

ATTACHMENT A

Voluntary Product Stewardship Programs

On July 28, 1997, OPPTS signed a voluntary Product Stewardship Program “Memorandum of Understanding” (MOU) with AlliedSignal Inc for methyl ethyl ketoxime (MEKO), a high production volume chemical used primarily as an antiskinning agent in alkyd surface coatings and paints. This MOU addresses a number of important OPPT programmatic elements and goals, such as chemical testing, pollution prevention (P2), waste minimization, exposure reduction, and chemical hazard/risk information communication activities that AlliedSignal has agreed to undertake on a voluntary basis. The MOU also reflects OPPT's continuing efforts to expand the use of its TSCA Chemical Testing Program to achieve documentable progress in these EPA mission-related areas.

Specifically, AlliedSignal agreed to be a co-sponsor of MEKO in the “Screening Information Data Set (SIDS) program, a very important international voluntary testing program operated under the aegis of the Organization of Economic Development (OECD). In the area of P2, AlliedSignal agreed that steps deemed necessary to reduce and/or eliminate releases of and exposures to MEKO will be included in the company's development and implementation of a P2 program for AlliedSignal's MEKO operation. In order to measure progress in P2 for MEKO, AlliedSignal agreed to provide yearly reports to EPA for the next five years that will include release information of the type found in the Agency's current Toxic Release Inventory (TRI)/Pollution Prevention Act (PPA) Form R. AlliedSignal also agreed to communicate the “lessons learned” from the company's P2 program to all of its MEKO customers in an attempt to facilitate their P2 practices. Finally, AlliedSignal agreed to develop and implement their MEKO Product Stewardship Program in such a way as to help to “insure protection of health and the environment for people, regardless of race, ethnic background, or socio-economic status.”