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238 Lobbyists Led the Chemical Industry Campaign Against Strong Laws and Regulations in 2007

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"You know, the threat is just staring us in the face. I mean, all you'd have to do is to have a major chemical facility in a major metropolitan area go up and there'd be hell to pay politically. People will say, 'Well, didn't we know that this existed?' Of course, we knew."

-Former Senator Warren Rudman (R-NH) November, 2003

Since 2002 when the Bush administration scuttled an EPA chemical plant security proposal, Congress has failed to enact comprehensive chemical security legislation. Instead, in the fall of 2006 Congress passed a 740 word interim law as a "rider" on the Department of Homeland Security (DHS) Appropriations bill. The bill was supported by the chemical industry but opposed by Democrats who favored the comprehensive legislation that had been reported out of the House and Senate homeland security Committees. Even though the interim law was enacted with the expectation that Congress would pass permanent legislation before it expires on October 4, 2009, in 2007 the chemical industry lobby urged Congress to hold off on permanent legislation. In addition the industry successfully pressured the DHS to issue weak regulations known as the Chemical Facility Anti-Terrorism Standards (CFATS).

Because the CFATS also asserted the authority to bar states from issuing stronger security standards the new Congress passed legislation to reverse the DHS claim of preemption. This had to be passed twice because it was an amendment to the Iraq war Appropriations bill that President Bush vetoed. It was enacted in December as an amendment to the DHS Appropriations bill.

To understand the breadth and depth of the 2007 chemical industry lobbying campaign against comprehensive permanent legislation and regulations, Greenpeace conducted a survey of the 2007 congressional lobbying records of the chemical industry and allied businesses. **The survey identified 238 industry lobbyists reporting \$130 million of expenditures in 2007.** Using a conservative methodology, Greenpeace estimated that at least \$12.5

million was spent to lobby specifically on chemical plant security legislation and regulations. More than 500 lobby reports were surveyed. A total of 64 separate entities registered to lobby on chemical security legislation. These included: **20 trade associations including the American Chemistry Council (ACC), and the U.S. Chamber of Commerce; 30 individual companies including Dow Chemical Company, DuPont, and ExxonMobil; and 14 lobby firms, including Hogan & Hartson and Holland & Knight.**

Due to the lax reporting requirements of the Lobbying Disclosure Act (LDA), any survey will likely underestimate the total number of lobbyists and money spent to influence federal laws and regulations. This survey identified the 238 lobbyists who specifically registered to lobby on chemical security legislation. Trade associations, individual companies and lobbying firms that reported spending less than \$10,000 were not included in the report.

The data compiled in this report reveals at least three layers of a multi-million dollar campaign to prevent stronger regulations (in this case by making a weak interim law permanent) and to keep customers from switching to safer, more secure products. **Three trade associations dominated this lobby campaign;** the ACC (the trade association of major chemical manufacturers), the National Association of Manufacturers (NAM), and the U.S. Chamber of Commerce, who cumulatively have 127 registered chemical security lobbyists representing 53% of the total 238 lobbyists and an estimated \$8.6 million.

Of the 238 chemical security lobbyists identified, 25 directly represent the ACC and 53 represent ACC member companies (Appendix A) such as Dow and Dupont Co. These 78 lobbyists (33% of the total) cost the ACC and its member companies an estimated \$4.7 million and led the efforts to weaken the current chemical security law and regulations (Chemical Facility Anti-terrorism Standards- CFATS). In an E&ETV¹ interview on March 21, 2007, ACC CEO Jack Gerard said that, "We [the ACC] believe the Department of Homeland Security

should have the ability to put these regs in place. Let's let the dust settle, and then a few years down the road let's take a look at it."

In 2007, NAM fielded 21 lobbyists registered to lobby on chemical security and spent an estimated \$292,758. Also, the U.S. Chamber of Commerce had 28 registered chemical security lobbyists in 2007 and reported the highest spending of all the trade associations, member companies and lobby firms with an estimated \$3.75 million (Appendix C) on chemical security lobbying.

Notably, Greenpeace identified three former members of Congress registered to lobby on chemical security among the lobbying reports of the chemical industry and allied businesses. All three lobbyists worked for firms that directly represented the ACC or one of its member companies in 2007. Former **Representative Tom Coleman** and his firm lobbied for BASF, a member company of the ACC; former **Representative Chris John** worked for Ogilvy Government Relations, a lobby firm hired by the ACC; and former **Senator Ben Campbell** worked for the lobby firm Holland and Knight, also hired by the ACC.

This report also identified a group that fronts for the chemical industry as "retailers." The Agricultural Retailers Association (ARA) had 4 lobbyists registered to work on chemical security, and spent an estimated 25% of their 2007 lobbying budget on this issue. The ARA board of directors includes high level members of the biggest chemical companies: Dow AgroSciences, Monsanto, and Dupont Co².

A prominent example of how this survey most likely underestimates industry efforts to influence chemical security legislation is the absence of registered chemical security lobbyists for the Clorox Company. Although Clorox did not report any direct lobbying on the issue in 2007, it is represented on the NAM board of directors³, and in 2007 formally submitted comments to the DHS on the current interim regulations. Clorox is a major user of chlorine gas in the production of household bleach and stores enormous quantities of chlorine gas

at 9 facilities in the US and Puerto Rico. Of these, 5 facilities are located in densely populated areas and each threatens a million or more people. In contrast to Clorox, a Canadian company, K2Pure, recently developed a safer process to make bleach using no more than 20 pounds of chlorine gas at a time, greatly reducing the risk of a toxic gas release. K2Pure is planning to build several new facilities in the US⁴.

In a break with its industry allies in the NAM, the largest shippers of bulk poison gases produced by companies such as Dow and Dupont are calling for stronger security standards. On February 27, 2008, the Association of American Railroads (AAR) issued a statement in support of the use of safer chemicals as a way to eliminate industry vulnerability to potential terrorist attacks on rail cars carrying hazardous chemicals⁵:

"We can no longer continue to risk the lives of millions of Americans by using, transporting and storing highly toxic chemicals when there are safer alternatives commercially available. It is time for the nation's big chemical companies to stop making the dangerous chemicals that can be replaced by safer substitutes or new technologies currently in the marketplace... **And if they won't do it, Congress should do it for them in the Chemical Facility Anti-Terrorism Act of 2008."**

The current chemical facility security law, which will expire on October 4, 2009, is a 740-word "rider" attached to the 2007 Department of Homeland Security (DHS) appropriations bill that was designed as a place-holder until permanent legislation is enacted. The rider actually prohibits DHS from requiring the use of safer more secure chemicals or technologies. It also exempts approximately 2,850 water facilities from regulations and prohibits lawsuits to enforce the law. Industry lobbying forestalled the passage of permanent legislation in 2007 and unless a bill is passed in 2008, the next Congress will have only 9 months to enact permanent legislation before the interim law expires in 2009.

