

**DRAFT (6/21/17)**  
**(As revised by the Operating Protocol Workgroup)**

**OPERATING PROTOCOL  
OF THE  
NEGOTIATED RULEMAKING COMMITTEE  
TO  
NEGOTIATE A PROPOSED RULE TO LIMIT CHEMICAL DATA  
REPORTING (CDR) REQUIREMENTS UNDER SECTION 8(A) OF THE  
TOXIC SUBSTANCES CONTROL ACT (TSCA)**

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**1. BACKGROUND ON THE CDR INORGANIC BYPRODUCTS REPORTING REGULATORY NEGOTIATION**

On December 15, 2016, the United States Environmental Protection Agency (EPA) published a notice in the Federal Register (81 FR 90843) concerning its Intent to Establish a Negotiated Rulemaking Committee and negotiate a Proposed Rule on Chemical Data Reporting (CDR) Requirements under Section 8(a) of the Toxic Substances Control Act (TSCA), as amended by the Frank. R. Lautenberg Chemical Safety for the 21st Century Act (the Act). Section 8. Reporting and Retention of Information (a) (6) (A) of the Act states that the Administrator “shall enter into a negotiated rulemaking pursuant to subchapter III of chapter 5 of title 5, United States Code, to develop and publish, not later than 3 years after the date of enactment of the Frank R. Lautenberg Chemical Safety for the 21st Century Act, a proposed rule providing for limiting the reporting requirements, under this subsection, for manufacturers of any inorganic byproducts, when such byproducts, whether by the byproduct manufacturer or by any other person, are subsequently recycled, reused, or reprocessed.”

Negotiated rulemaking<sup>1</sup> is a process in U.S. administrative law that authorizes representatives of federal agencies, other government entities and representatives of stakeholder groups that will be significantly affected to engage in negotiations to develop recommendations for a proposed rule. If participants in a regulatory negotiation reach a consensus agreement on recommendations, the EPA will use them to the maximum extent possible, consistent with the legal obligations of the Agency, as the basis for a proposed rule that is published in the Federal Register. In developing the proposed rule, the EPA follows all of its normal and required rulemaking procedures. Because negotiated rulemaking

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<sup>1</sup> Negotiated rulemakings are also called regulatory negotiations or “reg-negs”. The terms are used interchangeably in this Operating Protocol.

committees are federal advisory committees, their formation and operation are governed by the Federal Advisory Committee Act of 1972, P.L. 92-463, 86 Stat. 770 (FACA).

## **2. STRUCTURE, COMPOSITION, AND ROLES OF THE NEGOTIATED RULEMAKING COMMITTEE**

### **2.1. Inorganic Byproducts Reporting Negotiated Rulemaking Committee**

The regulatory negotiation will be conducted in accordance with procedures required in the Negotiated Rulemaking Act (NRA) of 1996, and the FACA. This includes the formation of a Federal Advisory Committee composed of interested stakeholders.

In negotiated rulemaking, a committee is convened by the government that is composed of representatives of the government and key stakeholders that will be significantly affected by the proposed rule. The EPA has followed legally mandated rules and procedures to identify categories of stakeholders (see 2.2.1 below), appropriate stakeholder organizations and potential Committee Members (see APPENDIX A: Stakeholder Organizations and Committee Members participating in the Negotiated Rulemaking on Limiting Chemical Data Reporting (CDR) Requirements), propose nominees, and secure federal appointment of individuals who represent the diverse interests concerned about inorganic byproduct reporting under TSCA section 8(a).

The Committee will propose recommendations to EPA on “limiting the reporting requirements for manufacturers of any inorganic byproducts, when such byproducts, whether by the byproduct manufacturer or by any other person, are subsequently recycled, reused, or reprocessed” while maintaining TSCA objectives, for example as expressed in TSCA Section 2, “Findings, Policy and Intent”.

### **2.2. The Committee and its Members**

**2.2.1. Categories of Stakeholders** - Six categories of stakeholders identified during the convening process and in the Situation Assessment Report will be involved in the rulemaking:

- The U.S. Environmental Protection Agency (EPA)
- Tribes
- States
- Environmental/Health/Public Interest Organizations
- Manufacturing Industry Associations and Companies
- Recycling Industry Associations and Companies

Individual stakeholder organizations within each category were given the option of nominating up to two representatives to participate in the Committee. Once Committee Membership is established, no new members will be added unless a member is unable to continue participation and needs to be replaced.

