When we think about pollution sources, we tend to picture factories. As it turns out, that's wrong. At least, that's the finding in a very carefully conducted study by UT's David Adelman. He found that industry is not a leading source of air pollution, with two major exceptions. One exception consists of coal-fired power plants (and to a lesser extent industrial boilers). The other exception consists of Houston, which has the greatest concentration of industrial pollution sources in the country. So where is the rest of the pollution coming from?

The other pollution contributors are small but many. Cars and trucks for one. With regard to the leading toxics, dry cleaners and other small sources. The trouble is that it's very hard to regulate these dispersed sources — there are too many of them, and they have too many voters. (You can see the same problem with water pollution, where farms are now leading causes of pollution). The best approach is probably economic — raise the gasoline tax and people will cut back driving. Try getting that through Congress. Cities and states seem equally powerless to address dispersed sources.

Adelman has obviously put a lot of time and effort into developing these statistics. Maybe someone else will come up with different numbers, but at this point, his look pretty convincing. So what to do? Adelman suggests giving control of most industrial sources to the states, while keeping coal-fired plants and a few other major sources federal. As to the small sources, he views the most successful program as federal regulation of new vehicles, which gradually replace more polluting older vehicles. He advocates federal regulation of other products with the same goal. He views the current process for state implementation plans as mostly useless and advocates eliminating the deadlines but having the federal government fund demonstration projects by states to find more effective ways of handling issues like vehicle usage and pollution from dry cleaners. Vanderbilt's Michael Vandenbergh has long advocated greater attention to these dispersed sources, and I agree that more could be done in that sphere (see here).

This would be a radical shift in the current regulatory regime — though an undoubtedly popular one among industry, state regulators, and law students who suffer under the weight of having to master the current regulatory complexities. I'm not ready to sign on to such major changes on the basis of a single paper. But if Adelman's findings hold up, we will all have some hard thinking to do about the way the Clean Air Act is structured.