

# **“The Next Four Years: An Agenda for Environmental Results”**

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George Bernard Shaw once observed that there were two kinds of work in the world. The first consisted of moving objects from place to place on the surface of the earth and the second consisted of telling other people to do so. While environmental protection consists largely of the first type—moving stuff from a place where it may do harm to a place where it won't—EPA's role is to define when, where, and how the move should take place.

Doing this sort of work right requires an enormous amount of careful thought. "Careful" because the laws of nature, which rule that work, are unforgiving, and not subject to amendment on Capitol Hill. Doing it right also requires a minimum amount of stability, continuity, and consistency. It can't be done in a firehouse atmosphere. If it is done "carefully" and "right", the benefits for us and our children can be immense.

For that reason, we must dedicate the next four years to obtaining measureable environmental results. We must improve the management of our programs and increase our understanding of what the Federal environmental protection enterprise can really accomplish.

Beyond that, we must begin to pursue a neglected facet of EPA's original charter. That is the integration of all environmental programs into a managed system, capable of focusing Federal authority on the reduction of environmental impacts wherever they are found, in the most effective and efficient way.

This is a pragmatic approach to a set of issues that have often been dominated by symbolic and political concerns, but I think its time has come. EPA has been given—perhaps not in the most thoughtful way possible—an almost frightening armory of powers. It can affect almost every aspect of American life—what we eat and drink and how much we pay for it, what we drive, what kind of gas we use, the kinds of jobs we can work at—from the laundry room to the board room, EPA is there.

This power makes it vital that we stay smart about where and how we insert it into our society. Americans have said over and over again that they want environmental protection, and that they are willing to sacrifice other goods to get it. What they haven't said, and won't say, is that they are willing to make sacrifices for nothing, or, at any rate for not much.

That is why I stress results. EPA is under obligation to show what we have accomplished in terms of concrete environmental values. Not how much money we spent, or how many people we employed or how much paper we moved. People want to know, is the air cleaner? Is

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the water cleaner? Have risks been reduced? Have the most risks been reduced for our cost and theirs?

We must make sure that our efforts over the next four years are concentrated on the reduction of *important* environmental risks, at places and in situations where the Federal power is *essential*. It is not efficiency alone that demands this discipline.

Nothing erodes the public's tolerance of a regulatory agency more than the imposition of burdens that appear to have only petty results in terms of some substantive public benefit. At the same time, nothing erodes the public's faith in a regulatory agency more than the appearance that it is not, for whatever reason, acting aggressively in the public interest.

My perception is that we have at this point achieved a reasonable balance between these two poles. I don't want to see the pendulum start swinging again, because if it does, the Agency will once again be distracted from its important goals by controversy and political friction.

We have to be particularly careful at present because we are moving to control areas that will have a more direct effect than ever before on the daily lives of our people. For example, we have implemented inspection and maintenance programs that Congress mandated for automobiles in about thirty metropolitan areas that do not meet air pollution standards. We are in the process of removing most of the lead from gasoline, which will affect millions of people across the country. And we are looking at controlling the vapor released when you fill your gas tank, which may add to the inconvenience of filling up the family car.

As we continue to focus on improving the performance of our sewage plants, people may see their sewage bills going up. In extreme cases, as happened recently in one major city, new connections may have to stop until the necessary improvements are made. The imposition of expanded federal drinking water standards requiring increases in monitoring costs for local governments may result in water bill increases in many communities.

Perhaps the most widespread of these more personal impacts will occur in the thousands of communities affected by our programs to control hazardous waste. We must decide how much to clean up Superfund sites and where to treat, store and dispose of the more than 250 million tons of hazardous waste we produce each year. These decisions are site-specific. They may change from site to site, depending on unique site characteristics of each. In every instance, however, there is a concerned community that will be affected by what happens.

With that potential to affect people, the obligation to focus our resources to achieve important environmental

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results should be obvious. But it isn't that simple.

