

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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AD HOC METALS COALITION,  
c/o King & Spalding  
1730 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Plaintiff,

v.

Civil Action No. \_\_\_\_\_

CHRISTINE TODD WHITMAN,  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY,  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Defendants.

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**COMPLAINT**

1. This is an action brought pursuant to the Administrative Procedure Act, 5 U.S.C. § 702, and the Regulatory Flexibility Act as amended by the Small Business Regulatory Enforcement Fairness Act (“RFA”), 5 U.S.C. § 611, seeking review of a final action by Defendants Christine Todd Whitman and the United States Environmental Protection Agency (“EPA” or “Agency”). Plaintiff seeks an order holding unlawful and setting aside the final rule promulgated by EPA pursuant to the Emergency Planning and Community Right-to-Know Act of 1986 (“EPCRA”), 42 U.S.C. §§ 11001 *et seq.*, that

lowered the reporting thresholds for lead and lead compounds under the Toxics Release Inventory (“TRI”) program established pursuant to Section 313 of EPCRA. 66 Fed. Reg. 4500 (Jan. 17, 2001) (“the challenged rule”).

2. The Ad Hoc Metals Coalition seeks declaratory, injunctive, and other appropriate relief setting aside the challenged rule on the grounds that, *inter alia*, (1) EPA unlawfully lowered the TRI reporting thresholds for lead and lead compounds based on the application of classification criteria that are not scientifically valid for metals or inorganic metal compounds; (2) EPA unlawfully lowered the TRI reporting thresholds for lead and lead compounds based on the application of classification criteria that the Agency itself has not finally determined are scientifically appropriate for metals; (3) EPA violated RFA by dispensing with the statute’s small business consultation and related requirements on the basis of an inadequately supported certification that the rule would not have a “significant economic impact on a substantial number of small entities”; (4) EPA acted arbitrarily and capriciously by setting the reporting threshold for lead and lead compounds based on an analysis of reporting burdens and benefits that is not adequately supported or explained; (5) EPA unlawfully applied reporting requirements under Section 313 of EPCRA to a period preceding the effective date of the rule, thereby giving the rule retroactive effect; and (6) EPA exceeded its statutory authority by reducing the TRI reporting threshold for lead and lead compounds below the levels established by Congress.

## **JURISDICTION**

3. This Court has federal question jurisdiction over this action pursuant to 28 U.S.C. § 1331, and has authority to grant the declaratory and other relief sought pursuant to 28 U.S.C. § 2201 and 5 U.S.C. §§ 705, 706.

## **VENUE**

4. Venue is proper in this District pursuant to 28 U.S.C. § 1391(e)(1) in that Defendant Christine Todd Whitman is an officer or employee of the United States and performs her official duties within this District.

## **PARTIES**

5. The Ad Hoc Metals Coalition (“Coalition”) is a coalition of trade associations, many of whose members produce, manufacture, process, use, or distribute lead and lead compounds and will be required to comply with the challenged rule. The Coalition’s principal place of business is c/o King & Spalding, 1730 Pennsylvania Avenue, N.W., Washington, D.C. 20006. It is composed of the following groups:

- American Electroplaters and Surface Finishers Society, a trade association whose principal place of business is 12644 Research Parkway, Orlando, Florida 32826-3298;
- American Institute of Organbuilders, a trade association whose principal place of business is P.O. Box 130982, Houston, Texas 77219;
- American Iron and Steel Institute, a trade association whose principal place of business is 1101 17<sup>th</sup> Street, NW, Suite 1300, Washington, DC 20036;