Since 9/11, the chemical industry lobby, led by the ACC, NAM and the U.S. Chamber of Commerce, has succeeded in delaying the enactment of permanent, comprehensive chemical security legislation. In each Congress since 9/11 they derailed or crippled comprehensive legislation, including a 2002 regulatory proposal by the EPA. However, after unsuccessful efforts to delay, weaken and kill H.R. 5577, the House Homeland Security Committee adopted H.R. 5577 on March 6, 2008. If enacted, this bill would require implementation of safer, cost-effective technologies at high-risk plants and for the first time establish a comprehensive security program for one of the nation's most vulnerable sectors.

The Energy and Commerce Committee has also claimed jurisdiction over chemical security legislation. The Subcommittee on Environment and Hazardous Materials chaired by Representative Albert Wynn (D-MD) is slated to take it up next. On March 5, Wynn introduced his own chemical security bill (H.R. 5533), which would simply make permanent the current interim law. On March 27, Representative Wynn also announced that he is leaving Congress in June to become a partner in the Washington lobbying firm of Dickstein Shapiro, who represented Dupont Co. last year, leaving vacant the chairmanship of the subcommittee⁶. The challenge is now before the Democratic Congress: will the 110th Congress pass comprehensive chemical security legislation this year or continue the neglect of the last seven years?

**Chemical Manufacturers Lobby to Keep Customers from Switching
to Safer and More Secure Alternatives**

ACC member companies such as DuPont and Dow, who manufacture hazardous chemicals such as chlorine gas, oppose stronger regulations especially the use or even consideration of inherently safer technologies (IST). These chemical manufacturers account for only 11% of the universe of chemical facilities registered with the EPA. The remaining 89% are downstream users of chemicals who can often switch to safer alternatives more quickly⁷.

More than 200 plants have converted to safer chemicals or processes since 9/11. One example of a fast and cost effective conversion is Washington D.C.'s Blue Plains Wastewater Treatment Plant. After 9/11 the plant converted from chlorine gas to liquid bleach in 90 days. This eliminated a catastrophic risk to 1.7 million people and added only about 25 cents per month to the average customer's utility bill⁸.

According to a March 2008 Congressional Research Service (CRS) report (attached) based on EPA data, there are 7,298 chemical facilities in the US that reported worst-case off-site consequences (OSCs) affecting 1,000 or more people⁹. Of these, the DHS says 3,400 – 4,400 plants pose the greatest hazard to human life and health in the event of an accident or terrorist attack¹⁰. Based on facility reports submitted to the EPA, four chemicals: chlorine gas, sulfur dioxide, anhydrous ammonia and hydrogen fluoride account for 55% of the off-site risks posed by these facilities. Fortunately, safer alternatives exist for all four of these chemicals, which could potentially eliminate the majority of the risks.

In a 2006 survey by the Center for American Progress⁸ of 284 chemical facilities that converted to safer technologies since 1999, 195 plants provided information on the cost of their conversions:

49% of the plants spent less than \$100,000

38% of the plants spent between \$100,000 and \$1 million

34% of the plants expected to save money.¹⁰

However, at this rate it will take seventy-seven years to convert the 3,400 plants that DHS says pose a threat to 1,000 or more people. A permanent law, that requires the use of safer technologies at high-risk plants is the best way to ensure the conversion of dangerous facilities in a timely manner.

Methodology

The initial survey was based on official letters, web site postings and official comments of 20 trade associations such as the American Chemistry Council (ACC), American Petroleum Institute (API), National Association of Manufacturers and U.S. Chamber of Commerce. Lobby reports were included that listed one of the following: Department of Homeland Security Appropriations Act, 2008, H.R. 5695, H.R. 1530, Chemical Facility Security Improvement Act of 2007, CFATS, and the committee print of H.R. 5577.

By identifying the member companies and affiliates of each trade association, investigators searched more than 500 lobby records for lobbyists registered to work on the chemical security legislation and regulations of 2007. The reports of registered lobbyists were gathered from two congressional web sites:

Senate Office of Public Records¹³ web-site, <http://sopr.senate.gov>

House of Representatives Office of the Clerk¹⁴ web-site,
<http://ldsearch.house.gov>.

Three layers of lobbying were searched: trade association lobbyists, affiliated company lobbyists and the lobby firms hired by both of these groups. This data was compiled from both the mid-year and year-end 2007 lobbying disclosure reports.

The lobbyists identified in this report include 20 trade associations, 32 corporations and 14 lobby firms. The total number of individual industry lobbyists reporting work on chemical security totaled 238 lobbyists for 2007.

The Lobby Disclosure Act (LDA) of 1995 fails to require any specific information on the amount of money spent on a single issue or piece of legislation. Instead the reports give an aggregate total of expenditures for a six-month period for all issues. The LDA also has a narrow definition of lobbying and does not include the full breadth of money spent by a company or association to influence public opinion and ultimately public policy and legislation. Therefore it is impossible, based on the LDA reports alone, to determine the exact amount of money or priority given to any single piece of legislation or issue at any given time.

Given these limitations, we used a conservative method that almost certainly underestimates total spending to influence chemical security legislation. For example, the ACC, the main lobbying arm of the chemical industry, has prioritized chemical security since 9/11. Their annual budget for 2007 was \$75 million.

However, in their 2007 lobbying reports, the ACC itself reported spending only \$2.3 million on all lobbying. The ACC also hired three lobby firms that brought their total reported lobbying to \$3 million for 2007. But this does not count the cumulative lobbying resources of the ACC and its member companies, which

was reported to be \$59 million. Given these large lobbying budgets, the priority given to chemical security last year and that the average industry lobbyist salary in Washington D.C. is somewhere between \$100,000 and \$300,000¹, our estimate of the ACC's chemical security lobbying expenditure of \$508,269 is likely a significant underestimate of what was actually spent. It is also likely that the estimated cumulative chemical security lobbying expenditures of the ACC and its member companies of \$4.6 million out of a \$59 million lobbying budget is an underestimate.

Estimating Chemical Security Lobbying

Since the lobbying reports do not disclose the priority of any particular issue, we calculated the amount of money spent by the number of issues worked on by individual lobbyists.