In the first place, we always—*always*—underestimate the complexity of the environmental problem we want to control and the difficulty of operating the control program. In other words, what comes out of a committee room in Washington as a mandate often has little connection with what comes out of some pipe in Ohio. I consider this to be one of the greatest lessons that can be derived from fifteen years of Federal environmental protection efforts.

In the second place, EPA is not so much a coherent national program to manage pollution as it is a reflection of the success that many independent interests have had in getting their positions established in the law. There are air interests, drinking water interests, fish interests, and interests devoted to particular diseases.

There is the regulated community, of course, with another host of interests. And the pollution control industry, a new big business, has interests of its own. Carried to the extreme, the success of these interests could burden EPA with a set of mandates so vast that no resource base within the realm of economic reason could possibly carry all of them out.

We must choose to do the things that seem to us to be important, and do them well. We must tell people why we think they are important and why we didn't do other things we think are less important.

This is a sure recipe for getting flak, since the interests that your priorities have served take it for granted, and the interests you have not served pillory you for neglect. But the alternative is to pretend to do all the things we are on the hook for doing, and set up programs that create a lot of sound and fury without really accomplishing much. Nobody at EPA wants to do that.

What, then, are some of the important problems? Where do we think our efforts must be concentrated over the next four years to achieve the maximum environmental improvement? Such efforts must involve taking fresh looks at the problems of the older programs that form the backbone of EPA. They also include ensuring that some of the newer ones are making progress in real environmental terms.

Sewage treatment is important. We have spent nearly \$40 billion on this program. The good news is that a steadily increasing percentage of Americans are being served by adequate treatment; 57 million people have been added to the system since 1972.

However, 13% of the 3600 largest systems do not comply with their permits. Others are overloaded or subject to frequent breakdowns. Many communities have chosen not to, or are not able to, operate and maintain their plants properly.

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In addition, in order to meet the legal requirement for universal secondary treatment there remains billions of dollars worth of new construction needs. But half of this "unmet need" exists on streams that meet water quality standards already. Is this a good investment? If so, who should make it?

Our efforts in this area will be focused on stiffening our enforcement against municipal facilities, and providing technical advice to the states on operation and maintenance problems. Additionally, we must do this while exploring ways for converting the federal construction grants program to something states and localities can manage on their own. It was never intended to be a permanent federal program.

Controlling ozone and the other major air pollutants is another important area. While I appreciate the concern about more exotic toxic air pollutants, we should not forget that controlling the criteria pollutants remains the best way of preventing public health and property damage from the effects of air pollution.

There are still 54 urban areas that clearly do not meet ozone standards and 72 areas that do not meet carbon monoxide standards. We have until 1987 to bring all of them into compliance. Also, we are starting to see that our basic strategy for dealing with these pollutants, a strategy that assumes that the major environmental effects are in the airshed where they are released, may be mistaken in some important cases. We may have to start taking a regional view when establishing pollutant limitations.

It is now also becoming apparent that atmospheric chemistry is far more complicated than we imagined only a few years ago. Many pollutants interact; changing the level of one may decrease or increase the level of another. Part of the difficulty we have faced in deciding on the best way to deal with the acid rain issue is only the most familiar of these problems. There are others.

We intend to take this new understanding into account as we work with the states over the next four years. Naturally, we hope that they are also taken into account as Congress considers reauthorization of the Clean Air Act.

Non-point source water pollution — another important area. If we don't do something about this kind of water pollution, which comes from drainage off farms and urban areas, then on many water bodies we will never reach the ambitious goals of the Clean Water Act. It won't matter how hard we clamp down on point sources such as industrial outflows, the water will stay dirty.

Dealing successfully with this kind of water pollution is a much more difficult matter than establishing required control technologies for industrial plants.

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Successful attacks must vary with locality and often involve changes in land use or agricultural practices.

What we do about non-point pollution will have an enormous impact on the nation's wetlands—and wetlands are important. They are the most productive areas for a host of environmental values. In the past two centuries we have converted about half of America's original body of wetlands in the lower 48 states to other uses.

