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Lynn Gallagher and Leonard Miller, Clean Water Handbook

James Fosnaught

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public trust doctrine. The same doctrine holds true for non-tidal sovereign water boundaries within the individual states. Both chapters present techniques for locating these water boundaries, as well as case studies that further illustrate the techniques.

Later chapters explain which waters are sovereign, and discuss state, federal and national water boundaries. Cole's description of the boundaries between water bodies includes an in-depth discussion of bays. The final chapter provides a discussion of non-sovereign water boundaries. With the exception of the final chapter, the treatise primarily focuses on governmental ownership of water boundaries.

The appendix provides technical specifications for the survey of boundaries between public trust tidelands, submerged lands and adjacent uplands. Cole warns that these procedures should be determined on a case-by-case basis. All case citations are fully indexed, and references to journal articles, surveying information, and other material are provided. An index of terms comprises the final pages.

Laurie Lingle

LYNN GALLAGHER AND LEONARD MILLER, CLEAN WATER HANDBOOK, Government Institutes, Inc., Rockville, Maryland (1996); 439pp; (\$89.00); ISBN 0-86587-512-X, softcover.

The *Clean Water Handbook* is a theoretical and practical guide to a clear understanding of federal clean water law. Lynn Gallagher and Leonard Miller have written a general handbook to guide practitioners and other interested persons through the comprehensive and complex structure of the Clean Water Act. The authors have extensive experience in environmental law. They previously co-authored the *NPDES Permit Handbook* (Government Institutes, 2nd ed., 1992). Mr. Miller, while working for the U.S. Environmental Protection Agency ("EPA") in 1976, directed changes in the NPDES permit program. From 1979 to 1980, he was the Acting Deputy Assistant Administrator responsible for enforcement of the EPA's water quality and hazardous waste rules.

The handbook is segmented into nine chapters, or sections, beginning with a brief overview of the various laws which culminated in the passage of the Federal Clean Water Act ("Act"). The first chapter includes elements of the Act, key terms, and statutory and regulatory definitions. The other chapters discuss the NPDES permit program; effluent limitations; effluent toxicity control; pre-treatment programs; storm water and non-point source discharges; preventing, reporting and responding to spills; wetlands and the dredge and fill permit program; and enforcement under the Act. Two helpful appendices contain a list of acronyms and a copy of the Act itself. The writing is clear and avoids legalese, yet without compromising detail. Each section begins with a content box which overviews the material presented at a glance. Pertinent regulations are discussed, as is relevant case law.

Chapter two, which is on the NPDES permit program, covers the various responsible authorities involved in obtaining a permit; the steps involved in completing the permitting process; and includes ref-

erences of applicable forms, followed by an explanation of types of variances. Chapter three focuses on the effluent limitations of a NPDES permit and how they are determined and regulated. The four technology-based limitations for direct dischargers are explained, as are two types of technology-based limitations for indirect dischargers. Whole effluent toxicity ("WET") testing and control, its elements and role in clean water compliance are discussed in chapter 4. An example of WET permit requirements shows a typical provision in the permits requirements.

Discharges into municipal or public sewer systems and the pre-treatment program are outlined in chapter five. The chapter includes the roles of each level of government and the standards of the pre-treatment program. A discussion of prohibitions is followed by a section on defenses against alleged violations. A lengthy section on enforcement explains the methods and applicable rules. The storm water program and definitions used in non-point source discharges are thoroughly covered in chapter six. Chapter seven contains an overview of preventing, reporting and responding to oil spills. The process for notification of and exemption from reporting clarify the regulatory procedures under a NPDES permit. Chapter eight covers the 404 Program, including theory and practice involved with dredge and fill permits. The chapter also includes a discussion on liability and "takings" issues. The final chapter covers overall enforcement authority and procedures. A discussion on private enforcement ramifications is discussed in a section on citizen suit provisions.

The *Clean Water Handbook* makes a useful comprehensive guide to any person who is involved in clean water law. The information it contains provides an understanding of the federal, state and local enforcement authority that are clean water law.

James Fosnaught

C.C. LEE, SAMPLING, ANALYSIS, & MONITORING METHODS: A GUIDE TO EPA REQUIREMENTS, Government Institutes, Inc., Rockville, Maryland (1995); 256pp; \$65.00; ISBN 0-86587-477-8, softcover.

The growth of environmentalism in the United States during the 1970s led to the proliferation of environmental laws. The statutes, rules, and regulations that have evolved since then require qualitative and quantitative measurement of chemical species that may have adverse effects on the human health or environment. As a result, thousands of chemicals are regulated, and the specific requirements for sampling, analysis and monitoring of these chemicals are found throughout the entire 40 Code of Federal Regulations ("CFR") from Part I to Part 1517. Finding information about these chemicals can be a tedious task for the environmental practitioner.

Lee notes that "[o]ne of the key elements to successful environmental protection is the conduct of environmental measurement and risk assessment studies." Environmental measurement includes sampling, analysis, monitoring, quality control and quality assurance. Risk