To estimate chemical security lobbying by individual lobbyist we took the following steps:

1. Counted the total number of lobbyists who worked for each trade association, corporation or lobby firm and out of those how many worked on the issue
2. Counted the total number of issues each chemical security lobbyist worked on in 2007
3. Summed the spending by the association or corporation (or income generated in the case of the individual lobby firms) in 2007
4. Divided the total spending by the total number of lobbyists (not just chemical security lobbyists)

This number gave us the theoretical amount of money spent by the company per lobbyist

5. We then broke this number down further by dividing it by the number of issues worked on by the individual chemical security lobbyist to get the theoretical amount of money devoted to chemical security lobbying

Example Calculation for the ACC:			
1. The ACC had 10 in-house lobbyists in 2007, 5 of whom reported working on chemical security			
2. The ACC reported spending a total of \$2.39 million on lobbying in 2007			
\$2.39 million / 10 lobbyists = \$239,000 / lobbyist			
2. As an example, one lobbyist, Jack Gerard, reported working on 5 issues in 2007, 1 of which included chemical security legislation. Thus,			
\$239,000 / 5 issues = \$47,800 per issue			
3. Since Jack reported working on 1 chemical security issue, we multiply his per issue spending by 1 issue			
\$47,800 X 1 = \$47,800 spent on chemical security			
This calculation was performed for all 5 lobbyists who registered on chemical security			
Lobbyist	Total Issues	Chem. Sec. Issues	Estimated \$ per Lobbyist
Jack Gerard	5	1	\$47,800
Tom Gibson	5	1	\$47,800
James W. Conrad Jr.	3	1	\$79,666.67
Martin Durbin	5	1	\$47,800
Brent Perry	5	1	\$47,800
		Total	\$270,867.67
5. The amount spent on chemical security by each lobbyist was totaled			
Thus, in our estimation, the ACC spent \$270,867 lobbying Congress on chemical security in 2007.			

This calculation was repeated for each industry association, chemical company and individual lobbying firm that reported lobbying activity on chemical security regulations in 2007.

Summary of Results

Table 1.1 – Total Number of Registered Lobbyists Working on Chemical Security, and the Estimated Total Amount of Money Spent on Chemical Security Lobbying for 2007, Broken Down by Trade Association, Company and Lobby Firm.

	Trade Associations (20)	Companies (30)	Lobby Firms (14)	Total
Total # Lobbyists	269	193	_____*	462
Chemical Security Lobbyists	133	106	_____*	238**
% Chemical Security Lobbyists	50.6%	54.9%	_____*	52.2%
Mid Year Spending	\$24,100,000	\$31,482,453	\$1,730,000	\$57,312,453
Year End Spending	\$33,680,000	\$38,243,532	\$1,390,000	\$73,313,532
Total for all Lobbying	\$57,780,000	\$69,725,985	\$3,120,000	\$130,625,985
Total Available for Chemical Security Lobbying	\$5,991,984	\$5,123,583	\$1,387,336	\$12,502,903

* The registered chemical security lobbyists for individual lobby firms were included in the total number of lobbyists for the specific trade association or chemical company they were hired by.

**238 individual lobbyists were found, however one lobbyist, Bob Moss, worked for both a trade association (ACC) and a company (FMC Corp), thus the total number of individual lobbyists is 238, and not the sum total of 239.

Appendix A

ACC Lobby Firms
and Member Companies

Firms and Companies	Number of Chem-Security Lobbyists	Estimated Chem-Security Spending	Total Spending
American Chemistry Council	5	\$270,867	\$2,390,000
ACC via Bob Moss Associates*	1	\$110,000	\$110,000
ACC via Holland and Knight	12	67,402	\$320,000
ACC via Ogilvy Government Relations	7	\$60,000	\$180,000
Arch Chemicals via Alpine Group	2	\$120,000	\$160,000
Ashland	2	\$151,071	\$470,000
BASF Corp	6	\$225,396	\$1,034,985
BASF Corp via Tom Coleman and Associates	1	\$120,000	\$300,000
Bayer	2	\$300,215	\$3,705,000
Celanese	1	\$40,000	\$200,000
CIBA Corp	2	\$116,667	\$560,000
Dow Chemical Company	2	\$285,883	\$3,430,000
Dupont Co.	7	\$1,083,375	\$3,240,000
Exxon Mobil	1	\$162,884	\$16,940,000
FMC Corp	1	\$225,731	\$1,570,000
FMC Corp via Bob Moss Associates*	1	\$60,000	\$60,000
Honeywell	7	\$263,179	\$4,940,000
Huntsman	2	\$56,110	\$575,000
Lanxess	1	\$40,000	\$40,000
Marathon Oil Company	2	\$167,499	\$5,690,000
Monsanto	5	\$164,285	\$4,500,000
Occidental Intl Group	1	\$38,888	\$2,640,000
PPG Industries	1	\$56,875	\$700,000
Praxair	1	\$166,666	\$1,100,000
Rohm and Hass	1	\$168,333	\$840,000
Shell Oil Co.	4	\$49,283	\$2,760,000
Sunoco	1	\$112,000	\$560,000
Total	78*	\$4,682,609	\$59,014,985

*Bob Moss Associates represented both the ACC and FMC Corp. thus the total number of individual lobbyists is 78 and not the sum total of 79 lobbyists.

Appendix B

Summary of Reported Chemical Security Lobbying

Associations and Companies	Number of Chem-Security Lobbyists	Estimated Chem-Security Spending
Agricultural Retailers Association	4	\$35,000
Air Products & Chemicals Richard Goodstein	1	\$32,000
American Chemistry Council	5	\$270,867
American Chemistry Council Bob Moss	1	\$110,000
American Chemistry Council Holland & Knight	12	\$67,402
American Chemistry Council Ogilvy Gov't	7	\$60,000
American Forest & Paper Assn.	3	\$86,827
American Frozen Food Institute	6	\$40,000
American Frozen Food Institute Hogan & Hartson	1	\$20,000
American Petroleum Institute	4	\$169,597
American Public Works Assn.	4	\$57,777
Arch Chemicals Alpine Group	2	\$120,000
Arkema	1	\$3,949
Ashland Inc.	2	\$151,071
Association of California Water Agencies	3	\$31,666
BASF Corporation	6	\$225,396
BASF Tom Coleman	1	\$120,000
Bayer	2	\$300,215
Celanese	1	\$40,000
CF Industries, Inc.	1	\$92,000
CIBA Corp	2	\$116,667
Consumer Specialty Products	1	\$25,000
Coors Brewing Company	1	\$48,541
Corn Refiners Association	1	\$7,000
Croplife America	4	\$200,000
Dow AgroSciences	1	\$126,666
Dow Chemical Company	2	\$285,833
Dupont Co.	7	\$1,083,375
Exxon Mobil	1	\$162,884
FMC Corporation	1	\$225,731
FMC Corporation Bob Moss	1	\$60,000
Halliburton	2	\$26,547
Honeywell	7	\$263,179
Huntsman Corporation	2	\$56,110
International Dairy Foods Assn.	3	\$73,500
International Paper	4	\$128,776
Koch Industries	4	\$258,857
Koch Industries Pyle Consulting	3	\$5,714
Koch Industries Rhoads Group	1	\$19,999
Koch Industries Siff & Lake	1	\$5,555
Lanxess Corporation	1	\$40,000
Lyondell Chemical	2	\$271,333
Marathon Oil Company	2	\$167,499
Monsanto	5	\$164,285
National Assoc. of Manufacturers	21	\$292,758