**2.2.2. Roles and Responsibilities of the Committee and its Members:**

Members of the Committee will:

- Jointly discuss and determine the scope of negotiations and issues to be discussed consistent with the statutory mandate in Section 8 (a).
- Define the overall direction and process for development of recommendations or other actions consistent with EPA’s statutory mandate.
- Determine the mandates and scopes of work for any ad hoc workgroups that are established (which will be comprised of less than a quorum of the full Committee);
- Make decisions on proposals and recommendations developed by workgroups;
- Make final decisions on recommendations to be included in the Final Committee Report for a proposed rule to the EPA. The Committee will make decisions by consensus. (See definition of consensus below in Section 4 – How the Committee will make Decisions.)

### **2.2.3. Additional EPA Roles and Responsibilities**

- EPA will participate as a negotiator in the negotiated rulemaking and will represent the interests of the public, the Agency and other federal concerns. EPA will make best efforts to help the Committee reach consensus.
- EPA’s negotiators will maintain contact and communications with senior Agency leadership and other appropriate federal entities that may be affected by the rulemaking to assure they are apprised of the focus and progress of the talks and concur with the agreements on recommendations being reached by the Committee. EPA’s negotiators will also voice any concerns they have to the Committee in a timely manner.

### **2.2.4 Responsibilities after the Regulatory Negotiation**

- EPA has discretion to determine how any recommendations proposed by the Committee will be included in the proposed rule.
  - EPA commits to incorporate consensus recommendations, where appropriate, in a proposed rule as authorized by Section 8(a) of TSCA as amended by the Frank. R. Lautenberg Chemical Safety for the 21st Century Act. EPA may decide that some components of the Committee’s deliberations should be incorporated as part of the Agency’s guidance instead of a proposed rule. For example, there may be many circumstances in which clarification may be all that is needed. In that event, EPA staff will author any guidance updates and may request a review from Committee Members.
  - If a consensus is not reached on any issues raised or discussed in the regulatory negotiation EPA may develop a rule using its normal rulemaking authority and procedures outside of the negotiated rulemaking process, and/or revise its guidance. EPA has discretion to incorporate information obtained during the regulatory negotiation in a proposed rule. It will not, however, attribute incorporated information to the outcome of the regulatory negotiations.

### **2.2.4. The Regulatory Negotiation Process Workgroup –** The Process Workgroup will be responsible for coordinating the Committee’s work. It will make only procedural decisions, and no substantive decisions. Process Workgroup tasks include:

- Assisting the Facilitators in the development of agendas and approaches for addressing relevant issues;
- Coordinating issues to be discussed at upcoming meetings;

- Overseeing, along with the Facilitators, the functioning of workgroups; and
- Acting as liaison between the Committee as a whole and the Facilitators.

This workgroup will be comprised of a maximum of one representative from each of the six categories of stakeholders (see 2.2.1 above). Process Workgroup Members will be selected by each category of stakeholders. The same members may serve throughout the regulatory negotiation or may be changed by Members in their stakeholder category.

Each category of stakeholders will also select a second representative to the Process Workgroup who will participate in Workgroup calls or meetings if the primary representative is not available.

**2.2.5. Ad Hoc Workgroups** – The Committee, on an as needed basis, may establish Ad Hoc Workgroups. Workgroups may be comprised of Committee Members, technical experts, observers or others identified by Committee Members as having knowledge and expertise relevant to topics under discussion. Participation by non-Committee Members in Ad Hoc Workgroups is at the discretion of the Committee.

Workgroups may develop technical data as needed by the Committee for productive deliberations and, as appropriate, generate draft options or proposals for consideration by the full Committee regarding changes to the CDR Regulations. Options for the Committee’s consideration may also be developed by individual Committee Members or groups of Committee Members.

The use and number Workgroups shall not exceed the capacity of all stakeholder groups, if they so desire, to participate in them.

Workgroups do not have final substantive decision making authority on any issue. Workgroups, to the greatest extent possible, will bring consensus-based recommendations back to the Committee as a whole for its consideration and potential final decisions. (See definition of consensus in Section 4 – How the Committee will make Decisions.)

