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CITIZENS' BULLETINS

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EPA CITIZENS' BULLETIN... A compilation of
previously issued news releases reissued occasionally for interested citizens.

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(Feb. 21, 1971)

Needed State Authorities Detailed By EPA

Administrator William D. Ruckelshaus of the Environmental Protection Agency has listed seven specific kinds of legislative authority that will be needed by State air pollution control agencies to meet the requirements of the Federal Clean Air Act.

In a letter to State governors, Ruckelshaus invited them to provide leadership to gain passage of the needed legislation.

Under amendments to the Clean Air Act signed by President Nixon on December 31, 1970, Ruckelshaus said, Federal and State agencies must "accomplish a great deal within a relatively short time. This task will require an increased commitment of resources and an increased willingness to come to grips with the complexities of air pollution control. I ask your cooperation in this important and exciting endeavor."

Ruckelshaus pointed out that the States must develop, by the end of January 1972, implementation plans and enforcement procedures to achieve national air quality standards in all areas of their jurisdiction. Such standards were proposed by EPA last month for six classes of pollutants, and are to be promulgated by April 30, 1971.

Under amendments to the Clean Air Act signed by President Nixon on December 31, 1970, the States are required to achieve healthful air quality by mid-1975 and make reasonable progress to further clean the air after that. If the States fail to submit satisfactory plans to meet these objectives, Ruckelshaus is required by law to prescribe such plans.

Ruckelshaus' letter said EPA is preparing guidelines, to be available "within the next several weeks" to assist State governments in formulating their implementation plans. Federal technical advice and financial assistance would also be stepped up, he added.

The Ruckelshaus letter indicated that a plan could not be considered satisfactory unless the State air pollution control officials have State-wide authority to:

1. Adopt emission standards and limitations and any other measures necessary (e.g., limitations on the sulfur content of fuels) for attainment and maintenance of national ambient air quality standards.
2. Enforce without delay applicable laws, regulations and standards, with appropriate sanctions including authority to seek injunctive relief.

3. Abate pollutant emissions on an emergency basis to prevent substantial endangerment to public health, i.e., authority comparable to that available to the Environmental Protection Agency under Section 303 of the Clean Air Act, as amended.

4. Establish and operate a Statewide system under which permits would be required for the construction and operation of new stationary sources of air pollution and the construction and operation of modifications to existing sources. Also required is authority to prevent such construction, modification, or operation, and any other necessary land use control authority.

5. Obtain information necessary to determine whether air pollution sources are in compliance with applicable laws, regulation, and standards, including authority to require record-keeping and to make inspections and conduct tests of air pollution sources.

6. Require owners or operators of stationary sources to install, maintain, and use emission monitoring devices and to make periodic reports to the State on the nature and amounts of emissions from such stationary sources; also, authority to make such data available to the public as reported and as correlated with any applicable emission standards.

7. Carry out a program of inspection and testing of motor vehicles to enforce compliance with applicable emission standards when necessary and practicable, and other authority necessary to control transportation.

The letter said that State or regional air quality standards adopted under previous legislation would remain in effect if they were equal to or better than the national air quality standards. He said that States that had developed regional implementation plans under previous legislation would be notified within 90 days after promulgation of national air quality standards as to any modifications that would be needed to achieve the Federal Standards.

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(April 12, 1971)

EPA Announces Auto, Truck Test Results

The Environmental Protection Agency (EPA) has published Federal emission test results for prototype 1971 model motor vehicles certified as meeting the Federal air pollution emission standards.

The results, which are attached, show the emission levels of hydrocarbons and carbon monoxide for some 90 engines used in nearly 400 foreign and domestic cars. Models from 28 foreign and nine domestic manufacturers are listed. Emission test results for hydrocarbons and carbon monoxide are also listed for 40 heavy duty gasoline engines made by five U.S. companies. Smoke test results are shown for some 40 heavy duty diesel engine groups, covering six U.S. and three foreign manufacturers.