Appendix B

National Association of Chem distributors	1	\$18,000
National Association of Water Companies	4	\$80,000
National Association of Wheat Growers	4	\$10,262
National Council of Farm Co-Ops	2	\$34,469
National Mining Association	6	\$275,491
National Petrochemical & Refiners	5	\$199,518
National Propane Gas Association	5	\$178,095
Occidental Intl Group	1	\$38,888
OGE Energy Corporation Williams & Jensen	1	\$240,000
PPG Industries	1	\$56,875
Praxair	1	\$166,666
Rohm & Haas	1	\$168,333
RPM International CJR Group	3	\$36,666
RPM International Nelson, Mullins	2	\$60,000
Shell Oil Co.	4	\$49,283
SQM North America C&M Capitolink	1	\$10,000
Sunoco	1	\$112,000
Synthetic Organic Chem. Manufacturers Assoc	5	\$51,552
Tesoro Corporation	1	\$35,428
U.S. Chamber of Commerce	28	\$3,750,829
Valero Energy Corporation	2	\$74,000
Vulcan Materials Hogan & Hartson	10	\$540,000
Weyerhaeuser	4	\$166,972
68 Separate Disclosures	238	\$12,502,903

Appendix C

Summary of Lobbying by Money Spent

Associations and Companies	Number of Chem-Security Lobbyists	Estimated Chem-Security Spending
U.S. Chamber of Commerce	28	\$3,750,829
Dupont Co.	7	\$1,083,375
Vulcan Materials Hogan & Hartson	10	\$540,000
Bayer	2	\$300,215
National Assoc. of Manufacturers	21	\$292,758
Dow Chemical Company	2	\$285,833
National Mining Association	6	\$275,491
Lyondell Chemical	2	\$271,333
American Chemistry Council	5	\$270,867
Honeywell	7	\$263,179
Koch Industries	4	\$258,857
OGE Energy Corporation Williams & Jensen	1	\$240,000
FMC Corporation	1	\$225,731
BASF Corporation	6	\$225,396
Croplife America	4	\$200,000
National Petrochemical & Refiners	5	\$199,518
National Propane Gas Association	5	\$178,095
American Petroleum Institute	4	\$169,597
Rohm & Haas	1	\$168,333
Marathon Oil Company	2	\$167,499
Weyerhaeuser	4	\$166,972
Praxair	1	\$166,666
Monsanto	5	\$164,285
Exxon Mobil	1	\$162,884
Ashland Inc.	2	\$151,071
International Paper	4	\$128,776
Dow AgroSciences	1	\$126,666
Arch Chemicals Alpine Group	2	\$120,000
BASF Tom Coleman	1	\$120,000
CIBA Corp	2	\$116,667
Sunoco	1	\$112,000
American Chemistry Council Bob Moss	1	\$110,000
CF Industries, Inc.	1	\$92,000
American Forest & Paper Assn.	3	\$86,827
National Association of Water Companies	4	\$80,000
Valero Energy Corporation	2	\$74,000
Internation Dairy Foods Assn.	3	\$73,500
American Chemistry Council Holland & Knight	12	\$67,402
American Chemisty Council Ogilvy Gov't	7	\$60,000
FMC Corporation Bob Moss	1	\$60,000
RPM International Nelson, Mullins	2	\$60,000
American Public Works Assn.	4	\$57,777
PPG Industries	1	\$56,875
Huntsman Corporation	2	\$56,110
Synthetic Organic Chemicals Manufacturers Assoc	5	\$51,552

Appendix C

Shell Oil Co.	4	\$49,283
Coors Brewing Company	1	\$48,541
American Frozen Food Institute	6	\$40,000
Celanese	1	\$40,000
Lanxess Corporation	1	\$40,000
Occidental Intl Group	1	\$38,888
RPM International CJR Group	3	\$36,666
Tesoro Corporation	1	\$35,428
Agricultural Retailers Association	4	\$35,000
National Council of Farm Co-Ops	2	\$34,469
Air Products & Chemicals Richard Goodstein	1	\$32,000
Association of California Water Agencies	3	\$31,666
Halliburton	2	\$26,547
Consumer Specialty Products	1	\$25,000
American Frozen Food Institute Hogan & Hartson	1	\$20,000
Koch Industries Rhoads Group	1	\$19,999
National Association of Chem distributors	1	\$18,000
National Association of Wheat Growers	4	\$10,262
SQM North America C&M Capitolink	1	\$10,000
Corn Refiners Association	1	\$7,000
Koch Industries Pyle Consulting	3	\$5,714
Koch Industries Siff & Lake	1	\$5,555
Arkema	1	\$3,949
68 Separate Disclosures	238	\$12,502,903

Appendix D

Registered Chemical Security Lobbyists

Lobbyist

Acker, Andrew
Acker, Joe
Adair, Julie
Allmond, William
Anastasio, Julia
Anderson, Brenda
Atkins, Caroline
Avery, Kevin
Baker, George
Barnett, Charles
Bassett, Jason
Beauchesne, Ann
Bell, Michael
Beram, Philip C.
Berlinghof, Erika
Bero, James
Bohn, Earl
Boykin, Celeste
Braddock, Chris
Bradner, Robert
Brendle, Bryan
Bridgeford, Tawny
Brock, Heidi
Brown, Shari
Brown, Stephen
Bultena, Lance
Buscher, John
Calderera, Mike
Caravelli, Margaret
Caudill, Brian
Chapman, Colin
Childs, Susan
Cicccone, Christine
Clark, Cade
Clark, Jack
Coffey, Adrian
Coleman, Dorothy
Coleman, Thomas
Conley, Jason
Conrad Jr., James W.
Cook, Peter
Cooper, James
Coppock, Darren
Coratolo, Giovanni
Crawford, Richard
Cutler, Lynn
Dammann, Julie
Darnell, Lucas
Daulby, Jennifer
Dawson, Laurel

Association or Company

National Assoc. of Manufacturers
Synthetic Organic Chemicals Manufacturers Assoc
American Chemistry Council Holland & Knight
Synthetic Organic Chemicals Manufacturers Assoc
American Public Works Assn.
Ashland Inc.
American Petroleum Institute
Marathon Oil Company
OGE Energy Corporation Williams & Jensen
Arch Chemicals Alpine Group
American Frozen Food Institute
U.S. Chamber of Commerce
Vulcan Materials Hogan & Hartson
U.S. Chamber of Commerce
National Association of Water Companies
BASF Corporation
Lanxess Corporation
Dupont Co.
U.S. Chamber of Commerce
American Chemistry Council Holland & Knight
National Assoc. of Manufacturers
National Mining Association
Weyerhaeuser
Weyerhaeuser
Tesoro Corporation
Vulcan Materials Hogan & Hartson
American Chemistry Council Holland & Knight
National Propane Gas Association
National Petrochemical & Refiners
National Propane Gas Association
Koch Industries Rhoads Group
Shell Oil Co.
Honeywell
National Association of Water Companies
U.S. Chamber of Commerce
Association of California Water Agencies
National Assoc. of Manufacturers
BASF Tom Coleman
U.S. Chamber of Commerce
American Chemistry Council
National Association of Water Companies
Synthetic Organic Chemicals Manufacturers Assoc
National Association of Wheat Growers
U.S. Chamber of Commerce
Coors Brewing Company
American Chemistry Council Holland & Knight
American Chemisty Council Ogilvy Gov't
American Frozen Food Institute
Monsanto
RPM International CJR Group

