

Document Log

From	To
John Sager/DC/USEPA/US	Elizabeth Olenbush <olenbush@bcn.net> Paul Ruesch/R5/USEPA/US@EPA Elizabeth Olenbush
CC	BCC
Richard Kinch/DC/USEPA/US@EPA Mimi Guernica/DC/USEPA/US@EPA	
Subject	
foundry sands meeting presentation	10/30/2003 04:55 PM

Document Body

Elizabeth and Paul,

Attached is my presentation. In response to your comments, Elizabeth, please note that I deleted the reference to high risk; Paul, please note that I added a fuller list of potential projects for discussion.

John

Elizabeth Olenbush
<olenbush@bcn.net>
10/30/03 02:19 PM

To:
cc:
Subject:

John Sager/DC/USEPA/US@EPA
Re: draft presentation

John:

Sigh. No, of course not, so leave it the way it is. But it is this exact -- and erroneous -- perception that is SO frustrating to industry because it is not based on fact. It is simply not true that "significant" portions of foundry sands are hazardous wastes. But we cannot overcome the perception with reality if OSW folks are unwilling to engage both in dialogue and in funding third party research, if needed, to gather and analyze data. We can't even get OSW to document WHY they have developed this perception.

Having vented on that point, obviously we are all hoping that next week's meetings provide a point of departure for a new and constructive dialogue with the agency that will replace perception with fact and lead to areas of consensus. If further research is needed to make people comfortable, then we should be addressing ourselves to that issue rather than allowing perception to guide policy.

Elizabeth

At 11:54 AM 10/30/2003 -0500, you wrote:

>Regarding your comment that my characterization of the range of risks
>posed by foundry sands--from "low (or none) to high"--might cause some
>hysterics over use of the word "high", would you prefer that the range
>be described as from "clean to hazardous"? Right or wrong, there is a
>perception in my office of regulators that there is a significant
>portion of sands that are hazardous wastes, and I think this is a
>significant obstacle for the the industry to overcome in trying to
>promote reuse.

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Elizabeth

Olenbush

To: John

> Sager/DC/USEPA/US@EPA

<olenbush@bcn.net

cc: Paul

> Ruesch/R5/USEPA/US@EPA

>

Subject: Re: draft

> presentation

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>John, I looked this over very quickly. Most significant comment I have

>is

>the title: we really don't refer to a "foundry sands industry".

>Probably

>better to refer to Foundry Industry in the context of building

>partnerships. Other comments: Slide 7: some in industry will have

>hysterics about comment that sands are "high" risk -- they would

>interpret

>this line as currently phrased to mean that the very small (less than
>2
>%)
>of potentially hazardous sands -- from leaded brass or bronze
>foundries
>-- continues to permeate the thinking of the regulators at all
>levels. Yes, we acknowledge that there is a VERY small proportion of
>foundry sands that are totally inappropriate for beneficial use but
>the
>focus of our mutual activities needs to be on the higher volumes of
>material that CAN be approved for a variety of beneficial uses. Pg.
>11:
>
>beneficial misspelled.
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>
>At 04:28 PM 10/29/2003 -0500, sager.john@epamail.epa.gov wrote:
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>
> >Attached is an unedited powerpoint presentation that I wrote this
> >afternoon for the Monday meeting. Paul and I are scheduled to go
>over
> >our presentations together at 2 PM tomorrow. Comments before then
>would
> >be appreciated.
> >
> >(See attached file: EXPLORING PARTNERSHIP OPPORTUNITIES.ppt)