While we have been successful in protecting some particularly critical wetlands, it remains a fact that Federal, state and local programs do not deal with wetlands consistently. Some may encourage conversion while others try to halt it. At EPA, decisions affecting wetlands are typically made case-by-case, without an adequate strategic context, and they consume inordinate amounts of time and effort.

I have the sense that we are observing an enormously important part of our heritage being nibbled away without us taking the time to state how we would like it to be, now and into the indefinite future. We need a strategy that incorporates an analytic basis for making decisions about wetlands so that EPA's activities in this area will make long-term sense.

Finally, we have the problem whose apparent importance has eclipsed that of all others in recent years—what to do about toxic substances and all that hazardous waste.

I think we recognize that nothing is more critical than continuing and completing our review of all existing chemical and pesticide products. We must ensure that our most stringent health-based standards are complied with. At the same time we cannot neglect the thorough review of new products proposed for the market.

As far as hazardous waste is concerned, I am beginning to sense a change in attitude on the Superfund side of this issue reflected in the kinds of questions we have been getting from Congress. I believe this is the result of our increased understanding of the dimensions and complexity of the problem.

In its recent report, the Office of Technology Assessment came to an important realization, one that we in EPA had reached through first-hand experience. It is that our clean-up program is operating on the cutting edge of pollution control technology. Each site presents a complex and unique problem, whose solution strains current analytic tools.

Although we do not want to slow the momentum of the Superfund program, we must realize that we run the risk of serious errors if we try to force technical solutions at sites where they are really not appropriate. OTA recognized that it makes little economic or

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environmental sense to undertake costly long-term clean-up projects until we are sure that we have the technology to do it right.

Of course, we must continue to locate immediate environmental and public health threats and deal with them effectively, which is what we have been concentrating on. Our proposed extension of Superfund will enable us to continue with these important actions.

If Congress keeps this in mind, I think we will get a better reauthorization than we could have expected a year ago. And four years hence we will have a good chance of saying that this seemingly intractable problem is under adequate social control.

On the RCRA side, we have created a program that is going to rattle through the entire economy of this country like a golf ball down a drain pipe. We generate over 250 million tons of hazardous wastes every year. During the next four years I would like to see us settle the debate about whether, where and when we should bury it, burn it, detoxify it, shoot it down a well, or stop it from being produced at all. I would like to see us make these decisions, and those connected with Superfund remedial action, on the basis of solid analysis of the risks and costs involved in all the options.

Additionally, I believe we need to pay a lot more attention to community relations in those places most affected by hazardous wastes, in the belief that local people can help us make intelligent risk management decisions when we share the available information with them. For that matter, citizens can contribute to making better decisions in all environmental areas. I intend to stress community involvement in each of our line programs.

I have been talking about concentrating on the important problems, but just as important is the manner in which we exercise this concentration. It is by now well known that pollution can move among the environmental media—from air to water, from surface water to groundwater, from water to soil, and so on.

But EPA is composed of individual programs, each carrying out a particular statutory mandate. These are typically focused on individual media. It is understandable that someone under the gun for instituting water cleanup may not have paid the closest attention to the effect on the air resulting from that cleanup. But someone should have. From now on, someone will.

Let me give you a few examples. I mentioned non-point source pollution as a priority. One way of preventing pollution of surface water from agricultural run-off is to institute certain management practices designed to keep water on the land for a longer time, so

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that it will soak into the soil. But when it soaks into the soil it carries with it the whole chemical brew—pesticides, fertilizers, herbicides—that we use to keep our farms productive. We now have a pesticide-in-groundwater problem of unknown proportions. Obviously, anything we do to correct non-point-source pollution will have to take this transfer into account.

I also mentioned the importance of controlling criteria pollutants. Look at the foundry industry. This is a classic “smokestack” industry where we have done a good job in controlling these pollutants. Now the foundry industry has a serious water pollution problem, over eighty percent of which, in some foundries, comes from the wet scrubbers we mandated to control the air pollution.

