

9454.1987(01)

SOURCE REDUCTION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 21 1987

Ms. Irene Ginsberg
Apartment 1-C
235 Fort Washington Avenue
New York, New York 10032

Dear Ms. Ginsberg:

This is in response to your letter dated June 29, 1987, regarding the promoting of source reduction. In 1976, the U.S. Environmental Protection Agency (EPA) issued a policy statement outlining its preferred hazardous waste management strategy (41 FR 35050, August 18, 1976). That strategy, which favors source reduction and recycling over treatment and land disposal, has remained intact over the past decade despite comprehensive statutory amendments and substantial expansion of the hazardous waste program.

Source reduction is generally preferable to treatment because of the following:

Few treatment technologies are 100 percent effective.

Compliance with regulations under -- the various environmental programs will never be perfect, even with the most stringent enforcement programs.

In many instances, there is currently insufficient capacity to treat all of the hazardous waste streams generated in the United States.

Source reduction encourages a more wholistic approach to designing manufacturing processes that do not generate hazardous wastes.

However, it is impractical to assume that all waste can be eliminated by source reduction. For example, certain products simply cannot be manufactured without producing hazardous

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wastes. Excessive waste minimization requirements could remove products from the market. Further, wastes produced by a given process may be comparatively easy to treat or destroy, yet quite difficult to minimize through source reduction or recycling. Therefore, EPA also must encourage

The reduction of waste has long been a goal of the EPA. Our report to Congress issued last October on the minimization of hazardous waste fully considered many options do promote waste minimization. In the report, EPA has a specific definition for waste minimization, which supports the use of both source reduction and recycling (in descending order of preference). Enclosed please find a copy of this report's Executive Summary. We are now in the process of acting on many of the recommendations presented in the report, including programs aimed at data collection and technology transfer.

If you have any questions on the enclosed materials, you should contact James Berlow, Chief of the Office of Solid Waste's Treatment Technology Section, on (202) 382-7917.

Sincerely,

Original Document signed

Marcia E. Williams
Director
Office of Solid Waste

Enclosure

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