

COMMENTS ON INDUSTRYWIDE, INDUSTRY-BY-INDUSTRY EFFLUENT STANDARDS

1. Industrywide, industry-by-industry, effluent standards would be inconsistent with the current Federal Water Pollution Control Act which requires the establishment of water quality criteria in receiving streams to protect the legitimate uses of each section of major river basins.

2. Since all receiving waters cannot be used for all purposes and their capacity to assimilate treated wastes are highly variable, there should be no uniform effluent requirements for all industries. This would impose an unjustified burden on companies discharging effluents into a large stream with limited water uses and understate the requirements for a plant operating on low-volume streams of high quality.

3. It is equally obvious, however, that the establishment of receiving water quality criteria alone will not be sufficient to guide industries and municipalities as to the effluent targets that must be met to achieve the goals for the particular receiving stream. Ultimately, the total allowable pollution load on a particular stream must be established and allocated back to industrial and municipal dischargers.

4. The imposition of nationwide effluent standards would result in an unnecessary expense to the consuming public. The availability of water for industrial use is only one of many factors in an industrial operation. If we are going to legislate that this factor is exactly the same for everyone, everywhere, whether local conditions require it or not, then we might as well legislate to equalize all the other factors such as labor costs, transportation, availability of raw materials, etc.

5. In the past it has been the prerogative of the individual plant to select treating methods to satisfy a condition in a stream at the most economical cost. Since stream conditions and flow vary for each individual stream and plant effluent volumes vary, the setting of a common effluent standard would result in unnecessary increased costs for many, but not all plants.

6. In this connection, industry should properly provide technical guidance to regulatory authorities in formulating programs for individual plant waste reduction. Industry is in the best position to assist in developing an equitable basis for allocating allowable waste loads among plants discharging into a particular receiving stream.

7. With respect to air pollution, the above principles apply as well to control of emissions to the atmosphere. Air quality criteria should be established as targets to be achieved. Individual air basins should then be studied from a meteorological, topographic, and population basis. An inventory of all emissions should be conducted and an equitable rollback of objectionable levels of pollutants prescribed where necessary.

8. During the course of the hearings, the question concerning the establishment of industrywide standards was raised a number of times. This concept was discussed by Dr. Abel Wolman during his summation of the hearings. We concur most wholeheartedly with his conclusion that industrywide standards would not be practical.