Appendix D

De Roco-Cupit, Teresa	National Assoc. of Manufacturers
Deline, Donald	Halliburton
Deming, John L.	CIBA Corp
Detlefsen, Clay	International Dairy Foods Assn.
Donohue, Thomas J.	U.S. Chamber of Commerce
Drevna, Charlie	National Petrochemical & Refiners
Duggan, Juanita	American Forest & Paper Assn.
Durbin, Martin	American Chemistry Council
Dykes, Michael	Monsanto
Eberspacher, Jack	Agricultural Retailers Association
Eggers, Matthew	U.S. Chamber of Commerce
Eidshaug, Ronald	U.S. Chamber of Commerce
Engler, John	National Assoc. of Manufacturers
Erdel, Grant	Monsanto
Fahey, James	American Public Works Assn.
Felner, Craig	Valero Energy Corporation
Ferrara, Gerald	Celanese
Fluharty, John	Huntsman Corporation
Friedl, Janet	U.S. Chamber of Commerce
Friedman, David	National Petrochemical & Refiners
Furst, Kenneth	BASF Corporation
Gaede, Mark	National Association of Wheat Growers
Galano, Michael	American Chemistry Council Holland & Knight
Garfield, Robert	American Frozen Food Institute
Gerard, Jack	American Chemistry Council
Gerkin, Daniel	National Mining Association
Gibson, Jennifer	National Association of Chem distributors
Gibson, Tom	American Chemistry Council
Gilliland, Michael	Vulcan Materials Hogan & Hartson
Gold, Richard	American Chemistry Council Holland & Knight
Goldberg, Steven	BASF Corporation
Goldman, Jason	U.S. Chamber of Commerce
Goodstein, Richard	Air Products & Chemicals
Green, John	American Chemistry Council Ogilvy Gov't
Greenwood, Allen	Croplife America
Greenwood, James	Valero Energy Corporation
Griffin, Brian	Honeywell
Gunnulfsen, Jeff	Synthetic Organic Chemicals Manufacturers Assoc
Gupton, Richard	Agricultural Retailers Association
Haggett, Katherine	Koch Industries
Harman, Donna	American Forest & Paper Assn.
Harmon, Kyle	American Petroleum Institute
Harris, Caroline	U.S. Chamber of Commerce
Hassett, James "Jace"	Occidental Intl Group
Hawes, Rebecca	Koch Industries
Hayden, Lou	American Petroleum Institute
Heilman, Joel	Lyondell Chemical
Henneberry, Brian	Koch Industries
Hinch, Phillips	U.S. Chamber of Commerce
Hlobik, Maggie	National Mining Association
House, Michael	Vulcan Materials Hogan & Hartson
Howell, Andrea	Weyerhaeuser

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Hurwitz, Geoffrey	Rohm & Haas
Jenny, Louis	National Association of Water Companies
Jensen, Daniel	American Public Works Assn.
Jessup, Meredith	National Assoc. of Manufacturers
John, Chris	American Chemistry Council Ogilvy Gov't
Josten, Bruce R.	U.S. Chamber of Commerce
Joyner, Christopher	American Petroleum Institute
Kast, Lawrence	Honeywell
Keating, Timothy	Honeywell
King, Peter	American Public Works Assn.
King, Valerie	Praxair
Kitchen, Charles	Arkema
Klippenstein, Jackie	National Council of Farm Co-Ops
Knoll, Albert	Sunoco
Koch, Karl	American Chemistry Council Holland & Knight
Kolassa, Meghan	Agricultural Retailers Association
Kountz, Dennis	Dupont Co.
Kovacs, William	U.S. Chamber of Commerce
Kurkul, Doug	National Assoc. of Manufacturers
Kushner, Gary Jay	American Frozen Food Institute Hogan & Hartson
Kyle, Robert	Vulcan Materials Hogan & Hartson
Lawler, Sharee	Dupont Co.
Lawson, Peter	U.S. Chamber of Commerce
Lehman, Kathryn	American Chemistry Council Holland & Knight
Livoti, Vincent	CIBA Corp
Lomax, Steven	Corn Refiners Association
Long, Patty	National Assoc. of Manufacturers
Lopez, Michelle	U.S. Chamber of Commerce
Lugbill, Tim	National Assoc. of Manufacturers
Lundberg, Rolf	U.S. Chamber of Commerce
Lundquist, Brooke	Dow Chemical Company
Mairena, Mario	Consumer Specialty Products
Malnak, Brian	Shell Oil Co.
Maloney, Drew	American Chemistry Council Ogilvy Gov't
Manes, Julie	Dupont Co.
Maney, Timothy	U.S. Chamber of Commerce
Mang, Jeff	Vulcan Materials Hogan & Hartson
Mark, Elizabeth	U.S. Chamber of Commerce
Martinez, Jorge	American Frozen Food Institute
Massie, James	Arch Chemicals Alpine Group
McBride, Maurice	National Petrochemical & Refiners
McCoy, Ketih	National Assoc. of Manufacturers
McMahon, Kevin	RPM International Nelson, Mullins
Mechum, Sarah	Synthetic Organic Chemicals Manufacturers Assoc
Mellor, Gwen	Vulcan Materials Hogan & Hartson
Mercado, Moses	American Chemistry Council Ogilvy Gov't
Merida, Chris	U.S. Chamber of Commerce
Meroney, Mike	Huntsman Corporation
Meuwissen, Ana	RPM International Nelson, Mullins
Miller, Ashley	U.S. Chamber of Commerce
Miller, Clyde	BASF Corporation
Miller, William	U.S. Chamber of Commerce

