LINDA GREER

Director of the Natural Resources Defense Council's Environment and Health Program and Former Staff Scientist for the Environmental Defense Fund

Interview Date: September 13, 2005
Location: Washington, DC

EPA Interviewer: For the record, this is an interview with Linda Greer, currently the Health Program Director for the Natural Resources Defense Council in Washington, DC. We're conducting the interview on September 13, 2005, for an oral history project in conjunction with the 25th anniversary of Superfund, which will occur later this year. Let me begin, just by asking whether your current position allows you to include some focus on the Superfund program and issues.

Greer: Well, I do still work on toxic chemical pollution. I don't really work much on the Superfund program. I brush up against contamination issues here and again, either RCRA [Resource Conservation and Recovery Act] or Superfund, but for the most part I don't work on Superfund anymore.

EPA Interviewer: OK, when did you first start working on Superfund-specific issues?

Greer: 1981. I actually came into the environmental community into the NGO [non-governmental organization] movement to work on Superfund, and that was really early in the life of the Superfund law. So I really did get in right when the whole process was rolling forward, and one of my very first days at the job was going to a hearing that was being held by the Energy and Commerce Committee in the House of Representatives and you know, my job was essentially to run the slide projector while my boss gave testimony about the first—I think it was 20 or so—sites that were the focus of Superfund before we really had a long list of the sites on the NPL [National Priorities List]. One of my very first experiences as an advocate was watching that John Dingell oversight into how things were coming together at the very beginning of Superfund.

EPA Interviewer: What group were you affiliated with then?

Greer: At that time, I came to town and started this line of work at the Environmental Defense Fund, now called Environmental Defense, and we had, in 1981, three or four people working just on Superfund, which is enormous when you think about it. The environmental community doesn't have three or four people working on very many things at all, and so we were a team of people that had worked first, I think, just at Love Canal before

I got to Environment Defense Fund, and then moving forward to create a federal program to address these sorts of sites.

EPA Interviewer: Did you start as an advocate up in New York near Love Canal?

Greer: No, I started here in Washington as a scientist to do policy work. You know with the team.

EPA Interviewer: What kinds of issues were you particularly focusing on then?

Greer: Well, I had two major areas of focus. First was cleanup technologies. This is way, way in the day, way before we were really sophisticated about how you could clean up these sites and how you could even detect contamination at a site. We put together a book that was meant to be for activists, and people who lived around the plants to describe to them the various types of technologies that were available to address contamination at their sites. We had begun to look at the problem of containment versus permanent treatment without using that kind of language, because that language really wasn't around yet. So one of my big focuses was collecting information about how would one go about doing a good job of cleaning up some of these sites, and what would the issues be. Then my other job was having to do with cleanup standards, and how clean is clean. So I jumped naively right into the fire on two issues that essentially never went away for the entire time I worked in the Superfund program, because they stayed contentious, you know, the whole time.

EPA Interviewer: That's fascinating. Do you still have a copy of that booklet?

Greer: I have it somewhere. I'm looking in my bookshelf and I don't see it right there. I may have it—I can dig it out for you.

EPA Interviewer: We would love a copy. Perhaps we could scan it into the computer, and let people see the difference between what was in existence way back in the early 1980s versus the tremendous leaps that have taken place, particularly in technology.

Greer: That's a great idea. It was called… I remember, it had the most boring title: *Dump Site Cleanups, a Citizen's Guide to the Superfund Program.* I mean, are you still awake? But we were very proud that we had these little cartoon-type figures for each chapter—active people doing things. That was our only actually artistic, creative edge to the entire book, I would say. But it was very successful, popular book with grassroots communities and we published it as a loose-leaf notebook so that people could actually, literally take everything out and just Xerox it on a machine and have another copy. Because we really wanted to spread it around, and didn't have, you know, the money to print thousands and thousands of copies, so that's how we handled that problem before we had electronic e-mail file systems.

EPA Interviewer: Tell me a little bit about the citizens you worked with, and Environmental Defense has always been known as a grassroots movement and Superfund as well is very much a grassroots movement. So, talk a little bit how it was to be involved from that side in the early days.

Greer: It was really a life-changing experience for me to meet and work with these people who lived around these sites, because I think you're being kind to say that the Environmental Defense was really grassroots oriented. I don't think we were at that time and I still don't think that many of the national environmental groups are particularly focused on grassroots problems the way that they could be. Because, you know, we were highly trained scientists and lawyers doing sort of white-collar jobs in this town as opposed to being people who had the misfortune of raising their families right in a place of high contamination, and most of those people don't have any sort of technical or legal background to try to cope with the bureaucracy associated with this problem or the basic facts of the matter in terms of what is a bad chemical, what is a bad level. You know, it's extremely frightening to know that you are living in a contaminated environment and all that can be done about this is not under your direct control.

So I met people who had been, who had been sort of thrust into these incredible leadership positions, usually not exactly by choice, you know, just out of frustration that somebody had to do something about this problem, and they were just amazing people. They were natural born leaders. They could see how to try to move things forward. They learned on their own how to pressure their Mayor, or how to get in touch with their Representatives. It was all trial by fire. None of these people came to these jobs having gotten interested in activism or advocacy or social change, or anything, you know, all these people were people who just lived near a dump. So it was a real kind of interesting… You know, you sort of crack this thing open and what do you see?

It was really interesting and for me, I was very young, at the time. I just finished my Master's degree. I was probably a 23, 24 years old. I was so inspired by these people. I never met anybody who had so risen to the occasion as something that was presented to them. One of the things that so struck me at the beginning was, here these were people who did something else for a living—these were not people who were working on cleaning up the dump site for a living. I felt like I had this luxurious position that I was actually being paid, although not very well, I was being paid to try to work on this problem, and these people were doing this when they came home from work or on their Sundays. You know some families even had two jobs to try to make ends meet. I was just so inspired that people would dedicate their lives to this. But of course, they felt like they had no choice and that this was the only way that anything was ever going to happen. And they were probably right about that. The more I saw, the more right I thought they were about that. So it was probably a shaping moment for me personally, and for I think a number of the activists who worked on this issue in Washington, because it was so about particular people in particular places as opposed to some of the other stuff that people work on.

EPA Interviewer: Is there a particular site or particular story that comes to mind when you think about the kind of involvement you're talking about; people who had to learn overnight what chemistry was and toxicology?

Greer: Yeah, one of the first people I think of is Penny Newman. She's at the Stringfellow site, and she's still to this day an activist on Superfund issues, as well as other things. And I think she's just the prototype of the person I am talking about, you know, where this was just all thrust upon her and she never stopped working on this, and she was inspiring to me

because she would find experts across the nation. She would pick up the phone and call them; she would make it her business to try to bring together the sorts of people that could make something happen at Stringfellow acid pits. She really became extremely sophisticated on all aspects having to do with this problem, and she became a person who rose within the field of activism to really stick with trying to help other people at other sites, etc. And so she was one of my sort of earliest inspirations on this.

