



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

September 2, 1993

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Letters to the Editor
The Washington Post
1150 15th Street
Washington, DC 20071

Dear Editor:

As a twenty year veteran of EPA's hazardous waste program I have to take exception to your editorial (as well as my own agency's policy) about Superfund reform. There are a great many things wrong with the wasteful, inefficient Superfund program, but strict liability for the producers and dumpers of hazardous waste is not one of them. In fact, it is the best thing about the program.

EPA's regulation and enforcement of hazardous waste disposal is weak, spotty and easily subject to political and big money influence and corruption. However, the fear of strict liability has served to condition American industries to take responsibility for what they do with their toxic and hazardous waste and to reduce their dependence on the use of dangerous materials. Of course this process is painful: breaking bad habits is always painful. Of course American industries would rather have the costs of their irresponsible actions shared by the multitude; there's nothing like strict liability for converting a capitalist to socialism.

But think about this:

If you don't hold the producer of the waste responsible, he has less motivation to behave responsibly.

It costs far far more to clean up the mess created by wastes disposed irresponsibly than it does to reduce and treat the wastes responsibly to begin with.

Strict liability works, and it costs the taxpayers nothing, in contrast to costly regulatory bureaucracies which don't work.

Sincerely,

/s/

William Sanjour