Publication of the test results in the Federal Register is called for in the Clean Air Amendments signed into law by President Nixon on December 31,

1970. The publication, which took place Saturday, is intended to show prospective purchasers the comparative performance of the prototype vehicles and engines tested. No 1971 passenger cars submitted by manufacturers failed to meet the standards.

National standards to control tailpipe emissions of hydrocarbons and carbon monoxide from new passenger cars and light trucks first went into effect beginning with the 1968 model year, and were tightened beginning with the 1970 model year. Standards to reduce emissions of hydrocarbons by evaporation from these vehicles went into effect with the 1971 model year. Beginning with the 1970 model year, standards were imposed to reduce emissions of hydrocarbons and carbon monoxide from heavy duty gasoline engines, and to reduce smoke emissions from heavy duty diesel engines.

The standards require 1971 model year automobiles to be equipped with closed crankcase systems to prevent all blowby emissions. The exhaust standards allow no more than 2.2 grams per mile of hydrocarbon emissions and 23 grams per mile of carbon monoxide. In addition, the loss of gasoline by evaporation from the carburetor and the fuel tank must be less than 6 grams per test.

More accurate test procedures were announced in November, 1970, to further reduce hydrocarbon and carbon monoxide emissions from automobiles in 1972 and later model years.

Emissions from heavy duty gasoline fueled engines are limited to 275 parts per million of hydrocarbons and 1.5 percent carbon monoxide.

Heavy duty diesel engines must meet Federal smoke emission standards of 40 percent opacity during acceleration, and 20 percent opacity during lugging. These opacity standards limit the darkness of the exhaust smoke to a light gray haze.

Detailed results of the tests on any particular car may be obtained from the Administrative Officer, Air Pollution Control Office, Main Terminal Building, Willow Run Airport, Ypsilanti, Michigan 48197. Requests should specify the vehicle of interest by make, model, model year, and engine displacement.

3

(April 30, 1971)

EPA Sets National Air Quality Standards

William D. Ruckelshaus announced final publication of National air quality standards for six common classes of pollutants -- sulfur oxides, particulate matter, carbon monoxide, photochemical oxidants, nitrogen oxides and hydrocarbons.

The Clean Air Act required him to set pollution limits at levels that protect the public health and provide an adequate margin of safety. States are required to plan to meet the standards by 1975.

"These are tough standards," Ruckelshaus said. "They are based on investigations conducted at the outer limits of our capability to measure connections between levels of pollution and effects on man. In the case of carbon monoxide, one of the most important automobile pollutants, we have set a standard to protect against effects reported by investigations which prompt arguments even among our own scientists. In the case of photochemical oxidants, also largely contributed to by automobiles, our standards approach levels that occur fairly commonly in nature.

"The legislative history of the Clean Air Act makes it plain, he added, "that when we talk about protecting the 'public health' against polluted air, we are talking about protecting those citizens who are particularly sensitive to it -- in other words, those citizens already afflicted with cardio-respiratory problems. If we have erred at all in setting these standards, we have erred on the side of public health."

Ruckelshaus emphasized that meeting these standards in the time allowed by the law will have a profound effect on U.S. cities. He said the carbon monoxide problem would be difficult to solve. "Of seven major cities where we have good enough data to make accurate predictions, only one -- Cincinnati, Ohio -- will come close with the presently contemplated automobile controls in the time allowed. And Cincinnati will not actually reach the standard until 1977," he said.

Ruckelshaus said that in the other six cities -- Chicago, Denver, Los Angeles, New York, Philadelphia and Washington -- the Federal motor vehicle control program would not bring air pollution down to the standard until sometime in the 1980's.

"If we are to meet the legal deadline for carbon monoxide, then, some cities may have to require drastic changes in their commuting habits," he added.

He said most regions of the country can meet the deadline for sulfur oxides and particulates by switching to low sulfur fuels already available to these regions, and by a much more rigorous application of existing methods for controlling particulate matter. He said some increase in electric bills might result, "but the resources are there."