EPA Interviewer: She's one of the people we are interviewing as well as part of this anniversary project. Maybe folks who are listening to this will want to jump over and listen to her stories about the Stringfellow site. During this time, a lot of what occurred was due to the waste management practices and the practice of dumping things on the ground or dumping things in a flood plain, and you said you worked on helping to get technologies developed. Talk a little about technology development and innovative technologies and the Superfund program.

Greer: Well, you know, I think at the outset there was a little bit of wishful thinking that just clay caps were going to take care of the problem. I remember early on just reading about things like well rodents are going to dig holes in these things, and trees are going to grow on top, and their roots are going to go down. I kept thinking, "Gosh, you know this seems so primitive, you know this just doesn't seem like this is really going to last." It was clear that we didn't have the institutional longevity to keep all the rodents out or to keep the trees from growing. We didn't even have—and I remember making the point that we didn't even have—the certain institutional structure that one has at a cemetery to keep the grass mowed, let alone make sure that these things were going to work in the long run.

And, of course, fairly early on places would experience a 50-year flood or a super-duper rain storm where some little, small disaster would strike and it would become just glaringly obvious that this was just not going to be the way to go, and so I think it was a natural evolution in the program that both EPA and the state officials started to think we need to –we really need to find other technologies to help clean up the program. I think that really became one of the big pushes from the activists on site who of course didn't want to live across the street from this stuff, and from the environmental community here in town and at the state level saying, "You know, you need to be requiring permanent technology wherever it is possible and that that requirement would hopefully sort of jump start the development of technologies to address the problem."

We always had going against us the expense associated with doing permanent things, and we also had going against us the fact that a first and foremost permanent technology was incineration, which was very unpopular at the places where people were living. Who wants to go from living, sitting next door to this stuff, living breathing while you watch the plume go up the stack? I mean, it's perfectly logical that that would not be a popular "permanent" remedy because in the short term, it's just all about more exposure than you had in the first place.

So it was a bumpy road, the road to pushing technologies. You know from my perspective, the best thing that ever came along in many ways was vacuum extraction. That was finally a technology that looked like it could really work, actually took the chemicals out of

the ground if they had volatile chemicals, and no one would expose in the meantime, because it sucked it all up into this little octopus and they took it all away, and then wherever that went was another problem. So that was to me the ultimate in permanent technologies, because it wasn't so expensive so the Agency could really apply it, and then it didn't mean more exposure for the community there.

On the other hand, the currently favored status of what's called natural attenuation—I have nothing but cynicism about what that is really all about. I just think that is a thin veneer of frosting on a rotten cake that is just letting the contamination sit there and we could all hope that it will attenuate away in twelve lifetimes. So there is sort of that…There's the world of permanent treatment or treatment as it's sort of a checkerboard of experience as to whether or not really at the end of the day citizens even today are getting the sorts of remedy they really could. You know, I think in the end that we should have developed much better technology than we even have today still, you know, in order to really truly address some of the contaminants at these sites in a permanent fashion…

EPA Interviewer: That was a big issue in the 1986…

Greer: Yeah.

EPA Interviewer: …remedy selection debates. To what extent would remedies have to be permanent, to what extent would treatment be required, what position would innovative technology use, have?

Greer: Right. And that was a huge debate in the halls of Congress and within all the policy leaders, and that's actually… It is a good example. If you ever give people examples of how legislation gets made in Congress—if you want to go beyond that crazy saying about you don't want to watch it, it's like sausage or whatever that is—that is the example to look at of how people hammer away at words, at nouns, and verbs, and adjectives, until they have struck a balance that somehow people are going to live with. So the balance there was, sort of the permanent remedies, wherever they were—I forget the exact language—wherever they were feasible, or where they were cost effective.

EPA Interviewer: To the maximum extent practicable.

Greer: Yeah, that's what it was. How could I forget? And the idea that not everything would get a permanent remedy, just the most contaminated areas—sort of a hot spot approach to these permanent remedies—so that you get the worst of it away with the most costly technology, but, you know, leave some of it still behind if it is not practicable to take it away. So it was always a very delicate balance in the lot.

EPA Interviewer: And here it is almost 20 years later, and that provision is still in the law. Do you have any occasion to see how it's working today?

Greer: Well, you know, it is interesting. Not today. We looked—though many, many years after the law was passed, you know when we first did the 1986 amendments, I probably stayed active in Superfund through, you know, the early 1990s. We were not satisfied

actually with the way the language of the law was being implemented, and probably we would be less satisfied today, to tell you the truth, because I think there has been less scrutiny over the past five tears or so on the cleanups than there used to be, in large part because the national organizations were no longer able to get money from philanthropic foundations to do Superfund work and we eventually sort of got starved out because we could only… NRDC, for example—I think we worked on Superfund for three or four years without any support whatsoever from anywhere and finally decided we had to move on to work on other things that would underwrite our salaries. So we sort of abandoned the program a bit—maybe abandoned is too strong of a term—but we had to give it less priority within our program areas.

EPA Interviewer: Do you have any idea why that support moved elsewhere?

Greer: I think… I don't have a really good idea, but I think it was because the… We always have a problem with the foundation community [in] that they only have so many years that they are interested in things anyway, and then they want to move on and do something new, which is understandable. On top of that, I think they got to feeling that there was a lot going wrong, up the pipeline on toxic chemical management, and that Superfund was the pathology department of medicine and that they wanted to go to work in pediatrics and try to keep people from getting sick in the first place and so there was a… I think what happened was that Superfund was such an example of what went wrong that many in the foundation community decided that their money would be better spent working to try to make it right.

You know, by the way, I'm not sure that we've been very effective in that, although we've been playing a very strong role in trying to improve first RCRA and then TSCA [Toxic Substances Control Act] and other sorts of regulatory programs about the management of chemicals, but that's turned out to be a very difficult world to operate in as well. The thing that I really feel bad about it is that for the people living at these sites, none of that really matters. All the prevention doesn't really matter, because "you have a site and that's your problem" is the legacy of previous mismanagement, so to speak, and so you're not really able to help those people; you're just trying to prevent other people from having the same situation that they have. I have to tell you, to be honest, it's very hard to look back at my own work, even for the past—I don't know—five or more years and feel like you're really doing something that's going to help prevent creation of future Superfund sites. Ah, but hopefully, the pendulum will swing the other way.

EPA Interviewer: Prevention is always so difficult because if you are successful, you don't see anything.

Greer: Yeah, yeah—although I think we would see something because we would see changes in TRI [Toxic Release Inventory] numbers and we would see—we could see if we were successful, and we could see certain chemicals get taken off the market. Yeah, we have very tangible things we would love to see, but now is not the time, I don't think, for these sorts of programs to really be able to be effective.

EPA Interviewer: I understand what you're saying. Let's go back to the early 1990s, and at that point the 1986 amendments had expired and there was a lot of contention on the

enforcement provisions, on the cleanup provisions, on a lot that was going on. I believe you were a part of what was called the National Commission on Superfund. Could you talk a little bit about that?