**2.2.6. Support from Committee Members’ Organizations or Constituents** – On an ad hoc basis, Committee Members may ask the Committee to allow staff from their organizations or agencies, members of their constituency groups or observers to provide relevant policy, legal or technical support for the problem solving process. The Committee may accept or reject a request by a Member for staff from their organization or agency to make presentations. When possible, the request for time on the agenda for a presentation will be made in advance. Individuals providing such support at Committee Meetings are not formal members of the Committee or authorized to participate in formal deliberations or decision making by the Committee.

**2.2.7. Public Input** – All Committee Meetings will be open to members of the public as observers. The public will also have opportunities to provide input, ask questions and receive answers from the members of the Committee at designated times during Committee Meetings.

The Committee will also accept written input or comments from members of the public. Input with the docket identification (ID) number EPA-HQ-OPPT-2016-0597 can be sent by one of the following methods:

- *Federal eRulemaking Portal:* <http://www.regulations.gov>. Follow the online instructions for submitting comments. Do not submit electronically any information you consider to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute.
- *Mail:* Document Control Office (7407M), Office of Pollution Prevention and Toxics (OPPT), Environmental Protection Agency, 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001.
- *Hand Delivery:* To make special arrangements for hand delivery or delivery of boxed information, please follow the instructions at <http://www.epa.gov/dockets/contacts.html>.

The Facilitators will take notes on comments made by members of the public during Committee Meetings and include them in Meeting Notes. EPA will receive and compile comments received in writing from members of the public and share them with Committee Members prior to or at Committee Meetings.

### 3. EXPECTATIONS OF COMMITTEE MEMBERS

#### 3.1. Expectations of Individual Committee Members

- **Engage in respectful and good faith negotiations and discussions.** Committee Members will commit to civilly work together to develop mutually acceptable recommendations for a proposed rule as it relates to inorganic byproducts. See 3.2 - Meeting Guidelines.
- **Stakeholder organizations (see Appendix A) with more than one Committee Member will speak with one voice.** If an agreement cannot be reached between two Committee Members representing an organization, they will both stand aside from decision-making and not block an agreement on which all other Committee Members concur.
- **Regularly prepare for and attend Committee Meetings.** Effective consensus decision making requires consistent attendance. Members will attend as many meetings as possible, and let the Facilitators know if they are not able to participate. In the event that at least one Committee Member from a designated stakeholder organization cannot attend a Committee Meeting, the organization may designate another person to attend as an observer who can provide input during the public comment period and report back to the Committee Member(s) on the work of the Committee at the meeting.
- **Represent the interests of their constituent group.** Members will inform their constituents about issues under discussion and solicit their input as needed or appropriate.
- **Agree to support and abide by the content of this Operating Protocol.**

#### 3.2. Meeting Guidelines

To engage in productive deliberations, Committee Members and Working Group Members agree to follow the following Meeting Guidelines:

- Seek to develop a clear and common understanding of the scope of the regulatory negotiations and clarify what can and cannot be changed regarding CDR reporting in relationship to broader CDR requirements and the legal authority of TSCA Section 8(a).
- Pay attention to speakers and issues being discussed in the meeting, and avoid side conversations.
- Use table tents to indicate a request to be recognized and speak. Facilitators will observe and recognize Committee Member's requests to speak.
- Be brief and speak to the point.
- Allow people to speak and refrain from interrupting.
- Feel free to ask questions to clarify understanding and accept that all questions are acceptable to ask. Facilitators will allow questions to be asked and answered.
- Use terminology that others understand. If technical terminology or acronyms are used, explanations on their meaning should be provided.
- Avoid judging ideas prematurely and remain open-minded.
- Look for the needs or interests underlying a concern or idea.
- Look for ways to improve proposals.
- Take time for private meetings to discuss ideas raised in the Committee with members of their stakeholder category, organization or constituents attending meetings, and other Committee Members with similar interests. Facilitators, at the request of Committee Members, will help schedule times between and if needed during Committee Meetings to accommodate these meetings.
- Utilize straw-polls, as appropriate, to assess views of Committee Members to guide on-going or future Committee discussions.

Some disagreements are inevitable, but they should be focused on the issues involved rather than the people holding a particular view.

### **3.3. Facilitators**

Facilitators from CDR Associates (Collaborative Decision Resources Associates) and the Consensus Building Institute will serve as independent process designers and Facilitators of meetings at the pleasure of the collective membership of the Committee.

