

Dear Representative,

The undersigned 129 public interest groups urge you to oppose H.R. 2279, the Reducing Excessive Deadline Obligations Act of 2013, a package of three bills that threaten human health and the environment while protecting polluters from liability for the costs of toxic cleanups. The bill amends the Resource Conservation and Recovery Act (RCRA) and Superfund (the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)) in a manner that substantially increases the potential for harm in communities across the United States. As one in four Americans live within three miles of a hazardous waste site, safe management and prompt cleanup of toxic waste sites are essential to our nation's health and economy. Because the majority of hazardous waste sites disproportionately harm communities of color and low income communities, Congress should afford great attention to protecting our nation's most vulnerable communities.

The three bills that comprise H.R. 2279 weaken the nation's hazardous waste laws and place American communities at increased risk of toxic exposure and financial liability in the following ways.

### **Title I- Reducing Excessive Deadline Obligations Act of 2013 (H.R. 2279)**

Title I will:

- Eliminate the requirement for EPA to ensure in a timely fashion that its hazardous waste regulations are current, relevant and effective to protect human health and the environment. The bill removes a requirement for periodic review of regulations under RCRA, making the timing of review wholly discretionary.
- Eviscerate the longstanding principle of the Superfund law that polluters must pay for cleanup of hazardous waste releases by allowing insufficient existing requirements to block Superfund obligations, thereby leaving communities unprotected and taxpayers at risk of funding expensive cleanups.
- Fail to ensure full liability for toxic waste cleanup, thus endangering the health of communities, causing significant delays in remediation, and placing a great burden on taxpayers to cover the shortfall, which is often substantial, particularly at hardrock mine sites and large chemical facilities.
- Place burdensome and unnecessary roadblocks to delay establishment of financial assurance requirements to ensure polluters have bonds or other insurance in place to cover the nation's most costly and high risk Superfund cleanups.

### **Title II- The Federal and State Partnership for Environmental Protection Act of 2013 (H.R. 2226):**

Title II will:

- Cause delays in emergency Superfund cleanups by requiring unnecessary consultation prior to initiating urgent, time-sensitive removal actions.
- Allow states to reduce their cost share for cleanup, thereby decreasing the funds available for additional cleanup efforts.
- Establish roadblocks to listing new toxic waste sites on the National Priority List (NPL) by giving states the power to veto such listings. The NPL is the list of the most dangerous toxic waste sites in the nation, and the listing of a site is often a prerequisite to its cleanup.

### **Title III- Federal Facility Accountability Act of 2013 (H.R.2318)**

Title III will:

- Potentially increase costs and delay cleanups at hazardous waste sites owned by federal facilities, some of the largest and most dangerous Superfund sites in the nation.

In summary, we oppose amendments to RCRA and CERCLA contained in H.R.2279 because these three bills place the health of our communities and our environment in great danger and increase the cost of hazardous waste cleanup for U.S. taxpayers.

Respectfully,

Alaska Community Action on Toxics  
American Bird Conservancy  
Amigos Bravos  
Appalachian Voices  
Asheville 350  
Athens County Fracking Action Network  
B.E. Cause (Bokoshe Environmental Cause Group)  
Barron Park Association Foundation  
Bastrop County Environmental Network  
Biofuelwatch  
Cahaba Riverkeeper  
Center for a Sustainable Coast  
Center for Biological Diversity  
Center for Effective Government  
Center for Health, Environment & Justice (CHEJ)  
Center for sustainable coast  
Citizens Against Ruining the Environment  
Citizens Against Titan  
Citizens Coal Council  
Citizens for a Clean Pompton Lakes  
Citizens for Responsible Resource Management  
Citizens' Alliance for Responsible Energy  
Citizens' Environmental Coalition  
Citizens' Environmental Coalition  
Clean Water Action  
Cleanuprocketdyne.org  
Comite Contra la Incineracion en Arecibo, Puerto Rico  
Comite Dialogo Ambiental, Inc.  
Community Research  
Concerned Citizens for Mills Gap Cleanup  
Concerned Citizens of Ohio/Randolph  
Concerned Citizens of Ohio/Portage County  
Concerned Citizens of Ohio/Franklin Township  
Concerned Citizens of Ohio/Lake Township  
Concerned Citizens of Ohio/Paris  
Concerned Citizens Ohio/Hiram  
Concerned Citizens Ohio/Kent  
Concerned Citizens Ohio/Shalersville  
Concerned Residents of East Fishkill – NY  
Concerned Residents of Portland, NY + People Like Us {Crop Plus)  
Cornett Environmental Consulting  
Dogwood Alliance  
Earth Circle

Earth Ethics/Ethical Society St. Louis – Missouri  
Earthjustice  
Earthworks  
Eatontown Environmental Commission  
Eco-Cycle  
Edison Wetlands Association  
Energy Justice Network  
Environment America  
Environmental Defense Action Fund  
Environmental Health Trust  
Environmental Integrity Project (EIP)  
Fall-Line Alliance for Clean Energy (FACE)  
Food & Water Watch  
Frackfree Mahoning Valley  
Gila Resources Information Project  
Global Alliance for Incinerator Alternatives (GAIA)  
Global Justice Ecology Project  
Great Basin Resource Watch  
Green Delaware  
Green Door Initiative  
Green Environmental Coalition  
Greenaction for Health and Environmental Justice  
Greenpeace  
Guardians of Mill Creek Park  
HEAL Utah - The Healthy Environment Alliance of Utah  
Health Care Without Harm  
Healthy Schools Network  
Healthy Schools Network  
Idaho Conservation League  
Institute of Neurotoxicology & Neurological Disorders  
Ironbound Community Corporation  
Ithaca South Hill Industrial Pollution  
Just Transition Alliance  
Ka Wai Ola O Waianae – Hawaii  
KeepNilesSafe – Ohio  
Kentuckians for the Commonwealth  
Kentucky Environmental Foundation  
Labadie Environmental Organization (LEO)  
Labor Network for Sustainability  
League of Conservation Voters  
Market Air Quality Campaign  
Midwest Coalition for Responsible Investment  
Minnesota Center for Environmental Advocacy  
Moapa Band of Paiutes – Nevada  
Montana Environmental Information Center  
Montanans Against Toxic Burning  
Mountain Watershed Association  
NAACP  
National Committee for the New River  
Natural Resources Defense Council

New Mexico Environmental Law Center  
New Mexico Sportsmen  
New Jersey Friends of Clearwater  
Northern Plains Resource Council  
Northwest Atlantic Marine Alliance  
Nuclear Watch New Mexico  
Ohio Citizen Action  
Old Bedford Village Development Inc.  
Partnership for Policy Integrity  
Peach Bottom Concerned Citizens Group  
People for Safe Water  
Physicians for Social Responsibility  
Physicians for Social Responsibility – Florida Chapter  
Progressive Leadership Alliance of Nevada  
Protect Arkansas Wildlife  
Radioactivewastealert.org  
Rhode Island State Nurses Association  
Rosebud Protective Association  
San Juan Citizens Alliance  
Sierra Club  
Southern Alliance for Clean Energy  
Southern Environmental Law Center  
Stafford Citizens for Open Government  
Stand Up/Save Lives Campaign  
Sierra Club – Tennessee Chapter  
Texas Campaign for the Environment  
Texas Environmental Justice Advocacy Services (TEJAS)  
The Ruckus Society  
Transition Asheville  
Voluntary Cleanup Advisory Board  
WE ACT for Environmental Justice  
West End Revitalization Association  
Western North Carolina Alliance  
Western Organization of Resource Councils  
Working on Waste – New Hampshire  
World Temperate Rainforest Network