Association of State and Territorial
ASTSWMO
Solid Waste Management Officials

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Mr. Timothy Fields, Deputy Assistant Administrator
Office of Solid Waste and Emergency Response
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Dear Mr. Fields:

The purpose of this letter is to share with you, as the Chair of the Federal Facilities Environmental Restoration Dialogue Committee (FFERDC), the Association's views of the just completed final report of the FFERDC for "Improving Federal Facility Cleanup". ASTSWMO has maintained a high interest in this advisory committee process since its inception in 1991, and has consistently supported strong State participation on the committee throughout its life-span.

The Board of Directors of ASTSWMO has reviewed the committee's final report and wishes to share with you our statement of support for the constructive directions of the many recommendations for improving cleanups at federal facilities. As you know, States are integral in the regulatory process of managing cleanups, and have separate statutory authorities allowing them to directly influence the outcomes of those cleanups. Unfortunately, the record of the last decade is that the regulatory relationship between States and the responsible federal agencies has been stressful and difficult, and this has sometimes led to delays at individual sites.

From our State waste managers' perspective, we see the principal value of this report in identifying many of the factors forming the basis of this pervasive stress, and in offering a number of practical techniques for all participants to use in overcoming those barriers which have too often resulted in delays and inefficiencies. The suggested ways of improving coordination and communications among regulators and the federal departments, especially within the large, complex command structures prevalent in the Department of Defense, can greatly enhance the cleanup process if adopted. State waste managers are ready to work with base commanders and others to overcome existing barriers and improve communications.

The FFERDC has provided strong leadership in addressing greatly enhanced public participation in the federal facility cleanup process, and many of its recommendations have already been adopted in federal practice. The enunciation of fundamental principles in this report provides an excellent opportunity for federal policy

makers, both in the Administration and in Congress, to adopt balanced procedures which recognize long-term obligations, and avoid the pitfalls of lurching from one budgetary crisis to another in decisions regarding the national cleanup program. The discussion of priorities suggests useful potential ways to make adjustments in planning while maintaining the basic compliance structure which is fair to all parties to the facility agreement. All in all, we think the report can greatly improve the cleanup process on these federal facilities.

We commend you for your leadership in achieving this result, and note that the Keystone Center has done a remarkable job of facilitating such a purposely diverse committee membership resulting in this consensus report. We consider the report a valuable contribution to the national dialogue over this very important environmental issue, and congratulate all who participated in the project for achieving such useful agreement.

Sincerely,

Mary Jean Yon
President, ASTSWMO