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Mitchell, Jo	Exxon Mobil
Modlin, Ryan	National Assoc. of Manufacturers
Moran, Robert	Halliburton
Morse, Nicholas	National Assoc. of Manufacturers
Morton, Barry	National Association of Wheat Growers
Moss, Bob *	ACC Bob Moss & FMC Corp. Bob Moss
Myers, Thomas	U.S. Chamber of Commerce
Neale, Karen	International Paper
Neil, Jim	National Assoc. of Manufacturers
Newhouse, Aric	National Assoc. of Manufacturers
Nighthorse Campbell, Ben	American Chemistry Council Holland & Knight
Noah, Jeff	National Assoc. of Manufacturers
Nolan, Rich	National Mining Association
O'Brien, Rosemary	CF Industries, Inc.
Palmeiri, Rosario	National Assoc. of Manufacturers
Pannozzo, Jeffrey	Dupont Co.
Parr, Michael	Dupont Co.
Parrish, Michael	Monsanto
Pearson Wilcox, Kristin	International Dairy Foods Assn.
Perry, Brent	American Chemistry Council
Pittman, Darren	Croplife America
Pittman, Lee	International Paper
Pouliot, Joe	RPM International CJR Group
Primosch, Bill	National Assoc. of Manufacturers
Prout, Gerald R.	FMC Corporation
Purvis, JD	BASF Corporation
Pyle, Thomas *	Koch Ind: Pyle Consulting & Koch: Rhoads Group
Quarles, Kam	National Council of Farm Co-Ops
Quinn, Harold P.	National Mining Association
Regalia, Martin A.	U.S. Chamber of Commerce
Reimers, Jean D	Bayer
Reynolds, David	Association of California Water Agencies
Rhoads, Barry	Koch Industries Rhoads Group
Rich, James	Shell Oil Co.
Richards, Patricia	Marathon Oil Company
Ries, William	PPG Industries
Roldan, Richard	National Propane Gas Association
Rossman, Elizabeth	Honeywell
Rubin, Josh	RPM International CJR Group
Runyan, John	International Paper
Sajery, Algene	Lyondell Chemical
Sarasin, Leslie	American Frozen Food Institute
Schaeffer, Amy	Weyerhaeuser
Schlapp, Matthew	Koch Industries
Schneider, Abby	Association of California Water Agencies
Schurdt, Bradley S.	Dow AgroSciences
Seimietkowski, Susan	American Frozen Food Institute
Siff, Andrew	Koch Industries Siff & Lake
Signorino, Marc-Anthony	National Assoc. of Manufacturers
Skinner, Jessie	National Petrochemical & Refiners
Slominski, Jerry	International Dairy Foods Assn.
Smith, Keith	National Assoc. of Manufacturers

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Snyder, Rod	Croplife America
Spear, Chris	Honeywell
Spurgat, Jennifer	National Association of Wheat Growers
Squair, Philip	National Propane Gas Association
Stanton, John	Vulcan Materials Hogan & Hartson
Stolpe, Elizabeth	Shell Oil Co.
Strong, Katie	U.S. Chamber of Commerce
Stuntz, Reid	Vulcan Materials Hogan & Hartson
Taylor, Gordon	American Chemistry Council Ogilvy Gov't
Thies, Gregory	BASF Corporation
Thompson, Terrence	U.S. Chamber of Commerce
Thorne, John	SQM North America C&M Capitoline
Thrift, Jim	Agricultural Retailers Association
Timmons, Jay	National Assoc. of Manufacturers
Toohey, Michael J.	Ashland Inc.
Travis, Jim	Monsanto
Troop, Michael	National Propane Gas Association
Van Egmond, Juliane H	Bayer
Vandersari, Elizabeth	American Forest & Paper Assn.
Venable, Nicole	U.S. Chamber of Commerce
Verheggen, Theodore F.	Dow Chemical Company
Viola, Beth	American Chemistry Council Holland & Knight
Vroom, Jay	Croplife America
Warnke, Christine	Vulcan Materials Hogan & Hartson
Watzman, Bruce	National Mining Association
Webb, Clifton R.	Dupont Co.
Wentzel, Renee	American Chemistry Council Holland & Knight
Whitestone, David	American Chemistry Council Holland & Knight
Williams, Jimmy	American Chemistry Council Ogilvy Gov't
Wilson, LeAnn	National Assoc. of Manufacturers
Wroblewski, Ann	International Paper
Zurawski, Paul	Honeywell

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Associations and Members	Registered Lobbying Expenses	Lobbyists Registered On Chemical Security	Estimated Chemical Security Spending
Agricultural Retailers Association Mid Year- \$70,000 Year End- \$70,000 Total- \$140,000		Jack Eberspacher Richard Gupton Meghan Kolassa Jim Thrift 4 Lobbyists	\$35,000
Air Products & Chemicals Lobbying Entity: <i>Richard Goodstein</i> Mid Year- \$160,000 Year End- \$60,000 Total- \$220,000		Richard Goodstein 1 Lobbyist	\$32,000
American Chemistry Council Mid Year- \$1,120,000 Year End- \$1,270,000 Total- \$2,390,000		Jack Gerard Tom Gibson Martin Durbin Brent Perry James W. Conrad Jr. 5 Lobbyists	\$270,867
American Chemistry Council Lobbying Entity: <i>Bob Moss Assoc.</i> Mid Year- \$50,000 Year End- \$60,000 Total- \$110,000		Bob Moss 1 Lobbyist	\$110,000
American Chemistry Council Lobbying Entity: <i>Holland & Knight</i> Mid Year- \$160,000 Year End- \$160,000 Total- \$320,000		Julie Adair Robert Bradner John Buscher Lynn Cutler Michael Galano Richard Gold Karl Koch Kathryn Lehman Ben Nighthorse Campbell Beth Viola Renee Wentzel David Whitestone 12 Lobbyists	\$67,402
American Chemistry Council Lobbying Entity: <i>Ogilvy Government Relations</i>		Julie Dammann John Green Chris John Drew Maloney Moses Mercado	\$60,000

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	Mid Year- Year End- Total-	\$120,000 \$60,000 \$180,000	Gordon Taylor Jimmy Williams 7 Lobbyists	
American Forest & Paper Assn.			Juanita Duggan Donna Harman Elizabeth Vandersari 3 Lobbyists	\$86,827
	Mid Year- Year End- Total-	\$1,440,000 \$1,700,000 \$3,140,000		
American Frozen Food Institute			Leslie Sarasin Susan Siemietkowski Robert Garfield Lucas Darnell Jorge Martinez Jason Bassett 6 Lobbyists	\$40,000
	Mid Year- Year End- Total-	\$30,000 \$50,000 \$80,000		
American Frozen Food Institute			Gary Jay Kushner 1 Lobbyist	\$20,000
Lobbying Entity: <i>Hogan & Hartson</i>	Mid Year- Year End- Total-	\$20,000 \$20,000 \$40,000		
American Petroleum Institute			Lou Hayden Kyle Harmon Caroline Atkins Christopher Joyner 4 Lobbyists	\$169,597
	Mid Year- Year End- Total-	\$1,640,000 \$2,360,000 \$4,000,000		
American Public Works Assn.			Julia Anastasio James Fahey Daniel Jensen Peter King 4 Lobbyists	\$57,777
	Mid Year- Year End- Total-	\$260,000 \$200,000 \$460,000		
Arch Chemicals			Charles Barnett James Massie 2 Lobbyists	\$120,000
Lobbying Entity: <i>Alpine Group</i>	Mid Year- Year End- Total-	\$80,000 \$80,000 \$160,000		
Arkema			Charles Kitchen 1 Lobbyist	\$3,949
	Mid Year- Year End- Total-	\$100,000 \$210,000 \$310,000		
Ashland Inc.			Brenda Anderson Michael J Toohy	\$151,071