- American Pipe Fittings Association, Inc., a trade association whose principal place of business is 111 Park Place, Falls Church, Virginia 22046-4513;
- American Sportfishing Association, a trade association whose principal place of business is 1033 N. Fairfax Street, # 200, Alexandria, Virginia 22314;
- American Wire Producers Association, a trade association whose principal place of business is 6232 Roudsby Lane, Alexandria, Virginia 22315-5285;
- American Zinc Association, a trade association whose principal place of business is 1112 Sixteenth Street, NW, Suite 240, Washington, DC 20036;
- Art Glass Suppliers Association International, a trade association whose principal place of business is 1100-H Brandywine Boulevard, Zanesville, Ohio 43072-3388;
- Associated Pipe Organ Builders of America, a trade association whose principal place of business is P.O. Box 155, Chicago Ridge, Illinois 60415;
- Association of Battery Recyclers, a trade association whose principal place of business is P.O. Box 290286, Tampa, Florida 33687;
- Coalition for Safe Ceramicware, a trade association whose principal place of business is 3050 K Street, N.W., Suite 400, Washington, DC 20007;
- Cold Finished Steel Bar Institute, a trade association whose principal place of business is 700 14<sup>th</sup> Street, N.W., Suite 900, Washington, DC 20005;
- Council of Industrial Boiler Owners, a trade association whose principal place of business is 6035 Burke Centre Parkway, Suite 360, Burke, Virginia 22015;

- International Cadmium Association, North America, a trade association whose principal place of business is P.O. Box 924, Great Falls, Virginia 22066;
- International Crystal Federation, a trade association whose principal place of business is 300 Centreville Road South, Warwick, Rhode Island 02886.
- IPC — Association Connecting Electronics Industries, a trade association whose principal place of business is 2215 Sanders Road, Northbrook, Illinois 60062;
- Lead Industries Association, a trade association whose principal place of business is 13 Main Street, Sparta, New Jersey 07871;
- Metal Finishing Suppliers Association, a trade association whose principal place of business is 112 J Elden Street, Herndon, Virginia 20170;
- The Metal Powder Industries Federation, a trade association whose principal place of business is 105 College Road East, Princeton, New Jersey 08540;
- National Association of Metal Finishers, a trade association whose principal place of business is 112 J Elden Street, Herndon, Virginia 20170;
- National Mining Association, a trade association whose principal place of business is 1130 17<sup>th</sup> Street, NW, Washington, DC 20036;
- The National Muzzle Loading Rifle Association, a trade association whose principal place of business is P.O. Box 67, Friendship, Indiana 47021;
- The National Shooting Sports Foundation, a trade association whose principal place of business is 11 Mile Hill Road, Newtown, Connecticut 06470;

- The Nickel Development Institute, a trade association whose principal place of business is 214 King Street West, Suite 510, Toronto, Ontario, Canada M5H 3S6;
- The Nickel Producers Environmental Research Association, a trade association whose principal place of business is 2605 Meridian Parkway, Suite 200, Durham, North Carolina 27713;
- The Non-Ferrous Founders' Society, a trade association whose principal place of business is 1480 Renaissance Drive, Suite 310, Park Ridge, Illinois 60068;
- The North American Die Casting Association, a trade association whose principal place of business is 9701 West Higgins Road, Suite 880, Rosemont, Illinois 60018-4721;
- Porcelain Enamel Institute, a trade association whose principal place of business is 5696 Peachtree Parkway, P.O. Box 920220, Norcross, Georgia 30092;
- The Precision Machined Products Association, a trade association whose principal place of business is 6700 West Snowville Road, Brecksville, Ohio 44141;
- The Rubber Manufacturers Association, a trade association whose principal place of business is 1400 K Street, NW, Suite 900, Washington, DC 20005;
- Shipbuilders Council of America, a trade association whose principal place of business is 1600 Wilson Boulevard, Suite 1000, Arlington, Virginia 22209;
- The Silver Institute, a trade association whose principal place of business is 1112 16<sup>th</sup> Street, N.W., Suite 240, Washington, DC 20036;

- Society of Glass and Ceramic Decorators, a trade association whose principal place of business is 4340 East West Highway, Suite 200, Bethesda, Maryland 20814;
- Specialty Steel Industry of North America, a trade association whose principal place of business is 3050 K Street, N.W., Washington, DC 20007;
- Stained Glass Association of America, a trade association whose principal place of business is 4450 Fenton Road, Hartland, Michigan 48353; and
- Surface Mount Technology Association, a trade association whose principal place of business is 5200 Willson Road, Suite 215, Edina, Minnesota 55424.

6. Defendant Christine Todd Whitman is the Administrator of the United States Environmental Protection Agency, and is being sued in her official capacity. The Administrator has the statutory authority to administer EPCRA § 313, the TRI reporting program.