He said seven metropolitan areas might have serious trouble meeting the sulfur oxides and particulate standards. "The problem is particulates, and the most difficult case from a control stand-point is New York," he said. "We estimate that to bring air pollution levels down to the standard for particulates in New York will require a 300 percent increase in natural gas usage in the city. The only encouraging feature in the prognosis is that curing the particulate problem with natural gas will also take care of the sulfur oxides problem." He forecast somewhat less serious difficulties for Chicago, St. Louis, Baltimore, Hartford, Buffalo, and Philadelphia.

"All in all," he explained, "meeting the particulate standard in the time allowed by the law in these seven cities will require increasing our total national use of natural gas by about 15 percent, and almost half that increase would go to New York City alone. Unless other sources of natural gas are developed, such an increase in the use of this fuel might soon reduce what has been considered a desirable balance between reserves and consumption."

Ruckelshaus said the relationship between levels of hydrocarbons and nitrogen oxides in the air and the production of photochemical oxidants is so complex and at this juncture so little understood, that it is difficult to predict whether or not the Nation will meet the standards for these pollutants in the time allowed by the law. "I am advised that the prospects for achieving significant control of existing stationary sources of the nitrogen oxides themselves in the time allowed by the law are bleak," he said. "However, the picture has its promising aspects. The Federal program for reducing emissions of hydrocarbons and nitrogen oxides from new automobiles, plus the regulations that we will soon issue for controlling nitrogen oxide emissions from new and modified electric power plants, should carry us a considerable distance down the road to an air quality that we and our children can enjoy."

NATIONAL AIR QUALITY STANDARDS

Under the law, EPA sets two types of air quality standards. Primary standards protect the public health. Secondary standards protect against effects on soil, water, vegetation, materials, animals, weather, visibility, and personal comfort and well being.

Within nine months after a National air quality standard is set, the States must submit plans to meet it. If a State fails to submit a plan, or if a plan is inadequate, the Administrator issues a Federal plan for the State. Mr. Ruckelshaus may allow a State up to 27 months to submit plans to achieve secondary standards.

The Environmental Protection Agency proposed National air quality standards for the six classes of pollutants on January 30, 1971 and invited comments at that time. The standards published today are:

SULFUR OXIDES -- Sulfur oxides come primarily from the combustion of sulfur-containing fossil fuels. Their presence has been associated with the increased incidence of respiratory diseases, increased death rates, and property damage.

Primary Standard

--80 micrograms per cubic meter (0.03 ppm) annual arithmetic mean.

--365 micrograms per cubic meter (0.14 ppm) as a maximum 24-hour concentration not to be exceeded more than once a year.

These are identical with the standards proposed in January.

Secondary Standard

--60 micrograms per cubic meter (0.02 ppm) annual arithmetic mean.

--260 micrograms per cubic meter (0.1 ppm) maximum 24-hour concentration not to be exceeded more than once a year.

--1,300 micrograms per cubic meter (0.5 ppm) as a maximum three-hour concentration not to be exceeded more than once a year.

These standards are as proposed in January, except for the addition of the three-hour limit, which was adopted to minimize the impact of emissions from large sources during brief periods of adverse weather conditions.

PARTICULATE MATTER -- Particulate matter, either solid or liquid, may originate in nature or as a result of industrial processes and other human activities. By itself or in association with other pollutants, particulate matter may injure the lungs or cause adverse effects elsewhere in the body. Particulates also reduce visibility and contribute to property damage and soiling.

Primary Standard

--75 micrograms per cubic meter annual geometric mean.
--260 micrograms per cubic meter as a maximum 24-hour concentration not to be exceeded more than once a year.
These are identical with the standards proposed in January.

Secondary Standard

--60 micrograms per cubic meter annual geometric mean.
--150 micrograms per cubic meter as a maximum 24-hour concentration not to be exceeded more than once a year.
These are identical with the standards proposed in January.