While the Facilitators are contractors to EPA, they are accountable to the Committee as a whole and not to any one Committee Member or stakeholder organization.

The Facilitators will remain impartial toward the substance of the issues under discussion, and "multipartial" toward all parties. They will work with all Committee Members to help identify and/or develop mutually acceptable solutions to issues that meet all parties' interests to the greatest extent possible.

In collaboration with members of the Process Workgroup, the Facilitators will design meeting agendas for Committee and Workgroup meetings and strategies to address issues identified for discussion. At a minimum, the Facilitators will:

- Provide Committee Members with meeting summaries within 10 days of the conclusion of each Committee Meeting.
- Strive to provide Committee Members with a draft agenda 10 days prior to the next scheduled Committee Meeting, so that Members have an opportunity to consult with other members of their stakeholder organizations or constituents.
- Encourage Committee Members to provide relevant information about issues identified in the previous Committee Meeting for future deliberations at least one week in advance of each meeting.

The Facilitators will assist Committee Members to follow Meeting Guidelines approved by the Committee.

Facilitators will help Committee Members determine appropriate ways to respond to impasses and summarize information on the diversity of Members views.

The Facilitators will develop meeting summaries, distribute them to Committee Members, integrate feedback and provide ongoing meeting coordination and support. Meeting summaries will be reviewed and approved at each Committee Meeting. The Facilitators will distribute to all Committee Members any information that a Committee Member requests be shared that is relevant to Committee deliberations.

The Facilitators will assist Committee Members reach and record consensus agreements. They will summarize discussions throughout and at the end of each day of meetings, use straw polls to check for consensus and identify potential agreements as quickly as possible, respecting the need for further reflection and/or later consultations with stakeholders not on the Committee.

The Facilitators will draft a Final Committee Report detailing the deliberations of the Committee and its outcomes. The Final Report will be prepared regardless of whether any agreements are reached and will include content requested by Committee Members. The Final Committee Report will be circulated among Committee Members for review, comment and concurrence on language used to describe the outcome of the Committee’s deliberations.

### **3.4. Schedule**

The Committee is scheduled to meet beginning in June 2017 for up to five meetings occurring every month to month-and-a-half. Meetings will be approximately one-and-a half days in length. The Committee is projected to complete its work by November 2017, or earlier, when it will make proposed recommendations to EPA. If necessary, the Committee and EPA may change this schedule.

## **4. HOW THE COMMITTEE WILL MAKE DECISIONS**

### **4.1. Definition of Consensus**

Decisions in this regulatory negotiation will be made by consensus. The NRA defines consensus as “unanimous concurrence among the interests represented on a negotiated rulemaking committee established under this subchapter, unless such committee (A) agrees to define such term to mean a general but not unanimous concurrence; or (B) agrees upon another specified definition.” (Negotiated Rulemaking Act (United States Code, Title 5, Government Organization and Employees, Part I - The

Agencies Generally, Chapter 5 - Administrative Procedure, Subchapter III - Negotiated Rulemaking Procedure, § 562. Definitions (2).

A consensus will be considered to have been reached on an individual, cluster or total package of issues when either a Facilitator or Committee Member recognizes or makes a proposal for an agreement that all Committee Members verbally indicate concurrence, or, at a minimum, agree not to actively oppose. While agreement on a specific issue, cluster or package of issues may not always be the first choice of every Committee Member, during the decision-making process each of them will have had an opportunity to express their views, be heard and participate in developing an agreement that all members can “live with”.

#### **4.2. The Consensus Decision-Making Process**

Reaching a consensus requires all group members to educate each other about their important concerns and interests and develop integrative solutions that address and satisfy their individual and stakeholder organization’s interests to the greatest extent possible, without compromising any strong convictions or principles.

To enhance creativity during meetings, Committee Members are expected to remain open to new options or solutions to issues being addressed that may emerge during negotiations and deliberations. The goals of the Committee and Workgroup(s) are to have frank and open discussions of the issues in question and develop creative options to address them. Ideas raised in the process of negotiations and prior to development of final recommendations to the EPA will be considered “for discussion purposes only”, and will not be construed to reflect the final conclusion of a Committee Member or his or her or constituent group.

