EPA To Propose New Source Review Changes (Cont.)

In the related ANPRM released last week, EPA said it is contemplating changes in new source construction review requirements to allow states to establish a two-tier system for reviewing new sources. "Major sources" would be subject to an air quality analysis and public comment, and, if the source would increase pollution in a nonattainment area, it would be subject to the offset requirement. Smaller sources would be reviewed to assure compliance with state implementation plans, but would not be subject to air quality analysis, public comment and emission offset requirements. Contemplated rule would also suggest that offset requirements for major hydrocarbon sources be limited to those planning to locate within a specified distance of major urban areas, and that new particulate sources be given more leeway to locate in rural areas.

Interested parties are invited to comment on both the interpretive ruling and ANPRM by Feb. 15, 1977. Comments should be consolidated and forwarded to EPA, Control Programs Development Division (MD-15), Research Triangle Park, N.C. 27711. All comments received before Feb. 15 will be considered as EPA develops proposed modifications or clarifications, and all comments will be available for public inspection at EPA's Public Information Reference Unit, 401 M St., S.W., Washington, D.C. 20460.

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EPA UNIT DRAFTS 5 ug/m^3 AMBIENT LEAD STANDARD, DRAWS FIRE FROM NRDC, FORMER EPA SCIENTIST

Ambient concentrations of atmospheric lead should not exceed a three-month average of five micrograms per cubic meter, according to a draft Environmental Protection Agency "lead criteria document." Developed in response to a court order that EPA list lead as a criteria pollutant (A/WPR, Nov. 15, 1976, p. 453), draft says leaded gasoline accounts for more than 90% of current lead emissions, but adds that lead emissions from large stationary sources can cause "significant local pollution problems."

To arrive at its proposed ambient standard, EPA sampled lead concentrations in the blood of adults and children in "relatively clean environments" in Ohio and Hawaii, and projected how much lead in the air would be needed to increase blood levels to a danger point. Assuming that children are the most susceptible portion of the population, draft says the proposed standard "represents an air lead level, with an inherent margin of safety, at or below which no adverse health effects should be observed in any segment of a normally healthy population."

Draft says that except in regions immediately adjacent to large, uncontrolled stationary sources or those with heavy automobile traffic, atmospheric lead usually contributes less than 30% of the blood stream's lead, with the majority entering through ingestion. Draft recommends a "comprehensive study" of potential lead-producing stationary sources to "completely characterize" the size and types of lead particles produced, and also recommends additional studies of lead effects in children and the chemistry of lead in the environment.

NRDC Attorney Calls Standard Ridiculous

Responding to the draft, David Schoenbrod of Natural Resources Defense Council, whose suit forced EPA to list lead as a criteria pollutant, told A/WPR the proposed ambient standard was so high as to be "ridiculous," particularly in light of earlier EPA studies which assumed a standard of two micrograms per cubic meter. Schoenbrod said he was preparing extensive comments on the draft.

Draft standard was also criticized as "far too large" to protect public health by a government scientist, formerly with EPA, who asked that his name not be used in this story. "Some of it gets down to a question of scientific judgment," he said, charging that the draft largely ignores the potential ill-health effects of lead from dust and dirt and does not draw a proper correlation between atmospheric lead and blood-level lead. To ensure a "real margin of safety," he said, ambient levels should be set "somewhere between one and two micrograms per cubic meter."

He added, however, that he thought the draft also ignored some recent available scientific literature which, he said, would "strengthen" the argument in favor of a more restrictive standard. Terming the draft partly a "cut-and-paste job" of earlier EPA lead studies, the scientist said "They did not do their job – they did not resolve scientific uncertainty in such a way as to protect public health."

Comments on the draft should be submitted no later than Jan. 20, 1977, to James R. Smith, Criteria and Special Studies Office (MD-52), EPA Health Effects Research Laboratory, Research Triangle Park, N.C. 27711. Final criteria document is scheduled for publication in June.

Natl Resources Defense Council