



Georgia Industry Environmental Coalition

November 2, 2001

The Honorable Carol Jackson  
Co-Chair, Joint Hazardous Site Response Act Reauthorization Study Committee  
PO Box 2246  
Cleveland, Georgia 30528

The Honorable Tom E. Shanahan  
Co-Chair, Joint Hazardous Site Response Act Reauthorization Study Committee  
PO Box 1298  
Calhoun, Georgia 30703-1298

SUBJECT: EPD Letter of October 25 Concerning GIEC White Paper  
"Making HSRA Cost Effective... Still Protective"

Dear Senator Jackson and Representative Shanahan:

GIEC is in receipt of a letter sent to you by EPD Director Harold Reheis in response to the White Paper GIEC submitted to the Joint Hazardous Site Response Act Reauthorization Study Committee. As evidenced in the EPD response, clearly there are differences over the HSRA program between the regulated community and the regulators. Still we believe, in the end, that the goal of environmental protection is one shared by both EPD and business and industry. GIEC hopes that EPD will work with the regulated community in an effort to bridge this gap. In any event, we stand by the White Paper.

One area of agreement with EPD is on the subject of "Brownfields". We endorse EPD's proposed amendments to the Hazardous Site Reuse and Redevelopment Act. Such amendments are a step in the right direction, although it remains to be seen how much of a Brownfield's incentive a soil-only approach will ultimately provide.

The authorizing legislation (HR174) asks the Study Committee to "determine what improvements might allow for more cost effective results". To help the Study Committee fulfill this mandate, GIEC has recommended statutory changes (Appendix A of the White Paper) that would effect the necessary improvements. While the technical points presented in the White Paper are important, we ask that you turn your attention to the statutory changes in Appendix A. We hope you will give these proposed changes a full airing and consideration in your deliberations. If time is too short for such consideration, we urge you to make further review of HSRA's cost effectiveness part of your recommendations to the legislature.

We believe the unnecessarily high costs of the current HSRA program are unsustainable in the long run. Other states, as well as the U.S. Environmental Protection Agency, have revised their programs in the light of experience and advancing knowledge. GIEC believes it is time for Georgia to do the same.

Thank you for your consideration of these issues. As always, we would be happy to engage in further dialog at any time.

Best regards,

GEORGIA INDUSTRY ENVIRONMENTAL COALITION

Terry D. Snell  
Chair

cc: Members of the Joint Hazardous Site Response Act Reauthorization Study Committee  
H. Reheis  
Members of the DNR Board