The Committee may reach consensus agreements and make recommendations on all issues raised and discussed in the regulatory negotiation, or only some of them. The Committee does not have to reach a consensus on all issues raised and discussed in the negotiations for EPA to include recommendations reached on more limited issues into a proposed rule.

Following the provisions of the Negotiated Rulemaking Act (f) Report of Committee, “If a committee reaches a consensus on a proposed rule, at the conclusion of negotiations the committee shall transmit to the agency that established the committee a report containing the proposed rule.”

#### **4.3. When Consensus cannot be reached on Final Recommendations**

A Committee Member or multiple members may oppose a proposal for agreement and block consensus if the matter in question is of significant importance to them. Blocking, however, should not be initiated lightly. It should only be initiated if:

- The proposed option or agreement violates a legally established law, regulation or rule;
- A serious matter of principle is involved;
- An integrative solution that addresses all parties’ concerns and interests cannot be developed or discovered;
- A stakeholder organization believes it has a viable Best Alternative to a Negotiated Agreement (BATNA) outside of the negotiated rulemaking that will better meet their interests.

Following the provisions of the Negotiated Rulemaking Act (f) Report of Committee, “If the committee does not reach a consensus on a proposed rule, the committee may transmit to the agency a report specifying any areas in which the committee reached a consensus. The committee may include in a report any other information, recommendations, or materials that the committee considers appropriate. Any committee member may include as an addendum to the report additional information, recommendations, or materials.”

## **5. COMMUNICATION PROTOCOL**

### **5.1. Communications among Committee Members**

Substantive Committee discussions should be limited to official Committee Meetings, so that members of the public can observe, provide input, ask questions, and receive answers from the Committee Members. Substantive Committee discussions include email or telephone conversations. When communicating via email, Committee Members should not reply to the entire Committee, but instead respond directly to the sender. In the event that an email or telephone communication occurs between two or more Committee Members, the communication should be limited to less than a quorum of the committee (i.e., 50% of the Committee Membership plus one), which cannot make consensus decisions on behalf of the entire committee.

### **5.1. Communications between and among Committee Members**

Decisions on substantive issues will be made only at official Committee Meetings, which are open to the public. Committee Members participating in private meetings, phone calls or e-mails to prepare to discuss issues of concern at subsequent Committee Meeting do not have authority to make any substantive decisions for the Committee as a whole. Issues discussed in private that Committee Members want to have considered by the Committee must be brought back to an official Committee Meeting for discussion and for any decisions to be made.

Committee Members when communicating privately by e-mail or by phone will not contact or engage in communications with the entire Committee. If Committee Members have an issue or concern they want to communicate to the Committee as a whole outside of an official public meeting, they will send it to the Facilitators to decide how it should be shared.

The above communication conventions will help guarantee a transparent regulatory negotiation and enable members of the public to observe, provide input, ask questions, and receive answers from Committee Members.

### **5.2 Communications with Committee Members’ Constituents and the General Public**

Committee records, including documents utilized and meeting summaries, will be available to Committee Members’ constituents and the general public. They will be posted on a web site managed by EPA: <https://www.epa.gov/chemical-data-reporting/negotiated-rulemaking-committee-chemical-data-reporting-requirements>.

In communicating with the general public and media, a clear distinction should be made between preliminary information, concept papers or proposals under consideration and final decisions on recommendations. It is important to differentiate between documents used for discussions and

decisions. Preliminary documents will be marked with “DRAFT” or “FOR DISCUSSION PURPOSES ONLY.”

### **5.3 Communications with the Media**

Work sessions of the Committee and Workgroups will be open to the media. Committee Members, however, should not use the Committee’s deliberations as a platform for lobbying the public through the media.

Each Committee or Workgroup Member is free to speak with the press and express his or her views on behalf of the agency or organization he or she represents. No Committee or Workgroup Member will characterize to the press the point of view of other Committee Members.

When speaking to the press, each Committee or Workgroup member will be clear that he or she is not speaking for the Committee and that his or her comments do not represent the Committee’s point of view.

No comment to the press from an individual Committee Member should be attributed to the Committee as a whole. No Committee Member will formally speak for or represent the Committee without express authorization by consensus of the Committee as a whole.

If the Committee as a whole or the Process Workgroup determines that there is a need to communicate formally with the press, they will designate a spokesperson(s) and/or draft a statement or press release. Committee Members can refer members of the press to the Designated Federal Official for questions about the process.