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	Mid Year- Year End- Total-	\$470,000 NA \$470,000		
Association of California Water Agencies			2 Lobbyists	
	Mid Year- Year End- Total-	\$95,000 \$95,000 \$190,000	David Reynolds Abby Schneider Adrian Coffey	\$31,666
			3 Lobbyists	
BASF Corporation			Gregory Thies Steven Goldberg Clyde Miller JD Purvis Kenneth Furst James Bero	\$225,396
	Mid Year- Year End- Total-	\$497,453 \$537,532 \$1,034,985		
			6 Lobbyists	
BASF			Thomas Coleman	\$120,000
Lobbying Entity: <i>Tom Coleman and Assoc. LLC</i>				
	Mid Year- Year End- Total-	\$150,000 \$150,000 \$300,000		
			1 Lobbyist	
Bayer			Jean D Reimers Juliane H Van Egmond	\$300,215
	Mid Year- Year End- Total-	\$2,080,000 \$1,625,000 \$3,705,000		
			2 Lobbyists	
Celanese			Gerald Ferrara	\$40,000
	Mid Year- Year End- Total-	\$100,000 \$100,000 \$200,000		
			1 Lobbyist	
CIBA Corp			John L Deming Vincent Livoti	\$116,667
	Mid Year- Year End- Total-	\$285,000 \$275,000 \$560,000		
			2 Lobbyists	
CF Industries, Inc.			Rosemary O'Brien	\$92,000
	Mid Year- Year End- Total-	\$220,000 \$240,000 \$460,000		
			1 Lobbyist	
Consumer Specialty Products			Mario Mairena	\$25,000

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	Mid Year- Year End- Total-	\$100,000 \$100,000 \$200,000	1 Lobbyist	
Coors Brewing Company			Richard Crawford	\$48,541
	Mid Year- Year End- Total-	\$500,000 \$440,000 \$940,000	1 Lobbyist	
Corn Refiners Association			Steven Lomax	\$7,000
	Mid Year- Year End- Total-	\$200,000 \$140,000 \$340,000	1 Lobbyist	
Croplife America			Allen Greenwood Darren Pittman Rod Snyder Jay Vroom	\$200,000
	Mid Year- Year End- Total-	\$800,000 \$1,085,000 \$1,885,000	4 Lobbyists	
Dow Chemical Company			Brooke Lundquist Theodore F. Verheggen	\$285,833
	Mid Year- Year End- Total-	\$1,900,000 \$1,530,000 \$3,430,000	2 Lobbyists	
Dow AgroSciences			Bradley S. Schurdt	\$126,666
	Mid Year- Year End- Total-	\$380,000 \$76,000 \$456,000	1 Lobbyist	
Dupont Co.			Julie Manes Jeffrey Pannozzo Michael Parr Clifton R. Webb Sharee Lawler Celeste Boykin Dennis Kountz	\$1,083,375
	Mid Year- Year End- Total-	\$1,200,000 \$2,040,000 \$3,240,000	7 Lobbyists	
Exxon Mobil			Jo Mitchell	\$162,884
	Mid Year- Year End- Total-	\$6,440,000 \$10,500,000 \$16,940,000	1 Lobbyist	
FMC Corporation			Gerald R. Prout	\$225,731
	Mid Year-	\$760,000		

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	Year End- Total-	\$810,000 \$1,570,000	1 Lobbyist	
FMC Corporation			Bob Moss	\$60,000
Lobbying Entity: <i>Bob Moss Assoc.</i>				
	Mid Year- Year End- Total-	\$30,000 \$30,000 \$60,000	1 Lobbyist	
Halliburton			Donald Deline Robert Moran	\$26,547
	Mid Year- Year End- Total-	\$150,000 \$150,000 \$300,000	2 Lobbyists	
Honeywell			Christine Ciccone Brian Griffin Timothy Keating Elizabeth Rossman Chris Spear Lawrence Kast Paul Zurawski	\$263,179
	Mid Year- Year End- Total-	\$2,800,000 \$2,140,000 \$4,940,000	7 Lobbyists	
Huntsman Corporation			John Fluharty Mike Meroney	\$56,110
	Mid Year- Year End- Total-	\$225,000 \$350,000 \$575,000	2 Lobbyists	
Internation Dairy Foods Assn.			Clay Dettlesen Kristin Pearson Wilcox Jerry Slominski	\$73,500
	Mid Year- Year End- Total-	\$250,000 \$240,000 \$490,000	3 Lobbyists	
International Paper			Karen Neale Lee Pittman John Runyan Ann Wroblewski	\$128,776
	Mid Year- Year End- Total-	\$1,220,000 \$1,250,000 \$2,470,000	4 Lobbyists	
Koch Industries			Katherine Haggett Rebecca Hawes Brian Henneberry Matthew Schlapp	\$258,857
	Mid Year- Year End- Total-	\$1,640,000 \$2,530,000 \$4,170,000	4 Lobbyists	
Koch Industries			Thomas Pyle Colin Chapman Barry Rhoads	\$19,999
Lobbying Entity: <i>Rhoads Group</i>				
	Mid Year-	\$100,000		

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	Year End- Total-	\$40,000 \$140,000	3 Lobbyists	
Koch Industries			Thomas Pyle	\$5,714
Lobbying Entity: <i>Pyle Consulting, Inc.</i>				
	Mid Year- Year End- Total-	Registration \$40,000 \$40,000	1 Lobbyist	
Koch Industries			Andrew Siff	\$5,555
Lobbying Entity: <i>Siff & Lake LLP</i>				
	Mid Year- Year End- Total-	\$100,000 \$100,000 \$200,000	1 Lobbyist	
Lanxess Corporation			Earl Bohn	\$40,000
	Mid Year- Year End- Total-	\$40,000 Terminated \$40,000	1 Lobbyist	
Lyondell Chemical			Joel Heilman Algene Sajery	\$271,333
	Mid Year- Year End- Total-	\$1,260,000 \$1,480,000 \$2,740,000	2 Lobbyists	
Marathon Oil Company			Patricia Richards Kevin Avery	\$167,499
	Mid Year- Year End- Total-	\$2,010,000 \$3,680,000 \$5,690,000	2 Lobbyists	
Monsanto			Jim Travis Michael Parrish Grant Erdel Jennifer Daulby Michael Dykes	\$164,285
	Mid Year- Year End- Total-	\$2,200,000 \$2,300,000 \$4,500,000	5 Lobbyists	
National Association of Chemical Distributors			Jennifer Gibson	\$18,000
	Mid Year- Year End- Total-	\$39,000 \$15,000 \$54,000	1 Lobbyist	
National Assoc. of Manufacturers			Dorothy Coleman Jay Timmons Bryan Brendle John Engler Doug Kurkul	\$292,758
	Mid Year- Year End-	\$2,640,000 \$3,580,000		

