restricting price advertising; the use of specified accounting methods; limits on production or the establishment of quotas; fixing minimum product quantities sold; or fixing the amount of basic ingredients used in or resulting from production. These activities have been found to constitute arrangements indirectly affecting price.
- Agree to exclude, refuse to deal with, or retaliate against existing members of the association, potential new members of the association, or particular classes of suppliers or customers.
- Make any arrangements to divide the marketplace or allocate customers.
- Agree to consider excluding from guidelines or recommendations any products, services or equipment which may be safely used for the intended purpose.



## CI'S CORE VALUES

# **CI'S CORE VALUES**

In all that we do we have an unwavering commitment to operate at the highest level. This commitment extends to:



As an organization focused on safety we will keep safety first in all our actions and activities.



MEMBER SYNERGY

Satisfied and engaged members are essential to our effectiveness as an organization. We will achieve member satisfaction by understanding what our members need and helping them to achieve it in a collaborative way that is aligned with the mission of the Institute.



We will maintain an environment where all members and employees are treated with dignity. We will operate in an atmosphere that is free of offensive teasing or joking, bullying, harassment or discrimination of any kind.



DIVERSITY

We value the contributions, strengths and perspectives of our diverse team. This fosters creativity and builds an atmosphere that encourages continual learning, the sharing of ideas, experiences, and knowledge among both employees and members.



INTEGRITY

All interactions among members, employees, suppliers, regulatory agencies, and the public will be conducted in an honest and open way with the highest ethical standards.

# **MISSION STATEMENT**

THE CHLORINE INSTITUTE EXISTS TO SUPPORT THE CHLOR-ALKALI INDUSTRY IN ADVANCING SAFE, SECURE, ENVIRONMENTALLY COMPATIBLE, AND SUSTAINABLE PRODUCTION, DISTRIBUTION, AND USE OF ITS MISSION CHEMICALS.

\*CI'S MISSION CHEMICALS: CHLORINE, SODIUM AND POTASSIUM HYDROXIDES, SODIUM HYPOCHLORITE, THE DISTRIBUTION OF VINYL CHLORIDE MONOMER (VCM), AND THE DISTRIBUTION AND USE OF HYDROGEN CHLORIDE.