Finally, I mentioned the importance of improving sewage plant performance. *I will add that the settling ponds and lagoons used in many of these plants are, in a number of industrial areas, a significant source of toxic air pollutants. The toxics come from industrial plants that discharge into the sewer system.*

We will be able to control much of this problem through pre-treatment—the removal of the toxic material at the source. But if you have followed my argument you can see that this is yet another inter-media transfer—from water into hazardous “solid” waste, which will have to be disposed of in some way.

This circle game has to stop. It is expensive. At best it is misleading—we think we are solving a problem and we aren’t. At worst, it is perverse—it may increase rather than reduce pollution risks. It seems to me that the solution to this problem is the consistent application across all Agency programs of what we have been calling risk management.

Reducing risk—to human health and environmental values—is after all the reason we remove pollutants from the environment. It is the currency of our business. By closely watching the movement of pollutants that results from regulatory options and calculating the attendant risks for each we can assure the public that our actions are indeed connected with a measureable, permanent good.

Of course, once you start working with a risk currency, EPA becomes something more than the sum of its programs. We can start looking at the risk-reduction potential of the various programs and directing resources where this potential appears to be greatest. We intend to begin doing this as a normal part of our budgetary process in the coming years.

The approach has, of course, some obvious problems. It is relatively easy to compare the risk of a single public



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health effect delivered via two different media. We can agree that a one in a million chance of getting cancer from drinking water is pretty much equal to the same chance of getting it through breathing something in the air. But what about comparing the chance of human disease with the chance of harming the marine environment?

I'll give you a concrete example. Let us say that if you incinerate particularly toxic wastes on land there is always some residual risk to the surrounding human population. If you incinerate at sea, that risk virtually disappears. But there is a quite small though still calculable possibility that something could happen to the incineration ship, with unpredictable effects on marine organisms. *Do you allow the ship to sail?*

I can't see how you could solve dilemmas such as this without a lot of information on risks, costs and probabilities, and without the ability to respond flexibly, depending on what that information yielded. Most important, you need that kind of information to communicate to the public how the decision was made, what your values are, and how you balanced all the factors involved.

In summary, then, I see a four-point environmental management plan emerging over the next four years. First we will make sure that our priorities are those that can have important environmental results. We will take steps to ensure that measuring those results becomes a central part of Agency management. Over the next few years I want to complement and in some cases replace the largely administrative measures in our internal accountability system with indicators of environmental progress for each program.

Second, we will continue the strong movement envisioned in our environmental statutes to decentralize our programs and delegate additional responsibility to Regions and States. Environmental protection is too large a dog to be wagged by a tail clutched in Washington. We intend to do everything we can to increase the flexibility with which states and localities may implement Federal standards. We will also strengthen our technical support and oversight role. We must continue to change policies and long-standing practices that impede this movement.

In this regard, we will continue our efforts to collect information on risk in particular areas subject to unusual environmental stress. Such information gives us the ability to work with states and localities to tailor environmental solutions to the varying needs of different geographical areas. We have launched a number of projects aimed at giving states and localities the kind of information they need to make intelligent risk management decisions.

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community involvement and public participation. At present, we require a detailed community relations plan for all Superfund sites. We have recommended that this be embodied in law. I have also asked that all the line programs develop community relations and public outreach strategies. If what we are doing makes sense, we ought to be able to communicate that to the grass roots better than we have in the past. We must also establish forums that consistently provide input to us from the public as we make decisions which affect peoples' lives.

Finally, we must plan control solutions with a multimedia perspective. We have to reduce risk and not merely transfer it. Building an integrated management structure at EPA will not be easy. But we have some of the elements in place, and we have the will to do it. We must focus our resources on the most important problems, and fix them so that they stay fixed.

And we can't do that without some kind of measurable risk management integrated across environmental media. We can't do that without the knowledgeable participation of states and localities. Most of all, we can't do that without strong public support.

Thank you.