

CHEMICAL HERITAGE FOUNDATION

**THE TOXIC SUBSTANCES CONTROL ACT:
FROM THE PERSPECTIVE OF
MARK A. GREENWOOD**

Transcript of Interviews
Conducted by

Jody A. Roberts and Kavita D. Hardy

at

Ropes & Gray LLP
Washington, D.C.

on

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(With Subsequent Corrections and Additions)

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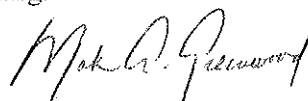
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MARK A. GREENWOOD

1951 Born in Lansing, Michigan on 18 December

Education

1974 B.A., Political Science, University of Michigan
1978 M.S., Public Policy, University of Michigan
1978 J.D., University of Michigan Law School

Professional Experience

U.S. Environmental Protection Agency, Washington, D.C.
1978-1983 Attorney-Advisor
1983-1987 Assistant General Counsel for the Resources Conservation and
Recovery Act
1987-1988 Assistant General Counsel for Superfund
1988-1990 Assistant General Counsel for Pesticides and Toxic Substances
1990-1994 Director, Office of Pollution Prevention and Toxics

Ropes & Gray LLP, Washington, D.C.
1994-present Partner
2000-2006 Office Managing Partner

ABSTRACT

Mark Greenwood, as an undergraduate, wanted to work in government. As a law student, he discovered the emerging field of environmental law. After graduating, he joined the EPA's Office of General Counsel and eventually became the Assistant General Counsel for Pesticides and Toxic Substances. From there Greenwood joined the newly re-named Office of Pollution Prevention and Toxic Substances as Office Director. His first challenge was recuperating from the failed asbestos rule, a demoralizing event that also effectively eliminated rule-based risk management. At the same time, he was given new tools with the Pollution Prevention Act. The office experimented with voluntary data collection and risk management initiatives, about which Greenwood drew some conclusions during the interview. From his perspective, the Toxic Substances Control Act (TSCA) is comprised of both a risk assessment and risk management program, but these have developed separately and often in conflict with each other. He met with this difficulty when implementing a cohesive toxics program. In 1992 and 1994 Greenwood participated in Congressional hearings on TSCA, but Congress, in the end, did not provide a clearer agenda.

At the end of the interview, Greenwood outlines his vision and expectations for toxics reform. With REACH generating risk information, he expects EPA to focus increasingly on risk management, with or without new legislation. He discusses the importance of communicating chemical information to downstream users, as well as the political and practical feasibility of erasing the new chemicals/existing chemical distinction.

INTERVIEWERS

Jody A. Roberts is the Associate Director for the Center for Contemporary History and Policy and the Manager of the Environmental History and Policy Program at the Chemical Heritage Foundation. Roberts received his Ph.D. and M.S. in Science and Technology Studies from Virginia Tech and holds a B.S. in Chemistry from Saint Vincent College. His research focuses on the intersections of regulation, innovation, environmental issues, and emerging technologies within the chemical sciences.

Kavita D. Hardy is a research assistant in the Environmental History and Policy Program at the Chemical Heritage Foundation. She received a B.A. in Chemistry and Economics from Swarthmore College.

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