

9-1-1997

C. C. Lee, Sampling, Analysis & Monitoring Methods: A Guide to EPA Requirements

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Vicki L. Spencer, Book Note, C. C. Lee, Sampling, Analysis & Monitoring Methods: A Guide to EPA Requirements, 1 U. Denv. Water L. Rev. 144 (1997).

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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

assessment involves: "(1) the determination of the kind and degree of hazard posed by an agent (such as a harmful substance); (2) the extent to which a particular group of people has been or may be exposed to the agent; and (3) the present or potential health risk that exists due to the agent."

Both environmental measurement and risk assessment require accurate identification of chemical species. This guide was developed to assist with this process. It covers the following areas:

1). A summary of the environmental laws and corresponding regulations in 40 CFR.

2). A chemical cross-reference for sampling, analysis, monitoring, and risk assessment regulations.

3). A list of chemicals, their emission standards, and their measurement methods under the requirements of the Resource Conservation and Recovery Act, the Safe Drinking Water Act, the Clean Water Act, and the Clean Air Act.

4). A list of sources from which health-related information can be obtained for performing risk assessment calculations.

The book consists entirely of tables and explanatory notes that are intended to be a reference for anyone involved in environmental protection activities. Based upon Dr. Lee's extensive experience in conducting engineering and environmental research projects, it should prove to be a useful tool.

Vicki L. Spencer

DONALD J. PISANI, WATER, LAND & LAW IN THE WEST, University of Kansas Press, Lawrence, Kansas (1996); 273pp; \$29.95; ISBN 0-7006-0795-1, hardcover.

This collection of essays represents the finest works by the acclaimed western and environmental historian, Donald Pisani. Written between 1982 to 1994, these essays delineate how water, land and forests have played a central role in the development of the American West. Although the collection is divided into four sections, none should be considered in isolation, as each essay addresses the government's failure "to achieve justice, equity, or efficiency in the administration of natural resources." Pisani's position is that past and present public policy has lacked planning, cohesiveness, and leadership, resulting in the slow erosion of the nation's most valuable resources. It is his hope that past experiences will impact future policy in the areas of public land and resources.

Part One of this collection consists of three essays that address the topic of water rights in the West. The first essay provides an overview of the development of western water law in the nineteenth century. By 1900 prior appropriation was firmly established in the West, although it did coexist with riparian rights in parts of the Pacific Coast and the Great Plains. The second essay in this section explores the origins of the prior appropriation doctrine in two California mining districts. The doctrine, although dominant, was not altogether favored by the