Greer: That was…a real milestone for the whole community working on Superfund was the National Commission on Superfund. I had done a number of other negotiations with diverse parties already by the early 1990s, but this one was really probably the biggest one I had ever done. It was unusual because it was the A-team, so to speak, [who] was the CEO-level people who were sitting at the table and then the B-team was their staffer. So I had my Executive Director, John Adams, as my CEO, which I always was kind of tickled that he…

EPA Interviewer: Were you with Environmental Defense?

Greer: No, I was with NRDC [Natural Resources Defense Council] by now. I came to NRDC in 1991, or maybe 1990—I think I came in 1990. John Adams was my man and sitting up in the table there, and, you know, it was like a Congressional hearing, you know. The aide sits right behind and feeds stuff, and the staffers. We had our own group because we were doing all the work products that then we would give to our bosses and our bosses would negotiate, and then also at that table were the CEO's of chemical companies.

Although we had worked actively with the Washington representatives for many companies and we had occasionally had some casual working relationships with the Senior Vice President for Environmental-such-and-such at these companies, we had never actually worked with the people who ran the business of the company. It was remarkable actually in sort of a—if you want to know whether Superfund—it was an important program to these companies, you only have to think that these CEO's chose to spend their time on the Superfund Commission. It shows you that this program really did have their attention and they felt that there was a lot at stake in the success and the outcome of the program, and then, of course, we had people on the Commission who were citizens who lived at sites who were some of these people who had dedicated their lives to trying to fix their own site and try to fix the program.

It was an amazing collection of the top of the heap "haves" and, in many ways, not the bottom of the heap, but the people who are the "have nots." Many of the CEOs, I think for them—I hope you get to interview at least one of them—because for them, they are usually up in their ivory tower receiving only reports on a certain heavy weight paper of a certain font. Here they are in a place with a bunch of ragtag people that were, I'm sure, like nothing they had ever experienced.

So some of the moments of that Commission that I remember were… My most vivid moment of that Commission was the meeting that we had, actually in New Orleans, and we had the meeting there because we brought a panel of activists in from the southeast, so that was sort of a handy place to do it. And so we brought people who were *really* suffering—their own health, the health of their own families—who had these horrible stories to tell about where their housing developments had wound up and the way that they had been treated by everyone from the Mayor on up. I just think that was so upsetting to the CEOs as people that that was the day of the Commission that things moved. The industry decided they needed to

try to fix this problem, because of these really tremendous presentations from people who lived in dump sites. They [industry] were, I think, so disturbed by that personally, that they kind of stopped listening to their staff about what the Chemical Manufacturer's Association's (CMA) positions was on blah blah, and they reacted just as humans to these stories. So that was, I think, the turning point moment of the Commission.

We had been meeting already for a while and we had millions of position papers and everything was sort of congealing a little bit, but I think following the meeting in New Orleans was the time that something clicked on that side. They started making more movement towards actually trying to contribute to fixing the program instead of just trying to think about their own problem of what they didn't want to spend or what their sites were. They had a very inwardly focused view of what their job was on the Commission, which was to protect the interests of whichever company we're talking about. But after that meeting in New Orleans, they got drawn into the idea that they were in a position to try to fix this problem for this country. They kind of rose to the occasion, at least temporarily and long enough, that we made real progress on the Commission to come up with a set of practical recommendations that I think would have really done a lot actually to help out the program. That's one of my best memories of that.

I also remember another meeting that we had, which was at this really fancy hotel that's right near the United Nations in Manhattan, and we were up on the 40th floor in this really fancy dining room, the likes of which people in the nonprofit community—it's not where I stay when I go to New York… [*Laughing*] I had the CEO of a company and we were having dinner—this beautiful dinner—and it's like the fanciest wedding you've ever been to, basically. Anyway, the CEO of some chemical company over here, and I had an activist from one of those sites over here and I just thought, isn't this just like America—you know, it's just like I felt like... It was almost like you had to be bilingual to imagine the road that this person was on and the road that this [other] person was on. As I had one sort of conversation over here and a completely different conversation to the other side, I just thought, "This is just crazy!" But it was that mixture of personalities on the Commission and, I think, the good work of the facilitators in identifying the people who could be brought together and make this happen and make it a unique negotiation.

EPA Interviewer: It was very much consensus oriented. Not just, "Can I live with this," but to the point where people could endorse it and the positions taken, as I recall, came very, very close to becoming law.

Greer: They came very close; that was an interesting moment. There's one other thing that I think is important about the product that came out of that Commission that is unlike many products that come out of negotiations. I've had a lot of experience with this and I have to tell you, I am really very wary now of most negotiation processes, because nine out of 10 don't deliver a practical result. The reason I think is what you were just mentioning—the "Can you live with this?" question is not the right question and most products are internally inconsistent. I'm thinking, for example, for Enterprise for the Environment—that big negotiation that we had a few years subsequently with many of the same players, by the way, as people who were on the Superfund Commission—that started with, I think, a small goodwill quotient that some people already knew each other. There, I still remember, NRDC at the end did not sign onto

that document despite, I can't tell you how many hours. There were 12 recommendations up at the front, the summary, and the fact of the matter was, there was no way to have all 12. If you were going to do number one, you couldn't do, for example, number five. They were internally not consistent with each other.

The thing about the Superfund Commission product was, that product actually was a functioning product. You could implement the Commission recommendations and not have any crazy inconsistency. Things that, by the time the Agency got it, people wouldn't be scratching their heads saying, "What are these people thinking? I can't do this at the same time I do that!" We didn't have any of that because it was truly an expert product. The Commission [was] with people that really actually knew what they were doing, and that was another reason it was so unique. So it was a terrible disappointment at the end of the day when—and I guess that's, you know, just another lesson that you learn—that it was not adopted. It was not even really taken for a serious ride in the halls of Congress.

It's always easy to do your Monday morning quarterbacking about how that game went wrong. I don't really know exactly why we did as badly as we did once we cracked out what we thought was just the niftiest product out there, because we had been pretty inclusive. We had met privately but we had brought in certain Congressmen and Senators along the way to have lunch with us, to learn about what we were doing so that we didn't look like we came from Mars. We had been speaking with other colleagues from our worlds who weren't part of the Commission per se. I know that the chemical guys were talking to people over at CMA and elsewhere (ACC [American Chemistry Council] now), so we weren't oblivious to the fact that there were many players not within the inner circle who needed to be aware and hopefully positively inclined towards the work that the Superfund Commission was trying to do.

But we just skidded right out. We skidded right out. It was amazing to me that this thing just got up there as though it was just yet another interest group's position paper as opposed to what we thought was the special thing that it was. And so it was really demoralizing actually, but it had such a short half-life as a working document up there. For a lot of people, myself included, I felt like, "You know what? If this doesn't work, nothing's going to work up there. If we can't make this help Congress move forward to reauthorize the Superfund program, I just don't see what's going to work." I think we all lost our enthusiasm for going back either unilaterally on our own or trying again, because we all felt like this was our best effort, and there wasn't anything I could think of to do beyond that that was going to click any better than that one did.

