

## (7) Appendices

In view of the recent Exxon Valdez and the Gulf of Mexico spills, the book is timely, to say the least.

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*Sara Title III: Intent and Implementation of Hazardous Material Regulations*, by F.L. Fire, N.K. Grant and D.H. Hoover, Van Nostrand Reinhold, New York, NY, 1989. ISBN 0-442-23903-7, 279 pp., \$39.95.

“That the truth is self-evident” is a phrase found in the foundations of American Democracy. And self-evident are the opening phrases of this text.

“Sara Title III is and will continue to be the topic of much discussion. It’s impact on industry, local and state government, and the community is far reaching, as each of these entities must participate in the planning process and the right-to-know provisions. Currently there is much confusion concerning the appropriate actions to be taken and the exact nature of the responsibilities assigned.”

The book makes a valiant attempt to clear up confusing points and explore what is required by SARA and why. Unfortunately, it falls somewhat short of fulfilling its promise, if any book could, with such a far-reaching new program that mandates massive, country-wide hazardous material spills planning by both government and industry.

SARA Title III is part of the Superfund Ammendments and Reauthorization Act of 1986. In fact it is, or rather could be, a law on its own, dealing with hazardous materials, emergency response planning, and community right-to-know. It was enacted after the tragic leak of methyl isocyanate in Bhopal, India (not Bohpol as the book states). Chapter 1 discusses the background and the general requirements and compliance dates of SARA.

The impact of SARA on business, the local fire department (which is normally the first responder to spills) and industry are discussed in Chapter 2. Missing from this discussion, I feel, is the impact on local governmental entities charged with writing local response plans. (In Ohio where this reviewer lives, these plans are being written by state-appointed committees in each County). Chapter 3, entitled Regulated Hazardous Chemicals broadly, but I believe inadequately, discusses the U.S. laws on the topic. The Toxic Substances Act is mentioned briefly, (although it is really irrelevant to the main topic of the book). There are three other important acts that govern hazardous chemicals which are relevant: section 311, the Clean Water Act, RCRA and CERCLA. Too little time is spent on each of these laws and none at all on the provisions of the Clean Air Act regulating the emissions of hazardous chemi-

cals. The OSHA Communication Standard (which deals with the notification of workers concerning hazards of the chemicals they use) is however, discussed.

“How industry should comply with SARA” is the title of Chapter 4. Topics covered are the facility coordinator (who by law must be identified) and his/her role, how to classify materials pursuant to the law’s reporting requirements, (Section 312 for emergency response), and the very different aspects of Section 313 reporting – chronic emissions (as opposed to acute releases) of a whole host of toxic chemicals.

In general, Section 313 requires every owner/operator of every regulated facility to make an inventory of all the chemicals manufactured, imported, processed, or used at that facility, and report the quantities of toxic chemicals released to the environment during the previous year. The chapter is much too brief to be useful and, moreover, in a book dealing with emergency releases could well have been left out. However, since the authors wanted to cover SARA Title III completely, they ought to have covered the topic of chronic emissions more thoroughly by asking an industry representative to write a complete chapter (none of the book’s authors have the industrial background/perspective to do this). Chapter 5 returns to the area of the authors’ expertise namely, Responder Training. Here the authors discuss the formation, equipping, training, support, and operation of an industrial response team. This chapter is followed logically by a chapter on the “Fire Department and First Responder Training Requirements.”

Chapter 7 reverts to organizational planning, dealing with the State Emergency Response Commission (SERC) which is mandated by law to undertake statewide response planning and oversee the local planning of the LEPC’s (Local Emergency Planning Committees). The latter groups are the focus of Chapter 8 which goes into detail on the LEPC membership, organization, establishment of procedures, training, staffing, and relationships to SERC.

For me, the book really began with Chapter 9, “Preparing the Emergency Response Plan.” The opening words of this chapter are: “Preparing and updating the emergency response plan is the heart of SARA, Title III. It is this activity toward which everything else is directed.”

I could not agree more. Halfway through the chapter the authors give a sample outline for a plan and discuss this in general. However, no down-to-earth examples of real plans (good or bad) are given, nor is guidance given on how to write a plan. For me, this would have been very useful as I try, as many others have, to write our local plan. In the authors’ defense, however, I am sure that no plans were written by the time they wrote the book.

In Chapter 10, the authors’ speculate on what the future might hold for response planning. Part II of the text (really chapter 11) overviews hazardous materials and hazardous wastes. Chemicals are discussed under the general headings of flammability, combustibility, flash point, reactivity, etc. Some specific chemicals are named as examples.

More than half of the book (actually 170 out of 280 pages) is devoted to appendices, a common overuse of this section, resulting in much space being wasted. In this case, the authors have reproduced the law (Title III), OSHA's Hazard Communication Standard, list of regulated chemicals, (the list is useful, from my perspective), forms for reporting chronic releases (these are from the State of Ohio, which are less than useful from this reviewer's perspective) and a cross reference (or check list) form and reviewing plans. Also included is a 20 page glossary.

In summary, the book is an excellent idea and holds great, but unfulfilled, promise. But having gained some experience with SARA, I hope the authors consider publishing a much expanded, more detailed and useful volume soon.

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*The Hazardous Waste Q & A*, by Travis Wagner, Van Nostrand Reinhold, New York, NY, 1990, ISBN 0-422-23842-8, 395 pp., \$42.95.

Wagner's book entitled *The Hazardous Waste Q & A*, is an excellent reference book. It would be especially beneficial if it were used as a training guide/personal reference manual for personnel working with, and handling disposed of, hazardous waste. It might also be useful in an introductory college level course on hazardous waste.

The book is specifically geared towards the waste disposal end of the business but would benefit the producer of raw chemicals in several areas. The chapter on transportation would be beneficial to a generator, since it discusses relevant questions about labeling, shipping requirements, placards and spills. Furthermore, contingency plans and financial responsibility are also discussed. Moreover, almost any produced of raw chemicals has some waste to dispose of either from bad batch mixes or spills. Thus, this book would be of value to any plant which produced a raw chemical and/or waste product.

The book is by no means a reference guide to perform emergency spill response. Instead, it is a good overview of typical questions that a generator should ask and know the answers to before responding to an emergency situation. It educates the generator about what he/she is liable for when dealing with the specific materials, that is, it discusses the many laws, rules and regulations that are mandated by the Federal Government. Surprisingly enough, many generators are ignorant of the fact that they are legally responsible for the proper management of the waste and could be prosecuted for mismanagement.

The book is written in a way that is easily understood by a person with limited technical background. Many key terms are used and a lengthy appendix gives very concise definitions. Also, the chapters on Technical Standards