CARBON MONOXIDE -- Carbon monoxide is a by-product of the incomplete burning of carbon-containing fuels and of some industrial processes. It decreases the oxygen-carrying ability of the blood and, at levels often found in city air, may impair mental processes.

Primary and Secondary Standards

--10 milligrams per cubic meter (9 ppm) as a maximum eight-hour concentration not to be exceeded more than once a year.
--40 milligrams per cubic meter (35 ppm) as a maximum one-hour concentration not to be exceeded more than once a year.
The eight-hour limit was proposed in January. The one-hour limit was revised. Both the one-hour limit and the eight-hour standard afford protection against the occurrence of carboxy-hemoglobin levels in the blood of 2 percent. Carboxy-hemoglobin levels above 5 percent have been associated with physiological stress in patients with heart disease. Blood carboxy-hemoglobin levels approaching 2 percent have been associated by some researches with impaired psychomotor responses.

PHOTOCHEMICAL OXIDANTS -- Photochemical oxidants are produced in the atmosphere when reactive organic substances, chiefly hydrocarbons, and nitrogen oxides are exposed to sunlight. Photochemical oxidants irritate mucous membranes, reduce resistance to respiratory infection, damage plants, and contribute to the deterioration of materials.

Primary and Secondary Standards

--160 micrograms per cubic meter (0.08 ppm) as a maximum one-hour concentration not to be exceeded more than once a year.

The limit proposed in January was 125 micrograms (0.06 ppm). Evidence was produced that such a limit is reached naturally in some areas, and serious questions were raised about data used as a basis for that proposal. The revised standard includes a margin of safety that is substantially below the most likely threshold level for adverse effects.

HYDROCARBONS -- Hydrocarbons in the air come mainly from the processing, marketing and use of petroleum products. Some of the hydrocarbons combine with nitrogen oxides in the air to form photochemical oxidants. The hydrocarbons standards, therefore, are for use as a guide in devising implementation plans to achieve the oxidant standards.

Primary and Secondary Standards

--160 micrograms per cubic meter (0.24 ppm) as a maximum three-hour concentration (6 to 9 a.m.) not to be exceeded more than once a year.

The limit proposed in January was 125 micrograms (0.19 ppm). Revision of these standards was necessary to achieve consistency with the related standards for photochemical oxidant.

NITROGEN OXIDES -- Nitrogen oxides usually originate in high-temperature combustion processes. The presence of nitrogen dioxide in the air has been associated with a variety of respiratory diseases. Nitrogen dioxide is essential in the natural production of photochemical oxidant.

Primary and Secondary Standards

--100 micrograms per cubic meter (0.05 ppm) annual arithmetic mean.

This standard was proposed in January, along with a 24-hour average value. Attainment of the annual average alone was judged adequate to provide for the protection of public health.

The Environmental Protection Agency is examining other pollutants to determine whether any may be covered by future air quality standards.

4

(May 8, 1971)

Final Regulations on Certification for Federal Permits

Final regulations governing certification for industrial discharges that require a Federal permit or license have been issued by the Environmental Protection Agency.

The certification is required by Section 21 (b) of the 1970 amendments to the Federal Water Pollution Control Act.

The regulations explain the Federal and State procedures by which an industrial discharger receives certification, in most instances by the State, that his wastes are in compliance with the applicable water quality standards.

By Executive Order last December, President Nixon directed that the Army Corps of Engineers and the EPA initiate a permit program as a nationwide means of controlling the discharge of pollutants into navigable waters.

The certification is one of the requirements that each discharger must meet in order to receive a permit from the Corps of Engineers. The permits are required under the River and Harbor Act of 1899. Industries must make application for the permit by July 1.

Under the regulations, EPA Regional Administrators review the applications, certifications and any supplemental information. If the Regional Administrator determines that the discharge may affect the quality of the waters of any other State or States, he must notify the other affected States.

When another State has an objection to the issuance of a permit, the Corps of Engineers will hold a public Hearing. At this hearing, the EPA Regional Administrator will evaluate and make recommendations on the objection.

