

OFFICE OF SOLID WASTE

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4-2-81

Dear Sherrie:

Thank you for your recent letter dated February 11 in which you requested clarification of EPA's interest in economic data for developing hazardous waste regulations and of the question whether the Agency's authority under section 3007 of RCRA extends to economic data.

Section 3007 of RCRA authorizes the Agency to collect data relating to hazardous wastes "for the purpose of developing or assisting in the development of any regulation." Economic information may well be needed to develop Subtitle C regulations, particularly in light of Executive Order 12291.

Questions of legal authority aside, however, EPA strongly believes that it is in the best interest of the regulated community to supply such information. In developing these regulations, EPA carefully considers the cost of the regulations to the regulated community and the impacts these costs will have. To the extent that the regulated community will not provide such data so that EPA may consider these costs and impacts, they limit EPA's ability to do so with resulting prejudice to the interests of both the regulated community and the Agency.

I hope this information will answer your concerns. Please feel free to give me or Larry Buc of my staff a call if you have any further questions.

Sincerely yours,

John P. Lehman
Director
Hazardous & Industrial Waste Division (WH-565)

cc: Larry Buc

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