## APPENDIX A:

### Stakeholder Organizations and Committee Members participating in the Negotiated Rulemaking on Limiting Chemical Data Reporting (CDR) Requirements As of 5/26/17

#### *EPA*

- Lynn Vendinello, Deputy Director, Chemical Control Division, Office of Pollution Prevention and Toxics
- Susan Sharkey, Existing Chemicals Branch, Chemical Control Division, Office of Pollution Prevention and Toxics

#### *States (considered separate stakeholder organizations)*

#### **Massachusetts Department of Environmental Protection and Environmental Council of the States (ECOS)**

- Mark Smith, Director, Office of Research and Standards, Massachusetts Department of Environmental Protection

#### **Minnesota Pollution Control Agency and ECOS**

- John Gilkeson, Resource Management and Assistance Division, Minnesota Pollution Control Agency

#### *Tribes*

#### **National Tribal Toxic Council**

- Kristin K'eit, Senior Environmental Scientist, Zender Environmental Health and Research Group

#### *Environmental/ Public Interest Organizations*

#### **Earthworks**

- Aaron Mintzes, Policy Advocate, Earthworks
- Lauren Pagel, Policy Director, Earthworks

#### **National Pollution Prevention Roundtable (NPPR)**

- Rick Reibstein, Board Member, National Pollution Prevention Roundtable

#### **Natural Resources Defense Council (NRDC)**

- David Lennett, Senior Attorney, NRDC

#### **Sierra Club and CA Communities Against Toxic**

- Amy Kyle, Adjunct Professor Retired, UC Berkeley School of Public Health and designated representative

#### **WE ACT for Environmental Justice**

- Dr. Adrienne L. Hollis, Esq., Director of Federal Policy, WE ACT for Environmental Justice

#### *Manufacturing and Recycling Industry Associations and Companies*

#### **American Chemistry Council (ACC)**

- Karyn Schmidt, Senior Director, Regulatory & Technical Affairs, ACC

- Schuyler Pulley, Regulatory Specialist, Chemours Company FC, LLC

#### **American Coal Ash Association (ACAA)**

- Rafic Minkara, PhD., PE, Vice President – Research & Development, Headwaters Resources, Inc.
- Danny, L. Gray, P.E., Executive Vice President- Governmental & Environmental Affairs, Charah, Inc.

#### **American Fuel & Petrochemical Manufacturers (AFPM)**

- Jim Cooper, American Fuel & Petrochemical Manufacturers
- David D. Dunlap, Koch Companies Public Sector, LLC

#### **American Petroleum Institute (API)**

- Derek Swick, Manager Regulatory and Scientific Affairs, API
- Uni Blake, Scientific Advisor, API

#### **Association Connecting Electronics Industries (IPC)**

- Fern Abrams, Director Regulatory Affairs, IPC
- Bret Bruhn, Environmental Operations Manager – Oregon, TTM Technologies

#### **Guardian Industries**

- Mark N. Duvall, Principal, Beveridge & Diamond, P.C.
- James Riley, Environmental Program Manager, Guardian Industries Corp.

#### **Institute of Scrap Recycling Industries (ISRI)**

- David Wagger, Chief Scientist and Director of Environmental Management, Institute of Scrap Recycling Industries

#### **International Precious Metals Institute (IPMI)**

- Gus Ruggiero, Group Industrial Hygiene Manager, Johnson Matthey Inc.
- JP Rosso, President, IPMI

#### **North American Metals Council (NAMC)**

- Kathleen M. Roberts, Executive Director, North American Metals Council
- Martin Jones, Senior Counsel, Fremont-McMoRan, Inc.

#### **Phibro-Tech**

- William Dwight Glover. President, Phibro-Tech

#### **Portland Cement Association**

- Michael B. Schon, Vice President & Counsel, Government Affairs, Portland Cement Association
- James S. Willis, III, P.E., P.G., Director Corporate Environmental, Titan America, LLC

#### **Steel Industry – Representing American Iron and Steel Institute, Steel Manufacturers Association, Specialty Steel Industry of North America, and Copper & Brass Fabricators Council**

- Joseph Green, Kelley Drye & Warren LLP

#### **Utility Solid Waste Activities Group**

- Douglas Green, Partner, Venable, LLP
- Jim Roewer, Executive Director, Utility Solid Waste Activities Group