7. Defendant Environmental Protection Agency (“EPA”) is a United States federal agency responsible for the administration and enforcement of EPCRA. EPA developed, proposed, and promulgated the challenged rule.

### **STATUTORY BACKGROUND AND RULEMAKING PROCEEDINGS**

8. EPCRA was enacted as Title III of the Superfund Amendments and Reauthorization Act of 1986. Section 313 of EPCRA requires owners and operators of facilities within specified industry sectors to submit annual reports to EPA containing information on the releases, transfers, and treatment methods associated with certain chemicals. EPCRA requires these owners and operators to submit a separate reporting

form for each listed chemical that is “manufactured,” “processed,” or “used” at the facility above specified threshold reporting amounts. Congress directed EPA to compile data from these forms in a computer database and make it accessible to the public. This database is called the Toxics Release Inventory.

9. Prior to issuance of the challenged rule, owners and operators of covered facilities were required by Section 313(f)(1) of EPCRA to submit reports to the TRI if they “manufactured” or “processed” 25,000 pounds per year of lead or lead compounds, or “used” 10,000 or more pounds per year of lead or lead compounds. 42 U.S.C. § 11023(f)(1).

10. On August 3, 1999, EPA issued a proposed rule to lower the “manufacture,” “process,” and “use” thresholds for lead and lead compounds to 10 pounds per year. 64 Fed. Reg. 42222, 42232 (Aug. 3, 1999).

11. On January 17, 2001, EPA promulgated the final rule, entitled “Lead and Lead Compounds; Lowering of Reporting Thresholds; Community Right-to-Know Toxic Chemical Release Reporting; Final Rule.” 66 Fed. Reg. 4500 (Jan. 17, 2001). In the final rule, EPA reduced the “manufacture,” “process,” and “use” reporting thresholds for lead and lead compounds to 100 pounds as of January 1, 2001, and justified this action on the ground that “lead and lead compounds are PBT [persistent, bioaccumulative, toxic] chemicals.” 66 Fed. Reg. at 4501. The rule also eliminated the *de minimis* exemption, so that facilities will be required to count any amount of lead and lead compounds present in a mixture or trade name product toward the reporting thresholds. Further, EPA deleted the range reporting provisions for lead and lead compounds, depriving facilities of the

right to report reasonable estimates of certain releases within a range of levels rather than a specific amount.

12. As promulgated, the rule was scheduled to take effect on February 16, 2001, with the first reports under the lower threshold (covering calendar year 2001) due by July 1, 2002. On February 16, 2001, EPA postponed the effective date for 60 days until April 17, 2001, 66 Fed. Reg. 10585, but continued to require TRI reporting for activities dating back to January 1, 2001.

13. Numerous questions were raised during the comment period on the challenged rule regarding the use of the PBT methodology to evaluate the potential hazards of metals and inorganic metal compounds. In January 2000, EPA co-sponsored an “Experts Workshop” during which numerous scientific experts explained why application of the PBT methodology to metals is not consistent with sound science. At the Workshop, EPA officials and a Science Advisory Board (“SAB”) member stated that EPA’s proposed application of PBT criteria to metals had not been peer reviewed.

14. In May 2000, the SAB noted in an Advisory Opinion on a separate issue that EPA’s proposed “classification of metals as persistent, bioaccumulative toxicants (PBTs) is problematic, since their environmental fate and transport cannot be adequately described using models for organic contaminants.”

15. In July 2000, the Committee on Science of the U.S. House of Representatives, in a bipartisan letter from both the Committee and relevant Subcommittee, noted the scientific controversy surrounding the application of the PBT methodology to metals and metal compounds, and asked EPA to submit the issue to the

SAB for independent peer review. The Committee renewed its request in January 2001, and specifically urged EPA to seek SAB review of this question before lowering the reporting thresholds for lead and lead compounds. In October 2000, report language in the VA/HUD 2001 appropriations bill, the funding bill for EPA, urged EPA to send the PBT-metals question to the SAB before promulgating any rules or taking any other action based on the application of PBT concepts to metals.

