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While EPA has changed its posture on the employment of technology-based diversion practices, many believe the agency still could use a stiff overhaul. Meanwhile, other agencies such as the California EPA and CalRecycle are still mired in the thinking that gave us waste offshoring, so this 26-year-old editorial still has some steam left in it.

EPA Needs Its Ashes Hauled.

In the wake of serial "paradigm shifts" and "new gestalts" -- those periodic good-deal changes that rewarded you with a diet of spiked carrots and barbed sticks -- the MSW world seems to have surfaced in a saner, more rational era in which administrators and regulators tailor their actions to more closely fit the needs and demands of activities under their authority. While cynics might equate this belief with tightened budgets and overwork, it is perhaps more profitable to attribute the welcome civility to the recognition that any system -- particularly our system -- works better when all the parts are engaged.

Among indicators of the change I would call attention to the softening of support for the German approach to source reduction and recycling. While this approach to social and environmental problems has its adherents, authoritarian schemes seem to elevate our natural resistance to coercion to heights of creativity all too sadly lacking in the pursuit of such positive goals as minimizing environmental impacts or diverting waste away from landfills. Other signs of hope are found in the enlightened approach that Oregon, Ohio, Texas, and California are taking toward diversion goal attainment by the jurisdictions under their authority. Indeed, they are actively pursuing ways to assist in the process. There are dozens of similar examples, so why with all this enlightenment floating around does EPA still find it necessary to muddy its waters with political activism posing as science?

Mixing Politics and Science Makes For Good Neither

EPA's concerns are our concerns and all participants in MSW management activities share in a particularly vital role in the trench warfare of environmental pursuits. EPA should take a critical look at a

number of its positions and policies. It should look in terms of their effectiveness in meeting objectives within the reasonable constraints of time and money and as to their origin and scientific validity. For starters EPA's administrators might evaluate the agency's stance and performance relative to the following questions: (1) Is there an underlying anti-combustor bias that impedes or precludes an even-handed evaluation of the WTE component of MSW management? (2) Do the thoughts and findings of program experts within the agency receive the same degree of attention as those of the administrator's political advisors? (3) Are the mixed signals issued in connection with air programs (where a concerted attempt was made to get consensus on the Maximum Achievable Control Technology [MACT] regulations for MSW combustors) an indication of fundamental indecision or do they mask a separate agenda? In connection with the last, where is the MACT rule called for by the 1990 Clean Air Act Amendments and originally scheduled for 1991 then successively bounced to September 1993 and as of now, September 1, 1994?

EPA's solid waste program people -- and I fear far too many working professionals throughout the field -- have been curiously silent while the agency seized the opportunity to snake another waste stream into the hazardous side of the house despite the lack of evidence that it represents danger to health or to the environment. I am mystified. Do you or EPA's experts truly believe that fly ash streams generated within a combustor from MSW requires separate analysis and regulation? If there's a logical basis for this, will somebody please explain it to me? Moreover, would someone please explain to me what has led EPA to reverse its prior stance that MSW combustor ash was safe to be managed as a Subtitle D waste? Why indeed should the agency move to prevent this material from being reused when its own ethic is presumably committed to recycling?

In its present operational mode, EPA seems to base its actions on expediency and politically correct junk science rather than the cold, hard light of objective inquiry. Now the agency proposes to restructure itself along risk-assessment (rather than pollutant) lines while punting enforcement activities into the hands of industry where entrenched interests will be free to lobby their own protection. Whatever merits lie in restructuring remain to be seen, but turning enforcement over to industry smacks of asking the fox to guard the hen house. The consequences of EPA actions are too important to

root them in political expediency. It's time for all of us -- including the administrator -- to question the wisdom and efficacy of mixing politics and science and ask whether the present EPA should be disbanded in order to allow a needed separation of these forces.