EPA Interviewer: And for years, that, indeed, was true. Reauthorization attempt after attempt failed miserably…

Greer: You know, I told people…

EPA Interviewer: …and became more polarized.

Greer: Exactly and I told people, this was exactly like that movie "Groundhog Day." You just did the same thing over and over again. I could have played the role of any of the parties in a

lobbying meeting because you knew exactly what they were going to say, you knew exactly what you were going to say back, you knew exactly what the aide was going to say about what the two of you said and it was just stultifying, because there was just nothing that was going to make this move forward. The thing about "Groundhog Day" is in the end, the guy figures out what his mistakes were and that's what happens. But that wasn't happening to us. We were just like at the beginning of the movie where you just keep stepping in that puddle and you keep pissing off the guy in the store and we just kept doing the same thing over and over again. [*Laughing*]

EPA Interviewer: And yet, one of the areas that I think you were perhaps very much involved in that has taken hold is the whole view of risk assessment and risk management, and I'd like you to talk a little bit about Superfund being one of the first programs where we did have risk management as the decision-making tool as opposed to specific standards and a little bit about how that developed and how you've seen it grow and mature or immature as the case may be.

Greer: Right. Well, I am probably not going to say what you wish I would say about this, because I've got to tell you, I started out from the perspective that I really thought that we needed to have national standards, and I ended up in the perspective that we really needed to have national standards and I went along a long road of watching risk assessments and risk management. I don't even like to use that term any more.

I think in the end that the problem we have with risk assessments is that you can torque the system to come up with the answer that you want—and this comes from someone who has read a lot of risk assessments and watched the way that different cleanup standards for individual sites get established. And in fact, we did a couple of reports on the Superfund program that would also probably be good for you to scan in if you are interested. One was called "Right Train, Wrong Track" and the other one was something else like that—I can't remember the name of the other one. We read dozens and dozens of records of decisions (RODs) and remedial investigations (RIs) and actually scanned through a lot of RODs. In fact, that work, when we first started doing that work, at that time Headquarters didn't even collect the RODs into Washington because it was such a decentralized program. Then when we started collecting them and then we started criticizing the Agency for inconsistencies in their decision-making, I think the Federal Government decided that they did need to run more of the program in a more centralized fashion. But these risk assessments that are still undertaken—they're probably, I don't know, maybe—they are worse than ever.

So much came to rest on the exposure assumptions that were going to go into the risk assessment and so much of the exposure assessments came to rest on whatever the poor risk assessor operating on his own at his desk was going to assume about how people were exposed to the site. You know, I remember risk assessment where the cleanup level was really so non-protective and it turned out that whole exposure assumption was that the only people that would ever be exposed were trespassers who were running for exercise at the site. This was literally, literally a guy with a hat and long pants and gloves and running through the Superfund site trespassing because he needed a place to exercise. And, you know—

EPA Interviewer: Of course we know all runners wear long pants and gloves. [*Laughing*]

Greer: I remember the Superfund site somewhere in Texas where children were assumed not to go onto the site because of fire ants, the presence of fire ants. I'm not making this up, I couldn't possibly. I remember calling down to the activists down there and saying, "Would your kids really not go there because of fire ants?" And she said, "Honey, if our kids didn't go out because of fire ants, they would never go outside! Those things are everywhere!" Those sorts of assumptions would lead to cleanup levels that were off by orders magnitude—10, 100, 1,000 times higher than somewhere else, all because of this site-specific risk assessment, "risk management." So in the end, I'm not here to say that we could achieve Superfund truly protective standards in all places, because I think that would cost as much as Hurricane Katrina to actually achieve. But, I'm back to thinking—and I actually never got too far off this to tell you the truth—I was willing to give this a small run for its money, but quickly became convinced that this was never going to work.

And the other problem with the risk assessment approach is that it's very inaccessible to people who live around the sites, and nowadays it's a thousand times worse. Nowadays the risk assessment process is actually inaccessible to me and I'm professional. I have a Ph.D., as I said earlier. I get paid for a living to do this work and many of the risk assessments are now run with large computer programs; some of the risk assessments that the Agency does, even use confidential modeling. Much of the input data that goes into the risk assessment is completely inaccessible, and that's from somebody who has the luxury to show up to do this for a living as opposed to somebody who lives there, doesn't have a science degree, etc.. It's become even less easy to point out the assumptions about, oh, it's just a trespasser running in the winter and it's no kids because of the fire ants, or it's this or it's that. All of this is buried now into these very inaccessible documents. And so now it's completely anti-Democratic as well as being very inconsistent.

So my thing about the standards was, for a long time, they might not be as protective as they need to be, but at least they would be fair. And the way that it is now I think is very unfair, and also in terms of how permanent the remedies are. I think it's still all about how hard you push as opposed to a system that is there to deliver protection to people without requiring them to really work for this on their own.

I have to say, it's funny that my whole Superfund experience was very radical for me politically. Because I really felt that what was happening in the Superfund program was that if people really wanted a protective remedy, they needed to work for it themselves. And that the government was not going to just protect people. There was a lot of reasons for it. It had to do with money, and it had to do with the industry there and it had to do with understaffing, or incompetence, or inconsistencies. There were a lot reasons for it. It wasn't like the government was waking up every morning saying, "We just don't care about those people." But the fact of the matter was that people were going to have to work for this themselves to get what they wanted.

And for as much as I so admired and admire the people who threw themselves into doing this work for themselves, their families, and their community, it's not an overstatement to say that for some of these people it actually ruined their lives. I would talk to them five

years into this struggle and they would be in tears over how frustrated they were about how it all was so illogical, it all was so unfair, they couldn't get the site to be cleaned up. They are still having these problems where they put their entire heart and soul, mind, all their money, all their time into this and there were certain people that they would just finally have to stop. They just couldn't go on. It was just horrible to watch that and to feel like there wasn't much more that we could do for those people, and so it was very radicalizing for a young adult to watch the inequity involved in this.

This is a difficult problem to solve, but it's not like sending a man to the moon; it's not that difficult. There were so many areas where it just seemed there wasn't a will. That there was a way; there just wasn't the will. There was so little that we could do or they could do to change the state of play. It's sort of like up against the big institutions and so here I am 50 years old and I'm still as—I'm like way too old to be as radical as I am about the sorts of issues, but that was very formative for me, a work experience.

EPA Interviewer: During this time, part of the discussion on risk assessments of—and perhaps this was to help the layman understand—was not so much the issue of exposure assessment, although it's an exposure issue, it was the issue of what's the land going to be used for. And that's become a very prominent piece of the equation where community involvement really can make a difference. Talk a little bit about your experience with that whole issue of setting levels based on land use.