16. EPA itself recognized that application of its PBT methodology to metals and inorganic metal compounds is scientifically questionable. Thus, when it issued the final rule, EPA stated that it would refer to the SAB the question of “how lead and other, as yet unclassified, metals such as cadmium, should be evaluated using the PBT chemical framework, including which types of data (and which species) are most suitable for these determinations.” 66 Fed. Reg. at 4518.

### **CLAIM I**

#### **EPA UNLAWFULLY LOWERED THE TRI REPORTING THRESHOLDS FOR LEAD AND LEAD COMPOUNDS BY APPLYING CRITERIA THAT ARE SCIENTIFICALLY INVALID FOR METALS SUCH AS LEAD**

17. Plaintiff incorporates by reference the allegations contained in paragraphs 1 - 16 of this Complaint.

18. To justify the lower reporting threshold adopted in the challenged rule, EPA classified lead and lead compounds as PBT chemicals using a methodology that was developed to assess the hazards and risks associated with synthetic organic chemicals. The rulemaking record shows that use of this PBT methodology to evaluate the potential hazards of metals and inorganic metal compounds is scientifically unjustified.

Information to this effect was submitted not only by interested parties but by invited experts at a scientific workshop co-sponsored by EPA. The Agency's own SAB questioned the appropriateness of applying PBT methodology to metals.

19. Because EPA's application of its PBT methodology to metals is not scientifically justified, its decision to reduce the TRI reporting thresholds for lead and lead compounds based on a PBT classification is arbitrary, capricious, and an abuse of discretion.

## CLAIM II

### **EPA UNLAWFULLY LOWERED THE TRI REPORTING THRESHOLDS FOR LEAD AND LEAD COMPOUNDS BY APPLYING CRITERIA THAT THE AGENCY ITSELF HAS NOT FINALLY DETERMINED ARE SCIENTIFICALLY APPROPRIATE FOR METALS**

20. Plaintiff incorporates by reference the allegations contained in paragraphs 1 - 19 of this Complaint.

21. EPA's decision to lower the reporting thresholds for lead and lead compounds was based on a determination that they are PBT chemicals.

22. That determination reflected the application of a PBT methodology that was developed to assess the hazards and risks of synthetic organic chemicals. EPA itself has not yet made a final decision on whether it is scientifically appropriate to apply its PBT methodology to metals and, if it is, how that should be done. The Agency has said it will refer this question to its Science Advisory Board for review and advice.

23. Despite the fact that it had not finally resolved the scientific questions that were critical to its decision to characterize lead and lead compounds as PBT chemicals,

EPA treated them as such by promulgating the challenged rule before the SAB peer review process was even initiated.

24. By promulgating the challenged rule under these circumstances, EPA imposed substantial burdens and costs on industry before ascertaining whether the rule has a credible scientific justification — thereby acting arbitrarily, capriciously, and in violation of law.

### **CLAIM III**

#### **EPA UNLAWFULLY FAILED TO COMPLY WITH RFA REQUIREMENTS DURING DEVELOPMENT OF THE RULE**

25. Plaintiff incorporates by reference the allegations contained in paragraphs 1 - 24 of this Complaint.

26. Under RFA, EPA must conduct small business outreach and gather input prior to proposing a rule that will have a significant economic impact on a substantial number of small entities. Section 609 of RFA requires EPA to convene a review panel to collect advice and recommendations from small entity representatives about the potential impacts of a proposed rule and ways to tailor the rule to minimize impacts on small business while accomplishing the stated objectives of the statute. RFA requires that this panel be convened before publication of a proposed rule in the Federal Register.

27. Before issuing the proposed rule relating to TRI reporting thresholds for lead and lead compounds, EPA did not convene a small business panel or conduct any other small business outreach under RFA.

28. EPA guidelines for compliance with RFA indicate that if EPA finds that the impacts associated with a rule could exceed one percent of annual revenues of affected small business entities, the Agency must conduct further investigation before it can certify under Section 605(b) of RFA that the rule will not have a significant economic impact on a substantial number of small entities.

