

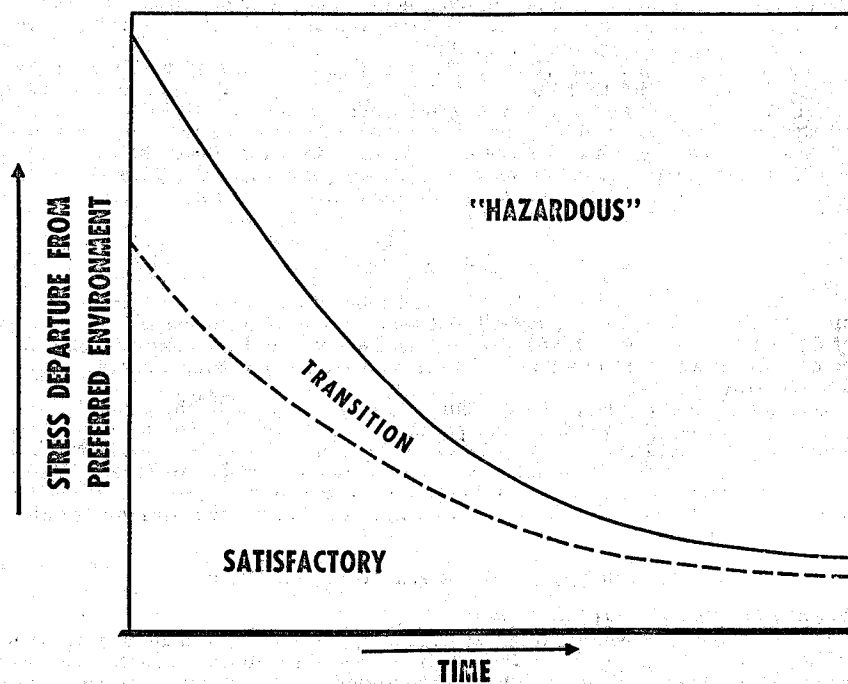


FIGURE 3

Legal and administrative requirements are an integral part of long-range as well as short-term plans for environmental pollution abatement. It is self-evident that legal methodology must proceed forward hand in hand with the scientific. The Department of Defense is required to comply with a variety of legal and administrative procedures. Our concern is that in this broad area, subject as it is to a variety of influences, there should be developed improved understanding of the true complexity of the problem. Regardless of the approach taken in arriving at the legislative and administrative requirements, there are certain fundamentals which appear to be absolutely essential. These include:

- a. The necessity for determining whether or not the emphasis is to be upon performance standards or specific approval of equipment and practices.
- b. The need for flexibility to provide for the future.
- c. The recognition of the "test of practicality". This applies both to the feasibility of achieving what the law requires, and to the means of determination as to their achievement.

There is a major difficulty affecting the establishment of programs for environmental pollution abatement arising from the problems which have been cited herein as to establishment of a true measure of the environmental quality desired. Anyone who is familiar with the many difficulties inherent in the establishment of allowable concentrations for industrial environmental exposures is aware of the differences of opinion regarding the significance of some of the number values utilized in such expressions as "maximum allowable concentrations," "threshold limit values," and "acceptable concentrations." Based on experience in this realm of environmental exposure control, there is a need for better understanding of the difference between a standard and a criterion. As pointed out in the State of California's excellent publication "Water Quality Criteria" the term "standard" as used in an environmental sense applies to a definitive rule, principal or measure established by authority. The comments in that publication on criteria, objectives, requirements and standards are worthy of quoting here.

The term "standard" applies to any definite rule, principle, or measure established by authority. The key words in this definition are *definite* and *established*