

run simple tests within a reasonable amount of time to confirm those points before the changes were made?

Mr. WILLIAMS. There are no such simple tests.

Mr. AUERBACH. That is the whole point.

Mr. CARPENTER. That is what I was asking, whether you considered it practical.

Mr. WILLIAMS. No.

Mr. AUERBACH. No quick and easy ways. It is not likely that research will suddenly produce a whole new set of figures forcing you to change your judgments.

Dr. STEIGERWALD. Also, I don't think there is any point to verify. We are saying that control to achieve that standard will preclude episodes and will preclude chronic effects because of day-to-day exposure. We are only talking about what happens on 3 days a year, 1 percent of the time.

That control, because of the strong relationship between the average pollution for the year and the peak day of the year, the peak hour of the year, and this 1 percentile point—there is a strong relationship.

We have been looking at this for 10 years, in 10 or 12 cities. We are saying that control to that point will preclude the episode effect and will preclude the chronic effect; so, there really is no point to verify. You can't expose animals to that level of pollution 3 days a year and then not expose them to anything else, because that is not the way people are exposed.

Mr. CARPENTER. Let me pursue this once more, because if this point which a municipality would choose from the criteria which you published had a confidence limit on it, as to whether it was one-tenth plus or minus 0.05, that as I understand it might make a substantial difference to the power industry, a difference which all of us would want to know about and to be able to consider.

So perhaps I could ask this question. When a criteria for 24 hours is suggested by your publication, what are the confidence limits likely to be for the guidance of local government?

Dr. MIDDLETON. The confidence that would be involved here is not just a statistical one but the fact that we have exhaustively looked at all the information available. I think you are making a premise that the document might be a flimsy one in the first place. I want to disabuse you of the idea right now. This is a very considerable effort, involving exhaustive study and analysis of the scientific data that are available.

And when we recommend a set of numbers being related for a particular chemical or criterion, dose response, what we say is not going to be said lightly or capriciously. It is going to be based on useful data. If we don't have the useful data, we will see that we get what we think is required.

And when you keep reiterating the need to validate, I read this as meaning that because scientific knowledge is never known at one moment, that we may make some premature decisions. They are premature only in respect to the future, the speculative future. We have to deal with the pollution as it is now.

So if you want to have fiducial limits set for a particular number, this is statistically possible. It is mathematically predictable.