29. When it published the proposed rule, EPA certified that the challenged rule would not have a significant economic impact on a substantial number of small entities. This initial certification was based on EPA's conclusion that the proposed rule would affect about 5,600 small businesses but that none would experience first-year compliance costs over one percent of its annual revenues. By making this certification, EPA dispensed, *inter alia*, with the requirements of Section 603 of RFA to prepare an initial regulatory flexibility analysis and conduct small business consultation.

30. EPA later revised its economic analysis to conclude that the proposed rule would affect more than 8,600 small companies, with as many as 464 of them experiencing first-year compliance costs of at least one percent of their annual revenues. Nevertheless, EPA again found that the rule would not have a significant economic impact on a substantial number of small entities.

31. When it published the final rule, EPA stated that the 100 pound reporting threshold would affect 4,068 small companies and municipalities, approximately six percent of which would experience impacts between one and three percent of annual revenues in the first year. Notwithstanding this finding, EPA certified that the rule would not have a significant economic impact on a substantial number of small entities, and

accordingly did not prepare a final regulatory flexibility analysis as required by Section 604 of RFA.

32. EPA failed to investigate and estimate properly the impact on small businesses that would be required to file new TRI reports and severely underestimated the number of small businesses that will be affected within certain industries. Moreover, even by its own calculations, the small business impacts that EPA identified are inconsistent with a determination that the rule would not have a significant economic impact on a substantial number of small entities.

33. Consequently, EPA violated RFA by failing to conduct appropriate small business outreach, improperly analyzing impacts on small business, and making an unjustified certification.

#### **CLAIM IV**

##### **EPA UNLAWFULLY SET THE REPORTING THRESHOLD BASED ON AN INADEQUATE ECONOMIC ANALYSIS OF THE CHALLENGED RULE**

34. Plaintiff incorporates by reference the allegations contained in paragraphs 1 - 33 of this Complaint.

35. EPA prepared an economic analysis of the final rule to justify the 100 pound reporting threshold. EPA concluded that 9,813 additional facilities will report annually to the TRI under the lowered thresholds. The Agency estimated that the costs of this reporting for private industries would be \$80 million in the first year, and \$40 million in subsequent years.

36. In calculating these compliance costs, EPA identified additional industry sectors that could be affected by the rule but did not estimate the economic impact of the rule on these industries. Also, EPA failed to consider all activities associated with the cost of making threshold determinations and filing TRI reports, despite being advised of this failure.

37. In estimating the number of additional facilities that would have to file TRI lead reports, EPA made assumptions that were improper and underestimated the actual number of affected facilities.

38. EPA did not attempt to quantify or monetize the benefits of the lowered reporting thresholds for lead and lead compounds, thus making impossible an evaluation of the economic justification for the rule.

39. Consequently, EPA acted arbitrarily and capriciously by improperly estimating the number of companies that would be affected by the new 100 pound reporting thresholds, improperly calculating the costs of compliance with the rule, and making no effort to quantify the benefits associated with the rule — even though it purported to set the new reporting threshold on the basis of a balancing of costs and benefits.

#### **CLAIM V**

#### **EPA UNLAWFULLY APPLIED THE LOWER REPORTING THRESHOLDS TO A PERIOD PRECEDING THE EFFECTIVE DATE OF THE RULE**

40. Plaintiff incorporates by reference the allegations contained in paragraphs 1 - 39 of this Complaint.

41. The effective date of the rule, which originally was set for February 16, 2001, currently is set for April 17, 2001. 66 Fed. Reg. 10585 (Feb. 16, 2001). The rule requires facilities to submit reports covering their activities during a period of more than three months before its effective date.

42. As acknowledged in EPA's economic analysis of the final rule, thousands of companies will be newly affected by the lowered reporting thresholds for lead and lead compounds and will have to report releases to the TRI for the first time. Many of these companies have no mechanisms in place to collect the necessary information concerning their "manufacture," "process," or "use" (or their releases or transfers) of these chemicals dating back to January 1, 2001. Yet facilities will have to collect information covering the period beginning January 1, 2001, in order to comply with the challenged rule.

43. The Administrative Procedure Act defines a "rule" as "an agency statement of general or particular application and future effect." 5 U.S.C. § 551(4) (emphasis added). Retroactivity of a rule is not favored in law unless expressly authorized by Congress.