Greer: Yeah. Well, you know, that to me always seems like that was a logical sort of exit ramp from having to have everybody go exactly the same way, so I had a positive inclination toward the idea of having at least a few bins of land uses that if you were going to use it for residential development, or a pre-school, that would be different than if you were going to pave it over and turn it into a parking lot and a parking garage.

The issue that the environmental community always had on that, was the one of institutional controls, so that what does it say on the deed of the land and where, who, is going to be in charge of making sure that somebody remembers two or three transactions later, what problem was there in the first place, so that we can make sure. That always did seem to me like, OK, well, we could solve that problem if we wanted to, and we had talked about deed restrictions and we talked about other things like legal tools that people could use. It was still always a little bit of a—it wasn't a firm stool to be sitting on.

It felt like, OK, this could work under the situation that people really stay attuned to this. It seemed important to me that in order to preserve the ability to really clean up land that was destined for future residential growth, we needed to have something for the land that wasn't destined for that so that we could actually not require that something that—we didn't want a situation where you had a doughnut where everything was contaminated around it and then we have this one cleaned-up Superfund site. That was totally illogical. But you worry about what's going to happen with certain community growth rates, etc., and there isn't an easy answer to some of that.

It's good to have the communities involved in making those decisions and they would

have a better understanding of what their town's growth rate is—whether people think that they want to preserve an area for condominium developments in the near term, etc.. It's really good to have local involvement on those land use decisions. And then the only question is how do you make sure that 10 years from now, when all these people are off doing something else, the new people there remember and are actually constrained so that they can only do certain things because things change.

EPA Interviewer: Well, EPA has now started a large initiative on post-construction issues. We are indeed focusing on those sites that are construction completion but for which there are institutional controls issues and we are revising the five-year-review guidance so that, indeed, people look at trends in development and institutional controls; whether they're in place and how urgent they are, and that sort of thing.

Greer: That's great!

EPA Interviewer: I think the recognition by the Agency that what you are saying is indeed accurate. That's the linchpin over the generations to keep things going. On the science side, EPA, the Superfund program of EPA, has always been kind of on the cutting edge of chemical science. The program has developed soil screening levels and now what we see is that the detection levels for chemicals have become so sophisticated due to technology innovation that people don't really have an idea of what those levels mean. Can you talk a little bit about that challenge, just as a scientist?

Greer: Well, we had that even, when, 10 years ago, because we always had the problem that we were, every few years, finding lower and lower levels because of some breakthrough or another on these machines. And now it's even more extreme than it was then. It really does go to the heart of trying to understand what is the harmful level. So, if you can't find it, then you were all given a "get-out-of-jail-free" card, because we don't have to worry about it. But as the detection levels get lower, yes, then, unfortunately, the questions become more acute. And there is where the Superfund program gets a bit—they're a bit of a victim of the lack of basic testing information for a lot of chemicals in commerce. Then you go to the IRIS [Integrated Risk Information System] database and you look at what percentage of chemicals have been well tested. And GAO has written a report on this, and Environmental Defense has a report on this, "Toxic Ignorance." We've run into this problem—Superfund is where the problem [is], [where] the chickens come home to roost.

You have hundreds of chemicals; many of them are very poorly understood. So the fact of the matter is that absent a huge, invigorating toxic chemical testing program through the National Toxicology Program or somewhere, it's the Superfund program that really takes this on the chin. Because there are so many chemicals for which they will not really know what a safe level is, let alone the problem of exposures to mixtures, which in Superfund is it. It's a mixture; there's very few Superfund sites… Once in a while we get a site that is all about TCE and the groundwater, but other than that we almost always have a mixture. The problem becomes more acute over time because of the detection levels. But it's certainly not true that all these low levels are not harmful. We don't know that. And it would be nice if we could think of a way to get the needs of the Superfund program to drive some of the testing in the rest of the Agency and outside of the EPA, because those testing programs are sort of

dying on the vine. And there's no way out of this unless we get to learn a little bit more about not just carcinogenicity, but neurotoxicity and reproductive hazard, etc. of these chemicals. And we are still at the point where 90 percent of the chemicals in commerce don't have basic toxicity data; that's what the GAO even says, let alone the environmental community. So [for] the Superfund program, that's untenable, because there's so many of these chemicals that are sitting at those sites. That's the problem.

EPA Interviewer: In the mid-1990s after the initial reauthorization efforts came to such a dead halt, the Agency implemented administrative reforms, in part in response to "Right Train, Wrong Track" and a lot of those reports. And the Commission's recommendations—do you have any observations from those?

Greer: That's at the point that I wasn't working hard enough to really know, unfortunately, that was just about at the point where—I don't even remember the exact year—that NRDC felt we had taken another round in Congress; we had gotten nowhere, again, and we decided that I was going to divert to another project. It was in fact a pollution prevention project. So we sort of made a switch that I had described earlier in terms of trying to keep Superfund sites from happening rather than address the problem in the Superfund program.

EPA Interviewer: What did you find the biggest challenge when you were working with the Superfund program?

Greer: I think the biggest challenge was how the on-the-ground discussions in the Superfund program are so decentralized. I worked on the RCRA program for years and years too, and there, pretty much, everything that was happening could be tracked through the *Federal Register*. The proposal comes out, you write the rules, etc. Even people petitioned for a delisting or something; everything was so centralized. Here, to me, the most difficult thing about the program is that the decisions were made in a very decentralized manner. With local input, of course, which is a good thing, not a bad thing, but then with, you know, local officials and at the state level, etc. So that actually trying to figure out what was going on in this program and to do oversight into whether the program was working was just way bigger than me. It was just such a big problem to try to figure out what is really happening in this program and to be able to make accurate generalizations about what's going right and what's going wrong, just seemed so difficult. So many hundreds of sites, and such a decentralized decision-making process, which was all pretty much site-specific.

Not very many firm rules that would say, "Everybody that has PCBs at their site is going to be cleaning up to 'X'." It wasn't like that. So, I think it was, and still is, very difficult to know if the program…how spotty it is. We probably know the places where it's going really great and we probably know the places where it's going really bad; because that's what happens. Those things tend to elevate themselves, but then that vast gray area in between, it gets very hard to know what's going on. And that was the biggest challenge, always, in the program.

EPA Interviewer: What do you think was the biggest mistake the government made in early days of the Superfund program in terms of implementing it either with responsible parties or with citizens or in science?

Greer: That's a big question. Let's see… What do I think was the biggest mistake? I guess the area I think was…I don't even want to blame the government because I don't feel like it was a knowing mistake, but I think that their initial work to try to really tell citizens what they thought they needed to know and how it needed to go. And then to be sort of caught with their pants down over and over and over again, that they were making mistakes and they didn't themselves know how it needed to go. And then creating so many of those early structures for citizen access that turned out to be just like endless "do loops" where people weren't really… They wound up putting people off instead of really drawing them in. I think that might have been, from my perspective, the biggest mistake. Of course, I think also it's true that at the outset, people really didn't know what they were doing. It wasn't really like they were intentionally saying… I don't think that they were just out there lying and cheating. I just think in the end, a more humble and inclusive approach would have served the program better, and maybe they would have learned some lessons earlier that it took a lot of years to learn doing it this other way.