The EPA Administrator will himself certify that a discharge will not violate water quality standards in only two instances. These instances are when the Administrator has promulgated the water quality standards or when there is no State or interstate agency with the authority to issue a certification.

If a State or interstate agency fails to issue a certification within a reasonable time (generally considered to be six months, but in any event not over one year) the statute provides that the requirement for certification will be waived.

Ruckelshaus said, "The permit program is part of the major effort to overcome the country's environmental problems. It will require a high degree of cooperation, both within the Federal Government and between the Federal Government, the States and industry.

EPA's Regional Administrators and their staffs will offer all possible assistance to the States in their effort to process the thousands of certifications which will be required."

The regulations were published May 8 in the Federal Register.

5

(May 27, 1971)

EPA Sets Rules on Tax Write-Off for Anti-Pollution Facilities

The Environmental Protection Agency has announced the adoption of final regulations for certifying those pollution-control facilities of businesses which qualify for rapid amortization under Section 169 of the Internal Revenue Code. Section 169 was added to the code by the Tax Reform Act of 1969.

Treasury Department regulations for the fast tax write-off of such facilities were published in the Federal Register on May 17, 1971. They provide in general that a taxpayer may amortize over a 60-month period the cost of any treatment facility that has been certified by appropriate State agencies and by EPA.

The new EPA regulations, published in the Federal Register on May 26, 1971, provide guidelines as to facilities that may be eligible for the certification. Forms for the certification will be made available through EPA Regional Offices, which will make the Agency's determination as to the eligibility of such facilities.

Under the new regulations, certification may be made for a treatment facility installed after December 31, 1968, when it is used in connection with a plant or other property that was in operation before January 1, 1969. A treatment facility is one that abates or controls air or water pollution by removing, altering, disposing of, or storing a pollutant, contaminant, waste, or heat.

A facility which is not a building may qualify for the tax deduction even though it performs functions in addition to the abatement of pollution. In such a case, EPA will determine the percentage of the cost of the facility which is allocable to its abatement function.

A building must be exclusively devoted to pollution control in order to qualify for the rapid write-off. The Treasury's regulations contain a detailed definition of a "building".

A facility used in connection with both pre-1969 and newer plants may also qualify for the fast tax write-off, with EPA determining the percentage of the cost of the facility that is allocable to the pre-1969 plant.

Section 169 does not apply to facilities whose costs will be recovered by profits they generate. Certification, therefore, will be denied for pollution-control facilities that are used to abate pollution generated by others than their owners, when fees are charged by the owners for the use of such facilities.

6

(June 30, 1971)

Regulations to Control Auto Pollution Announced

Administrator Ruckelshaus announced a series of final regulations by which 1975 and 1976 model cars will be judged for their compliance with the Clean Air Act of 1970.

Major provisions include:

-- Standards for carbon monoxide and hydrocarbons beginning with the 1975 model year. These would limit emissions to 3.4 grams of carbon monoxide and 0.41 grams of hydrocarbons per vehicle mile. By comparison, allowable emissions from 1970 automobiles were 34.0

grams of carbon monoxide and 4.1 grams of hydrocarbons per vehicle mile. The 90% reduction in permissible levels is called for in the Clean Air Act.

-- A new exhaust emission standard for nitrogen oxides, which will limit emissions to 3.0 grams per vehicle mile beginning with the 1973 model year. This will be the first Federal limit placed on emissions of nitrogen oxides from motor vehicles. By comparison, emissions from 1971 cars that are not equipped with nitrogen oxides control systems are 4.0 grams per vehicle mile.

-- A further reduction in the nitrogen oxides limit to 0.4 grams per vehicle mile beginning with the 1976 model year.

-- Changes in the present EPA testing procedure, beginning with the 1975 model year, which will more accurately reflect the driving experience of the motor vehicle population in major urban areas.