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	Total-	\$6,220,000	Patty Long Tim Lugbill Meredith Jessup Keith McCoy Jim Neil Aric Newhouse Jeff Noah Rosario Palmeiri Marc-Anthony Signorino LeAnn Wilson Andrew Acker Teresa De Roco-Cupit Nicholas Morse Bill Primosch Keith Smith Ryan Modlin 21 Lobbyists	
National Association of Water Companies			Erika Berlinghof Cade Clark Peter Cook Louis Jenny 4 Lobbyists	\$80,000
	Mid Year-	\$200,000		
	Year End-	\$200,000		
	Total-	\$400,000		
National Council of Farmer Cooperatives			Jackie Klippenstein Kam Quarles 2 Lobbyists	\$34,469
	Mid Year-	\$460,000		
	Year End-	\$520,000		
	Total-	\$980,000		
National Mining Association			Tawny Bridgeford Daniel Gerkin Maggie Hlobik Rich Nolan Harold P. Quinn Bruce Watzman 6 Lobbyists	\$275,491
	Mid Year-	\$1,660,000		
	Year End-	\$2,430,000		
	Total-	\$4,090,000		
National Petrochemical & Refiners Association			Charlie Drevna Margaret Caravelli David Friedman Jessie Skinner Maurice McBride 5 Lobbyists	\$199,518
	Mid Year-	\$536,000		
	Year End-	NA		
	Total-	\$536,000		
National Propane Gas Association			Brian Caudill Philip Squair Mike Calderera Richard Roldan Michael Troop 5 Lobbyists	\$178,095
	Mid Year-	\$320,000		
	Year End-	\$360,000		
	Total-	\$680,000		

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<p>National Association of Wheat Growers</p> <p>Mid Year- \$60,000 Year End- \$60,000 Total- \$120,000</p>	<p>Mark Gaede Jennifer Spurgat Darren Coppock Barry Morton</p> <p>4 Lobbyists</p>	<p>\$10,262</p>
<p>Occidental Intl Group</p> <p>Mid Year- \$1,240,000 Year End- \$1,400,000 Total- \$2,640,000</p>	<p>James "Jace" Hassett</p> <p>1 Lobbyist</p>	<p>\$38,888</p>
<p>OGE Energy Corporation</p> <p>Lobbying Entity: <i>Williams & Jensen</i></p> <p>Mid Year- \$280,000 Year End- \$200,000 Total- \$480,000</p>	<p>George Baker</p> <p>1 Lobbyist</p>	<p>\$240,000</p>
<p>PPG Industries</p> <p>Mid Year- \$350,000 Year End- \$350,000 Total- \$700,000</p>	<p>William Ries</p> <p>1 Lobbyist</p>	<p>\$56,875</p>
<p>Praxair</p> <p>Mid Year- \$500,000 Year End- \$600,000 Total- \$1,100,000</p>	<p>Valerie King</p> <p>1 Lobbyist</p>	<p>\$166,666</p>
<p>Rohm & Haas</p> <p>Mid Year- \$340,000 Year End- \$500,000 Total- \$840,000</p>	<p>Geoffrey Hurwitz</p> <p>1 Lobbyist</p>	<p>\$168,333</p>
<p>RPM International</p> <p>Lobbying Entity: <i>CJR Group</i></p> <p>Mid Year- \$60,000 Year End- \$50,000 Total- \$110,000</p>	<p>Laurel Dawson Joe Pouliot Josh Rubin</p> <p>3 Lobbyists</p>	<p>\$36,666</p>
<p>RPM International</p> <p>Lobbying Entity: <i>Nelson, Mullins, Riley, Scarborough</i></p> <p>Mid Year- \$60,000 Year End- Terminated Total- \$60,000</p>	<p>Kevin McMahon Ana Meuwissen</p> <p>2 Lobbyists</p>	<p>\$60,000</p>
<p>Shell Oil Co.</p>	<p>Susan Childs Brian Malnak</p>	<p>\$49,283</p>

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	Mid Year- Year End- Total-	\$1,380,000 \$1,380,000 \$2,760,000	James Rich Elizabeth Stolpe 4 Lobbyists	
SQM North America			John Thorne	\$10,000
Lobbying Entity: C&M Capitolink	Mid Year- Year End- Total-	\$120,000 \$40,000 \$160,000	1 Lobbyist	
Sunoco			Albert Knoll	\$112,000
	Mid Year- Year End- Total-	\$280,000 \$280,000 \$560,000	1 Lobbyist	
Synthetic Organic Chemicals Manufacturers Association			James Cooper Joe Acker Jeff Gunnulfsen Sarah Mechum William Allmond 5 Lobbyists	\$51,552
	Mid Year- Year End- Total-	\$80,000 \$80,000 \$160,000		
Tesoro Corporation			Stephen Brown	\$35,428
	Mid Year- Year End- Total-	\$95,000 \$115,000 \$210,000	1 Lobbyist	
U.S. Chamber of Commerce			Thomas J Donohue Bruce R Josten Rolf Lundberg William Kovacs Thomas Myers Jason Conley Philip C. Beram Giovanni Coratolo Ronald Eidshaug Janet Friedl Phillips Hinch Peter Lawson Michelle Lopez Timothy Maney Elizabeth Mark Chris Merida Ashley Miller William Miller Martin A. Regalia Katie Strong Terrence Thompson Nicole Venable	\$3,750,829
	Mid Year- Year End- Total-	\$11,780,000 \$19,060,000 \$30,840,000		

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			Ann Beauchesne Jason Goldman Chris Braddock Jack Clark Caroline Harris Matthew Eggers 28 Lobbyists	
Valero Energy Corporation			Craig Felner James Greenwood 2 Lobbyists	\$74,000
	Mid Year-	\$340,000		
	Year End-	\$360,000		
	Total-	\$700,000		
Vulcan Materials			Michael Bell Lance Bultena Michael Gilliland Michael House Robert Kyle Jeff Mang John Stanton Christine Warnke Gwen Mellor Reid Stuntz 10 Lobbyists	\$540,000
Lobbying Entity: <i>Hogan & Hartson</i>	Mid Year-	\$240,000		
	Year End-	\$300,000		
	Total-	\$540,000		
Weyerhaeuser			Heidi Brock Shari Brown Andrea Howell Amy Schaeffer 4 Lobbyists	\$166,972
	Mid Year-	\$800,000		
	Year End-	\$1,060,000		
	Total-	\$1,860,000		

64 Lobbying Entities		238 Lobbyists	\$12,502,903
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Total Lobbyists	462
Chemical Security Lobbyists	238

Total Spent on Lobbying	\$130,625,985
Chemical Security Lobbying	\$12,502,903

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