EPA Interviewer: Do you have any opinions about the way Superfund was originally funded? The "polluter pays" theory, and whether that was the right way to go?

Greer: I've strong views on that. That was the way to go. And actually, one of the things that continues to be a huge aggravation to me now is that the tax sunset at a certain point for the chemical industry, which is just so handy for them. I'm sure that if there was enough people from the citizen communities and the environmental communities still battling on this topic, that that would have never happened, because it's just inherently unfair.

You know, I always felt that the feedstock tax was actually very equitable; that these were the companies that had made these chemicals in the first place. Then, when you looked at the history of a lot of these situations, the chemical companies knew that these chemicals were dangerous. They probably didn't realize they were going to cause the huge problems that they did—certainly they didn't realize how much money and headache it was going to cause—but the very companies that were paying the feedstock tax were the companies that had contributed to the Nation's Superfund sites. There was a very good analysis done of this in the middle of all of our work that showed that here are the companies with wastes at these sites and here are the companies that are paying the feed stock tax and this all aligns beautifully. That's, of course, who should be paying because you know those were the people who were profiting from the sales of all these chemicals for all of those years while they were throwing it all into the back 40, creating the Superfund sites.

So why the American taxpayer should be paying for this problem now is way beyond me. Of course, no surprise, based on how things work in Washington. It's just one-and-the-same of the way corporations lobby and the way that politicians need to get reelected. But I really feel strongly that the liability system in Superfund and the feedstock tax in Superfund was a very equitable way to go, and it is aggravating to me that the tax sunset the way that it did.

It also self-limits the program. There's only so much that Congress will allocate or appropriate if it's just kind of pulling out of general revenue. Even though I know the Agency doesn't like to talk about being funding-limited, the fact of the matter is that particularly once

you lose the feedstock tax, funding becomes very crucial. And you can't run as fast as you otherwise would want to if you don't have enough money to actually do these remedies. So that's a bummer, that's what that is.

I also think, by the way—just to show you how cynical I can be about these things—that industry played its cards well in some ways, because they, looking back I think, they exhausted their adversaries. They didn't get a reauthorization the way that they wanted it, so it wasn't like a real victory that you could celebrate, but sort of *de facto*. Many of their most important concerns eventually got addressed and the feedstock tax was one of them; so they did prevail at the end. Of course, the solution to all of that is not a Superfund solution; the solution to all that is campaign finance reform. I feel like that's a bigger problem than we are [*laughing*] and you and I can't totally walk ourselves into depression on that. Because that really does reflect the larger situation that we have in the country. Superfund is just a tiny little facet on a many-faceted diamond of, "see what you get," if that's the system that you have.

EPA Interviewer: When you—back to the beginning, back to 1981—when you were first involved in the program and Superfund was really just getting started at that point. I think in mid-'81 was the first time we had a National Priorities List.

Greer: Yes, and it had, what?

EPA Interviewer: 200 or maybe a 150 [sites]?

Greer: I even came in right when it was something like that. I was in right before we got to the 400 list.

EPA Interviewer: So, did you have any idea at that time, any inkling about what impact this law would have?

Greer: No. And I had no inkling that there could possibly be thousands of sites. I remember so well, this was before I was even—I wasn't even working at Environmental Defense. You know when the Love Canal story happened in the newspaper, I just couldn't believe it! You know, and then to learn that there might be 20 places like that—I just was—I couldn't believe there could be hundreds or thousands of those sites, so it really—I think it took us all—I don't know about the Agency—I bet the same thing happened in the Agency.

EPA Interviewer: Oh, I think it took everyone by surprise.

Greer: I couldn't believe it, and then, you know, after a while you started to think, "What, are there going to be 100,000 of these places?" It started to feel like every railroad yard and every old hardware store and every metal finishing shop was and is a potential Superfund site. You started to realize that this was a real legacy of industrial operations in this country for 200 years. But no, I could have never predicted how big this would have been.

EPA Interviewer: Well, the Superfund program in some sense has been the mother of other cleanup programs. It was one of the first to be enacted and then was followed by state

programs and voluntary cleanup programs and Brownfields programs. Talk a little bit about that evolution, if you have an opinion.

Greer: You know I just haven't tracked that stuff. I participated just a little bit on the brownfields discussions from the "how clean is clean" perspective. Because there, of course, the crucial stuff is, "What's the land going to be used for?" and, "How clean are we going to clean it up?" And you get those doughnut scenarios of, "We don't want to make this pristine while everything around us is dirtier than what we've got in the middle." But I have to say, there's only so many years that I could do this. You could hear from my voice that it was such difficult work and so I didn't follow these spin-off satellite cleanup programs.

What I did do is I worked hard for continuing additional years on RCRA, and all of the parts of the 1984 amendments that required treatment before land disposal and those sorts of things, because I could see that that was one step before—that was like the ICU [Intensive Care Unit] before pathology. [*Laughing*] We still had a huge problem that all these chemicals that probably shouldn't have even been in a waste stream, were being manufactured and [were] in the waste stream. But at least I felt like I stepped back from Superfund, but only to try to keep the patient on life-support before they just fell into the clinker of the Superfund program.

EPA Interviewer: Working on the prevention side, do you at all foresee a time when hazardous waste sites and the Superfund program as it exists today will no longer be needed?

Greer: Nope. I don't. I started to feel like I might retire before I'd feel that way. That's my new… When we talk about 15 or 20 years, you start to think, "Man, you know what? That's like if you passed my working years. That is unacceptable." Because I don't think we've learned the lessons that we needed to learn. The big lesson—the policy-implication lessons for the types of chemicals that are continuing to go into the market.

There almost needs to be… Like the TSCA program needs to have the Superfund program people as officemates or something to have the Agency really see the life cycle of the problems that go on here. You know, where a chemical doesn't get scrutiny within the 90 days under TSCA that it needs to have, and then you can see much, much later that this was a chemical that—like MTBE—that any Master's degree chemistry student will tell you, "That chemical should never have been put in gasoline."

You probably could still do this experiment—those kids don't know what's going on in this world—and say "Here's a chemical, let me tell you about it. And we are going to put it in a gasoline mixture. Let me tell you about that mixture. And now do you think that this would be an OK additive for the nation's groundwater?" I've got to tell you, no chemistry student worth his salt would have missed it. OK, so what does that tell you about whether...? We somehow don't have a feedback loop into the front end of the regulatory system, because Superfund learns the lessons of what are the problematic chemicals and what are the ones we can't even clean up once we find them, and what are the qualities that those chemicals have so that you go back to the front end and you can see and we're not there, so I think we're not going to… Now we may see the end of the Superfund program, if money dries up, because

people lose their fire in the belly to continue cleaning up, that would be a real shame, but I don't think we're anywhere close. I'm not even sure—we're not much further along than we were at the outset of the program and that really, if there ways a way to…

EPA Interviewer: Not much further along in terms of…?