In announcing the revisions, Ruckelshaus said: "I realize these are stringent standards which will challenge the ingenuity of American industry. At public hearings May 6 and 7, the automotive industry indicated that achievement of the standards--particularly those for oxides of nitrogen--by the established deadlines would be extremely difficult. The costs resulting from implementation of these requirements will be substantial both to the industry and the consumer.

But even though the achievement of these standards poses major engineering difficulties and will be costly and may, in the case of NO_x emissions, require technological breakthroughs beyond the present state of the art, the need to protect the Nation's health demands that effective control of automobile emissions must be placed high on our list of National environmental priorities. The Congress clearly expressed its concern in this regard by writing the requirements for the 1975 and 1976 standards into law."

Ruckelshaus stated that significant reductions in auto emissions from today's levels are essential to achieve the goal of clean air. The standards announced today provide for a 90% reduction in the levels of auto emissions, as required by the Clean Air Act.

The purpose of the National Air Quality Standards is to protect the public health and welfare. These air standards were announced by EPA last April 30. Achievement of these standards requires restrictions on auto exhaust because automobiles are the source of nearly two-thirds of the carbon monoxide, more than half of the hydrocarbons, and some two-fifths of the nitrogen oxides emissions into the air of the United States each year.

Adoption of the standards for 1975 and 1976 is called for under the Clean Air Amendments signed into law by President Nixon in December, 1970. The 1973 nitrogen oxides standard is not specifically required by the amendments, but the legislation gives EPA authority to set such a standard.

In addition to the regulations announced today, EPA administrator Ruckelshaus also promulgated proposed regulations to adopt, beginning with the 1973 model year, the test procedure changes that have already been set to begin with the 1975 model year. Interested persons wishing to submit comments on this proposal have 60 days to send four copies of such comments to the Administrator, Environmental Protection Agency, Attention: Office of Air Programs, Parklawn Building, 5600 Fishers Lane, Rockville, Maryland 20852.

BACKGROUND INFORMATION ON AUTO EMISSION STANDARDS

This statement contains background information on major features of the regulations relating to control of air pollution from motor vehicles, as published in the Federal Register on June 29, 1971.

Five major subject areas are involved:

1. Establishment of final exhaust emission standards for carbon monoxide and hydrocarbons to begin with the 1975 model year. As called for by the 1970 Clean Air Amendments signed by President Nixon on December 31, 1970, these require a 90% reduction from the levels allowed by the standards in effect for the 1970 model year.
2. Establishment of a new exhaust emission standard for nitrogen oxides to begin with the 1973 model year. This is not specifically required by the Clean Air Act, but the Act does give EPA authority to set such a standard for any emission it believes causes or contributes to air pollution endangering public health or welfare.
3. The setting of a final exhaust emission standard for nitrogen oxides to begin with the 1976 model year. As called for by the 1970 Amendments, this requires a 90% reduction from the emissions from 1971 model cars that had no nitrogen oxides control systems.
4. Establishment of a testing procedure for prototype vehicles to determine compliance with the nitrogen oxides emission standards.
5. Changes from the present test procedure to become effective with the 1975 model year testing program.

1975 CARBON MONOXIDE AND HYDROCARBON STANDARDS

The first Federal motor vehicle exhaust standards, issued under authority of the Clean Air Act Amendments of 1965, went into effect beginning with the 1968 model year. Limits were placed on emissions of carbon monoxide and hydrocarbons. For the 1970 model year, the exhaust standards were tightened. A new testing and sampling procedure, along with revised values of the standards to restate the levels in terms of the new testing procedure, went into effect for the 1972 models -- now being tested for certification purposes.

The 1970 Amendments to the Clean Air Act require that emissions of carbon monoxide and hydrocarbons from 1975 and later model year cars be

reduced by a least 90% from the emissions allowed for the 1970 models. These new standards, promulgated today, will limit exhaust emissions of carbon monoxide to 3.4 grams per vehicle mile and of hydrocarbons to 0.41 grams per vehicle mile.