44. Consequently, EPA acted arbitrarily, capriciously, in excess of its statutory authority, and otherwise not in accordance with law, by applying TRI reporting requirements to a period prior to the date on which the rule becomes effective, thereby impermissibly giving the rule retroactive effect.

## CLAIM VI

### **EPA EXCEEDED ITS STATUTORY AUTHORITY BY REDUCING THE TRI REPORTING THRESHOLDS FOR LEAD AND LEAD COMPOUNDS BELOW THE LEVELS ESTABLISHED BY CONGRESS**

45. Plaintiff incorporates by reference the allegations contained in paragraphs 1 - 44 of this Complaint.

46. In Section 313(f)(1) of EPCRA, Congress set TRI reporting thresholds of 10,000 pounds per year for a toxic chemical that is “used” at a facility and 25,000 pounds per year for a toxic chemical that is “manufactured or processed” at a facility in calendar year 1989 and thereafter. 42 U.S.C. § 11023(f)(1).

47. Section 313(f)(2) of EPCRA authorizes the EPA Administrator to establish a different threshold amount, but the only guidance EPCRA provides for such action is that the “revised threshold shall obtain reporting on a substantial majority of total releases of the chemical at all facilities subject to the requirements of this section.” 42 U.S.C. § 11023(f)(2). As EPA acknowledges: “No further prerequisites for exercising this authority appears [sic] in the statute.” 66 Fed. Reg. at 4501.

48. For purposes of determining whether a revised threshold “obtain[s] reporting on a substantial majority of total releases” within the meaning of Section 313(f)(2), the reference to “facilities subject to the requirements of this section” means those “facilities currently reporting” under Section 313. *See* 66 Fed. Reg. at 4501. Accordingly, the standard Congress provided in Section 313(f)(2) may “effectively constrain[] EPA’s ability to *increase* the thresholds,” 66 Fed. Reg. at 4506 (emphasis added), because a threshold may not be increased to a point where the reported releases

no longer will reflect “a substantial majority of total releases” at those facilities that had reported releases of the chemical prior to the change. But Section 313(f)(2) *provides no constraint whatsoever* on EPA’s asserted authority to *reduce* the TRI reporting thresholds established by Congress, because *any* reduced threshold — regardless of the level selected — necessarily will obtain reporting on *all* of the “facilities currently reporting.” Thus, Section 313(f)(2) provides “neither explicit prerequisites . . . to the Agency’s determination that a lower threshold is warranted, nor a standard whose plain language effectively constrains EPA’s discretion in selecting the appropriate lower threshold . . . .” 66 Fed. Reg. at 4506.

49. The fact that Section 313(f)(2) provides a standard to constrain EPA’s discretion when *increasing* TRI reporting thresholds but no standard whatsoever to guide or constrain EPA’s discretion in *reducing* those thresholds reflects congressional intent to withhold from EPA the authority to reduce the reporting thresholds established in Section 313(f)(1). A contrary interpretation—which construes Section 313(f)(2) as giving EPA discretion to reduce TRI reporting thresholds while providing literally no guidance for the exercise of that discretion—would raise serious constitutional questions regarding delegation of legislative power.

50. By reducing the TRI reporting threshold for lead and lead compounds below the levels established by Congress, EPA exceeded its statutory authority.

## PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in its favor and:

1. Declare that EPA's lowering of the reporting thresholds for lead and lead compounds under the TRI program exceeded its statutory authority, was arbitrary and capricious, an abuse of discretion, and otherwise not in accordance with law;
2. Set the challenged rule aside and enjoin Defendants from enforcing any TRI reporting requirements for lead and lead compounds under this lower threshold;
3. If the challenged rule is not set aside, declare that the reduced reporting threshold for lead and lead compounds will not apply until calendar year 2002 at the earliest;
4. If the challenged rule is not set aside, suspend enforcement of the rule until such time as the Agency complies with the requirements of RFA; and
5. Grant such other relief as may be just and appropriate.

Respectfully submitted this 10<sup>th</sup> day of April, 2001.

By \_\_\_\_\_  
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