

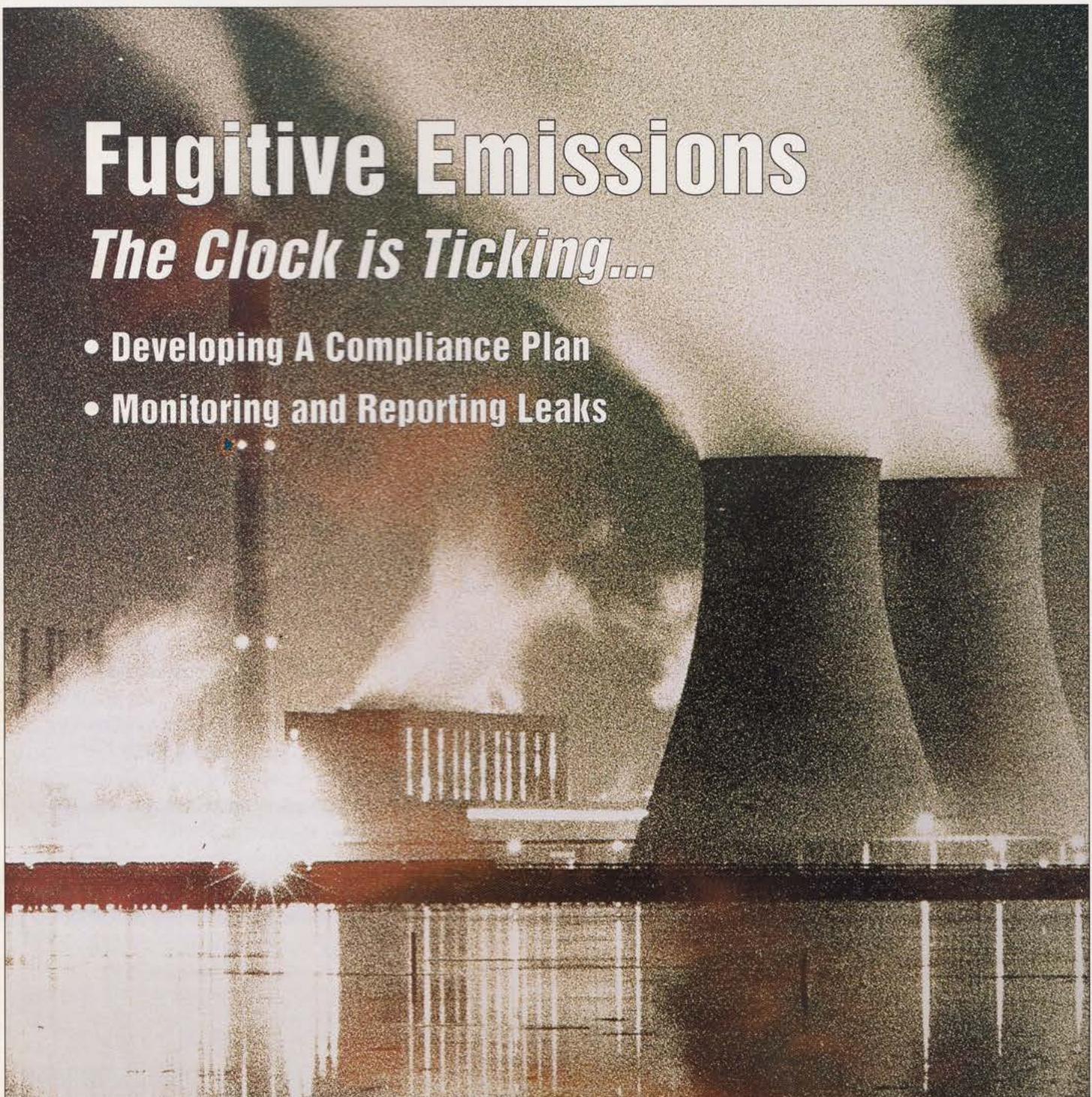
Environmental PROTECTION

DEDICATED TO THE CONTROL OF AIR AND WATER POLLUTION, WASTEWATER AND HAZARDOUS MATERIALS

MARCH 1995

Fugitive Emissions *The Clock is Ticking...*

- Developing A Compliance Plan
- Monitoring and Reporting Leaks



Reformers In The Spotlight

Once again, regulatory reform is the watchword on Capitol Hill. So what else is new.

This time, however, it appears that consensus may be near on several issues that could profoundly change the regulatory landscape. Republican initiatives in the areas of risk assessment and unfunded mandates, which would have their biggest impact in the environmental arena, are steadily picking up steam. If a compromise can be struck between zealous House backers and their more cautious Senate counterparts, both bills could be headed for President Clinton's desk in short order.

EPA, which had been paying lip service to providing enhanced risk assessment, is now leading the Clinton Administration's opposition to the risk bill. Administrator Browner said the House bill would create a "procedural maze" that could jeopardize many existing and future environmental rules. "Requiring it for every single action is neither fair, effective nor affordable," Browner told a House hearing.

Industry groups feel otherwise. Eager to see their long-held calls for better science behind environmental regulations put into action, they are nearly unanimous in their support of better risk assessment. Leaders of three of the heaviest-regulated industry sectors – chemical manufacturing, petroleum processing and pulp and paper making – make complementary arguments in support of beefed-up risk assessment in our special section on regulatory reform (page 22).

"If we want our regulations to achieve the most benefit to society, we must improve the technical quality of risk assessments performed by government agencies," declares Fred Webber, president of the Chemical Manufacturers Association.

With the emotion that typically accompanies environmental issues as a backdrop, it appears that Webber's viewpoint has gained the high ground in the debate.

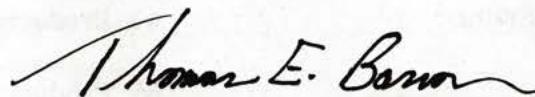
HON Realities

This issue also features two related articles on complying with the Hazardous Organic National Emission Standards for Hazardous Air Pollutants, one of the boldest – and costliest – components of the 1990 Clean Air Act amendments. The HON rule, which tightens the lid on fugitive emissions from process vents, wastewater processing, transfer operations and process equipment, is among the top regulatory headaches facing chemical manufacturers as they approach an April, 1997 deadline.

As ENSR's David Seifert points out, 170 other facility types will face similar requirements before the year 2000. Those industries may want to study how the chemical makers broach the compliance challenge before they follow suit, he notes.

Seifert's article addresses Subpart G of the rule, which focuses on vents, storage vessels and the like (page 30). A companion article written by consultant John Bacon looks at Subpart H, which calls for developing a system for monitoring and reporting fugitive emissions from process equipment, valves, pumps and pipes (page 36). Since there can be as many as 20,000 points to monitor at a given facility, good preparation is key.

And don't miss our Hazardous Materials Software Guide (page 50), which lists new software tools for tracking, managing and reporting hazardous materials at a site. Our four-page guide will help you zero in on the software that best suits your needs.



Tom Barron

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