A point of possible confusion is that the 1975 standards initially proposed on February 26, 1971, were 4.7 grams of carbon monoxide and 0.46 grams of hydrocarbons per vehicle mile. These represented a 90% reduction from the allowed emission levels in 1970. However, they were related to the testing method currently used. A different, more representative testing method will be used to check the 1975 cars. Therefore, it was necessary to make tests of the current method and the 1975 method to determine their equivalency in comparison to 1970 model year automobiles. These tests established that a car having the 1970 allowable emissions of 47 grams of carbon monoxide and 4.6 grams of hydrocarbons per vehicle mile in terms of the current test method, would have emission values of 34 grams and 4.1 grams, respectively, in terms of the method to be used in 1975. Thus, in establishing the final value of the 1975 standards, the latter emission values are the ones to which the 90 % reduction is applied.

1973 OXIDES OF NITROGEN STANDARD

Previous Federal motor vehicle emission standards have not included nitrogen oxides. The standard of 3.0 grams per mile, to be effective with the 1973 models, will be the first limitation of emissions of this contaminant from motor vehicles by the Federal government. By comparison, emissions from uncontrolled 1971 vehicles is approximately 4 grams per mile.

1976 OXIDES OF NITROGEN STANDARD

The 1970 Amendments to the Clean Air Act require that emissions of nitrogen oxides from 1976 and later model year cars be reduced by at least 90% from the levels emitted by 1971 cars that did not have control systems for oxides of nitrogen.

A series of tests on such 1971 cars showed that nitrogen oxides emissions were 4.0 grams per vehicle mile. A 90% reduction this places the 1976 standard at 0.40 grams per vehicle mile.

NITROGEN OXIDES TESTING PROCEDURE

The testing procedure is similar to the one used for carbon monoxide and hydrocarbons except, of course, that different instruments are used to measure the level of nitrogen oxides in the exhaust gases. Some changes in the general procedure from that currently used have been introduced to begin with the 1975 model year. These are described below. It is further proposed that these test procedures be applied for in testing the 1973 emission standard.

CHANGES IN TEST PROCEDURE

The test procedures now in effect were first put to use to test the 1972 model year vehicles for conformance with the standards. This exhaust emission test was designed to determine mass emissions of exhaust pollutants

while simulating an average trip of 7.5 miles in an urban area from a cold start. The test consists of engine startup and vehicle operation on a chassis dynamometer through a specified driving schedule. A proportional part of the exhaust is collected in a bag, and the composite sample is analyzed for the various gases.

As a result of experience with the testing procedure, and based on more recent studies of vehicle operational experience, some changes in the procedure have been made to become effective with the 1975 model year testing program. Most of these are technical changes, but one bears mentioning.

Under current test procedures, which had originally been proposed to be applicable to 1975 and 76 vehicles, the entire test is composed of a single vehicle-run on a dynamometer that begins with the vehicle completely cold. Analysis of vehicle operation data shows that in addition to the usual early morning cold-start, vehicles make several hot-starts each day. A test procedure was developed that also includes a hot-start, (which presents special engineering problems to assure that emissions are controlled under these conditions) and that is weighted to reflect the emissions from a car over a twenty-four hour period (instead of solely during the morning commute-trip as in the present procedure). Analysis of results obtained show that, for purposes of protecting air quality in the most critical areas, the alternate test procedure will more accurately weight the cold-start operation of vehicles during the early morning hours than would the use of the current test procedure.

The new procedure will involve a dynamometer run that will consist of two tests--a "cold" start test begun after the vehicle has been shut off for 12 hours, followed by a "hot" start test, begun after the same engine has been turned off for ten minutes following the first cold test. The samples for each test will be collected in separate bags, the contents analyzed, and the results combined in a weighted manner so that the total result to be compared with the standard will consist of 43% of the cold start emissions and 57% of the hot-start emissions.