Greer: Of trying to keep chemicals out of commerce because of the problems that you see that they cause at their end of their life. So, not just disposal issues, but just life cycle issues, thinking for example about POPs-type of chemicals that, actually, we know they could be airborne. They then deposit, they go up the food chain, they do this, they do that and yet we have all of this resistance to adding onto the list of 12 POPs.

EPA Interviewer: For people who don't know what a POP is…?

Greer: Oh, sorry, for persistent organic pollutants [POP], that are probably the poster child of the type of chemical that you see at a Superfund site and that you don't want to have in the stream of commerce, because you know that they are going to be impossible to cleanup, in the end. And that they are not going to go away. I think it would be good for the Agency if they could, somehow, take the lessons learned in the program about chemicals and put them into an implementation framework about regulating chemicals in commerce. But right now, we're not up for regulating chemicals in commerce, so that would be our almost academic framework, but it would be well worth doing. Because it is remarkable—the chemicals that show up over and over again at waste sites. There is a certain number of chemicals that just [show up] over and over and over again. Why do we still use trichloroethylene [TCE]? OK, I mean, what do you need to know that you don't already know? It's remarkable, and that is the huge—I mean I can't remember the number of hundreds of thousands of tons that are manufactured every year. But look at what the Superfund program will tell you about trichloroethylene.

EPA Interviewer: Interesting. And the Agency does not have the kind of structure that leads us to that sort of integrated evaluation.

Greer: Right. Right.

EPA Interviewer: We're beginning; we're not there yet.

Greer: And not to be unkind about this, just to be analytical, the reason is because most of what the Agency spends time on when it comes to TCE is figuring out what level of exposure is safe. Nobody ever says, "Look, you know what, this is crazy; OK. We've got this everywhere, we're pumping and it doesn't come out…" We just want to say, "Replace TCE. We've given you three years. Figure it out. Whatever you are using it for, find a substitute that's not highly chlorinated, that doesn't create a non-aqueous plume, that doesn't do this. That doesn't do this…"

Then that's it. And instead, the Agency had dedicated itself to figuring out whether or not TCE is a carcinogen. How many rounds have we had with the Science Advisory Board on this one and whether it's a human carcinogen? And what the slope is, and whether it's a threshold, da da da da da. And that's a risk assessment framework. And that then has…

Nobody's up at the top saying, "You know what? This chemical just has a bad profile and we're sick of it. We are sick of addressing the problems it causes and we need a different type of chemical.

EPA Interviewer: One thing industry is doing now, particularly in Europe and a bit here, is environmental management systems. Could that begin to address this?

Greer: You know, I don't know much about those environmental management systems, so I don't think I should comment about them. I haven't tracked them very closely. I do notice that the industry isn't pulling some of these chemicals off the market, even though they have paid through the nose to clean up Superfund sites. So, something is wrong there.

EPA Interviewer: So it is not happening there either.

Greer: Something is wrong. Maybe although we think it's very expensive, it must not have been that expensive, compared to the profits associated with manufacturing and selling it. Otherwise, I guess, somebody with a head on their shoulders would say, we can't afford to be associated with this chemical anymore, because it's just costing us too much money. So whatever their management systems are, it doesn't seem to be, from my perspective, leading people to conclude they need to shift into alternative types of chemical manufacturing. Even with pesticides, these companies are waiting for the Agency to write up all the IREDs [Interim Reregistration Eligibility Decisions], which is the registration eligibility documents, etc. They're not saying, "Oops. We had a really bad thing down at that Velsicol site in Arkansas. We'd better not be manufacturing this chemical anymore."

EPA Interviewer: Yes. I guess I have covered pretty much all of those things that were on my list of areas that we might want to talk about. Are there some other things related to your involvement with the program or with the Superfund program that you'd like to talk about?

Greer: Well, I guess the only other thing in my history of looking over the Superfund program… That was such an interesting moment for me was when Lee Thomas came to the Agency to run the Superfund program, and I believe that he came to us from FEMA.

EPA Interviewer: He did come from FEMA.

Greer: Which now is even more amazing, because you can see that he had probably—that was a really good move to take somebody who had this emergency management training and bring him over. I was such a fan of Lee Thomas's. At first, of course, I didn't know what to make of him. I hadn't tracked his whole career or anything. But I just remember the moment of thinking that the program was really in the hands of a professional. That he brought a staff in, including Linda Fisher, who had, I think at that time, had been working on Capitol Hill. If I remember correctly, he plucked a few people into the Agency and that was such a turning point for the program to have somebody in the center office there who was so competent at running a program. For me, that was the first time that I ever saw that one person can make a huge difference. There were so many things that… He had a very positive and active working relationship with me and others in the environmental community. He had a similarly very positive and active working relationship with the industry and with the people on the Hill, but he called the shots and he made things happen. Even though I

disagreed with a lot of the decisions and I was disappointed now and again, he, for me, was the first person I had ever really stumbled across who actually knew how to make government work.

The program was in shambles, and it was just like, "Wow, look at this. They actually got somebody in there that can run this store, so wow." And then when he became Administrator, our relationship with him continued. He had been put basically in the catbird seat to try to score some improvements in the Superfund program from a higher perch as Administrator and he worked very hard on behalf of the program. He brought Linda Fisher up with him and she just did, I think, mostly Superfund up in the Administrator's office. He's an interesting person in the history of Superfund because I see him as the savior of the program. I think these programs can only work badly for so long before people just get disgusted with them, and they lose their support. To me, Lee Thomas came in at a critical moment of the program and made everybody think, "You know, this program can deliver, and can actually clean up sites." And so he gets a lot of credit in my book for—and I think it was just… It was a first example, for me, of a public servant in the highest use of that term—to have a man of such high caliber come in to do this program. It was just great! So it was the high point, I think, in Superfund history when he was running the program.

EPA Interviewer: Are there any other individuals who really stand out in your mind over the years?

Greer: Who can forget Rita Lavelle? I mean, my goodness. I mean that to me was sort of into the, "How much worse can it get, and you know that was the other…"

EPA Interviewer: She was Lee Thomas's predecessor. Right?

Greer: Right. Exactly, so went from rags to riches. She went to jail for—I think it was for—contempt of Congress. I can't remember if that was the ultimate thing that sent her to jail, but that was the opposite extreme. When you just thought, "There's nothing we can do about this program until the program gets a different head," and that was a combination of what I remember of the program. I know this sounds so unkind, but we would walk around saying, "Are they evil or stupid? We can't figure it out." [*Laughing*] It's just like, "What is actually wrong over there*?"* It was just so over the top, that we just couldn't figure it out. I never figured it out actually, but you know what a dynamic duo with Ann Gorsuch and Rita Lavelle. I'll never forget that.

And the oversight hearings with John Dingell, Dick Frandsen—I hope you are interviewing Dick Frandsen on this history—who was just apoplectic about, "This cannot stand; we cannot have this." That was the other person that I remember. Other people. People came and went, but I would say that was the highlight and the lowlight. Having that juxtaposition was a real… That's why it was such a turning point for the operation, and it didn't take long. One of the things I used to say about the Superfund program was, "It's very frustrating, there are big problems in the Superfund program that are difficult to solve, but what's frustrating is that they can't fix the little ones. They're easy to solve." It's just like, "OK, how clean is clean?" That's a big thing, but you know to not be able to have the requisite decisions in Washington, it would be so frustrating that it was the little things that they

couldn't do either. But I had a definite sense that when Lee Thomas took the reins. I mean, he had a big job to do, but it almost was like the FEMA Director after a hurricane. It just, you know… Like everything is in shambles. Where do syou start? How do you find the right deputies? How do you pull the staff together? It was really a joy to watch from the outside. I assume it was a similar joy on the inside.

Another person that is a very bright light in my memories is Jerry Clifford, who I know is still in the Agency although in the International Program now. But Jerry just did this yeoman's work in those years when we were finished with the Superfund Commission. We had this sense of agreement with the parties about what would really improve the program. And Jerry was in charge of a lot of the interaction with Capitol Hill. And he was so knowledgeable about where everybody stood and he was really dogged in his efforts to try to get language that would work for the Agency, for us, for industry in the spirit of the Commission. I mean, I really just was so impressed with… He worked so long and so hard to… He was like the tallest-remaining person trying to make that thing happen. With all the ingredients right there and that sort of frustration we were discussing earlier. Why can't this come together? There was Jerry Clifford, endlessly doing the shuttle diplomacy necessary. I just remember so many days of getting to his office really early because it was the only time we could find when he could ask me, "What about if we did this?" Or he would send me something at night, "How about…" Just time after time after time in trying to keep this thing on track. So he was another to me…another bright spot in the history of the program. I really do think if anybody could have done it, it would have been Jerry and that kind of effort at that point, but it just wasn't to be had.

EPA Interviewer: No. It got very close.

Greer: It got close.

EPA Interviewer: Very close. It was, I think, almost out of conference when it was finally collapsed.

Greer: Right. But already within conference, it had frayed, and there were problems with it. And I was worried that by the time this gets back to the Agency to implement, it's going to be a big headache. It was no longer an elegant piece of legislation, and then you worry about that, we worry about that always. It sometimes is so easy to strike a political compromise. But we always feel like we are representing implementation of the programs, because the work that we do is all… We do work on Capitol Hill, but it so often… We're litigating at the Agency, we're giving the comments, so we feel like we are very involved in the implementation phase of these things. And we hate to give the Agency something that was a finely crafted political compromise, but we know it's never going to work. Whoever's going to get this law on their desk to try to write a rule is just never going to be able to make it happen. That conference committee was making a mess of this thing, so maybe it was a grace that the Agency didn't have it to do, because I think it would have been a mess at that point to actually turn into another…the next phase of the program. So it was off the rack. I mean, it's sad to say that because there were very high water marks on that, but I was not upset when it did not come out of conference, because that was never going to fly.

EPA Interviewer: Well, and now with the Brownfields amendments and the changes that that made to liability side of the ledger, there is not the same kind of impetus there…

Greer: Right.

EPA Interviewer: …to amend the law.

Greer: That's right. And the other thing that happened is—and this happened early; this happened a couple of years after the Commission's work was done, I think. Most of these big companies had already—their RODs were signed. They stopped thinking that there was going to be something that was going to happen that was retrospective onto the RODs. Because that had been a topic of debate, but that didn't ever really get under sail. And at a certain point, I think, what they stood to gain from Superfund changes in the Superfund program had become marginal because they were already in under the law as it had been and the implementation as it had been. So, I think, some of the largest companies—the DuPonts of the world—they didn't have a big enough stake anymore in the outcome to stay so involved on the Hill as they had been when they thought they could change things before they were under orders for this and that. So that was interesting, too. It shows that the program was moving forward, so, I guess that's good. [*Laughing*]

EPA Interviewer: In inches. Anything else that you can think of about those years in the 1980s and 1990s that…?

Greer: I think we've covered the landscape. No, I can't think of anything else.

EPA Interviewer: Well, thank you so much for sharing your wisdom and sharing your experiences with us. I'm sure that people, as people hear this on the web that it will become useful and that it'll be a useful record for the Agency to have in the future.

Greer: Yeah. Are you going to do it in a way that people can… You should set [it] up like a little blog. Have you thought about that?

EPA Interviewer: Oh, interesting. No, I don't think we have. Wouldn't that be fun?

Greer: You know, apparently, these things are just as easy as can be to be. All you have to do is say at the outset, "This in no way reflects on Agency's decisions." We have talked about doing this at NRDC. We have now an NRDC blog, but we don't… Well, occasionally some staff person writes it. It's usually outside people, and sometimes people even say things that are inconsistent with what we believe, but it's a way to get people interacting with stories and with concepts, and so….

EPA Interviewer: So maybe making an internal Agency blog?

Greer: You could have an internal blog, which would be a total kick. And I think you should have an external, and you should let people who… Some of these people around the sites who are going to be reading the history—they can add their own thing and other people can read it. I think you probably will ask your lawyers. There's just a few

criteria that you need to have, but if you make it clear that this is not really an Agency product….

EPA Interviewer: Anything official…

Greer: This is just a blog. It becomes much more exciting for people to read.

EPA Interviewer: Wouldn't that be a hoot?

Greer: Because, you know, they're going to say, "Oh, I remember that. It wasn't like that at all." It will become a living history.

EPA Interviewer: Oh, that is a wonderful idea. Well, thank you very much.

Greer: And it's not hard, once it's up and running. It's nothing to…

EPA Interviewer: To maintain it.

Greer: No, you might have somebody before it posts, just take a look. Like at my son's camp; they have somebody… You can't put any swear words in. In other words, we would have the adult criteria. But you wouldn't want to really say, "Oh, no," because of the content.

EPA Interviewer: Because of the opinion expressed.

Greer: It wouldn't be censoring, it would just be…just to have it, not just become really a problem, but I think it would be pretty easy to maintain and it would be interesting.

EPA Interviewer: That would be wonderful.

Greer: And that's one thing where then, when all these people that are so decentralized from people who live around these sites, who know each other, it would be fun for them.

EPA Interviewer: Well, what an interesting concept, too, because we're only able to interview a limited number of people. I think we're interviewing about three dozen people over the 25-year history and so there are many people with stories to share and histories with the program that would be valuable for that.

Greer: And you could even invite them in electronically. You could track them down, ask them to send it to 10 people they think would be interested and….

EPA Interviewer: What fun that would be.

Greer: Yeah.

EPA Interviewer: Oh what a great idea to take back. You've given me several great ideas, today. Thank you.

Greer: You're welcome.

EPA Interviewer: Thank you so much.