ADDITIONAL PROPOSALS

In addition to the final regulations published, there also was published a notice of proposed rule-making that would make the changes in test procedures applicable beginning with the NO_x emission controls for the 1973 model year. These are the same changes that have been finalized for the 1975 model year. It may be noted that, because of the difference in test procedures, there is a necessary revision of the numerical value of the standards. Thus, if the revised test procedures are used beginning in 1973, the numerical value of the carbon monoxide standard will be changed from 39.0 grams per mile to 28.0, the hydrocarbon standard from 3.4 grams per mile to 3.0, and the nitrogen oxides standard from 3.0 to 3.1. These do not represent actual changes in the standards, but rather numerical revisions needed to properly relate the standards to the testing and measuring method used.

7

(July 2, 1971)

EPA Explains Position on Publication of Detergent Lists

Dr. Stanley M. Greenfield, Assistant Administrator for Research and Monitoring of the Environmental Protection Agency, explained the Agency's position on the publication of lists of phosphate contents of laundry detergents. "We have received many requests for updated lists and questions as to why we have not published additional lists," he said, "and feel our position should be publicly clarified."

Dr. Greenfield noted that the Federal Water Quality Administration, the functions of which are now administered by the Environmental Protection Agency, had published lists of the phosphate content of a number of common brand-name detergents in 1970. "I am pleased," he stated, "that the publicity given to this matter by these lists and by the interest and concern of environmentally-conscious consumers across the Nation has led to broadened efforts to develop phosphate-free and low-phosphate detergents, but the Agency has also become increasingly concerned that these new formulations must be thoroughly evaluated for acceptability, from the standpoints of environmental quality, public health, and hazard to the consumer.

"The rate of introduction of new products and reformulation of old products has become so rapid," he noted, "that it is essentially impossible to prepare a list which doesn't become obsolete almost as soon as it is published. This, coupled with the fact that some manufacturers now apparently market products of differing composition for different geographical areas, has led us to decide to refrain from publishing any further lists at this time and to urge consumers to be aware that lists previously published by the Federal Water Quality Administration can no longer be considered as a reliable basis for comparison of products on today's market.

"The fact that comprehensive and national lists of detergents as to phosphate content are no longer practical is being considered by the Environmental Protection Agency," he added, "as part of an overall Administration review of the environmental and health problems of detergents. As pointed out in the testimony of the Chairman, Council on Environmental Quality, and the Surgeon General, United States Public Health Service, at the recent hearings of the Federal Trade Commission on the proposed FTC requirements for the labelling of detergents, this review has the goal of developing an overall program to deal with the environmental effects of detergents while ensuring protection of public health, including how labelling requirements might fit into the overall program.

"From an environmental standpoint," he added, "attention should be directed to all constituents of detergents, and not limited to phosphates. Detergents are unique among consumer products in that over five billion pounds are produced annually, and essentially all of these products used go down the drain, adding directly to the burden on waste treatment plants and the Nation's waters.

"I urge consumers to avoid overuse of home laundry and dish-washing products as part of their role in environmental stewardship," he said. "The amount of detergent required by the individual will vary considerably according to such factors as hardness of water, type of clothes to be washed, and type of soil to be removed. By experimenting and using the minimum amount suited to individual needs, the housewife can contribute directly to restoring the quality of the Nation's waters."

8

(July 15, 1971)

EPA Sets Ground Rules for Clean Air Act Lawsuits

The Environmental Protection Agency has proposed rules for giving notice of civil suits against alleged violators of standards and abatement orders under the Clean Air Act.

The Act provides that any person may commence a civil action against the EPA Administrator when there is alleged a failure to perform any non-discretionary act or duty prescribed in the Act. At least 60 days advance notice must be given to the Administrator by certified mail at the EPA headquarters in Washington before such suits are filed.

The proposed guidelines provide for the service of notices of lawsuits to individual states, alleged violators, the Administrator, and appropriate EPA regional administrators.

The proposed guidelines say that such notices must identify the complainant and describe with reasonable specificity the act or failure to act, or in the case of alleged violators, the violation, the location and dates of such violations.

The proposed guidelines were published in the Federal Register July 8, 1971.

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