



HW88-0032416

From R&D CENTER - 401-3X9
WIN 236-5849
Date August 25, 1982
Subject Asbestos Reporting Requirements

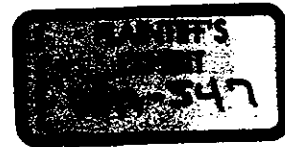
To F. S. Beal - Director, Environmental Affairs - Chatham Center
B. A. Kerns - Manager, Environmental Control - Chatham Center
R. E. Wills - Sr. Counsel, Law Department - 857 Gateway Center
R. Lawrence - Sr. Chief Counsel, Law Department - 1726 Gateway Center
J. F. Gormley - Director, Product Safety - Chatham Center
C. W. Bickerstaff - Manager, Corporate Industrial Hygiene - R&D Center

Please review the attached draft letter to be sent to plant personnel announcing the TSCA 8(a) Asbestos Reporting Requirements and the procedure for filing reports to the EPA. To get the finalized letter distributed by Labor Day, September 6, 1982, all comments should be received by Wednesday, September 1, 1982.

Mark A. Perriello

Mark A. Perriello, CIH
Sr. Industrial Hygiene Engineer

/jme
Attachments



Discard Date:

03114296



FORM 31047

WIN 1000-0032416
November 1982

November 1992

UNITED STATES AIR FORCE

DRAFT COPY

SUBJECT: ASBESTOS REPORTING REQUIREMENTS

TO: PLANT MANAGERS -- MML-5A
ENGINEERING MANAGERS -- FML-36
PURCHASING MANAGERS -- FML-28

WDBB-0032417

The Federal Environmental Protection Agency (EPA) published in the July 30, 1982 Federal Register the final rule on Asbestos Reporting Requirements under authority of Section 8(a) of the Toxic Substances Control Act (TSCA). The effective date of this rule was August 30, 1982 and applies to United States asbestos manufacturers, processors and importers. The EPA requires individual plant sites to report quantities of asbestos used in manufacturing a product, processing bulk asbestos and asbestos mixtures, and the importation of bulk, mixtures, and articles containing asbestos.

EPA designated two groups for reporting purposes: the Primary Processor and the Secondary Processor.

The Primary Processors are persons engaged in mining, milling and importing bulk asbestos, or who process bulk asbestos to form an asbestos mixture or product such as asbestos paper. The primary processor must report on EPA Form 7710-36 "Reporting Commercial and Industrial Uses of Asbestos" within 90 days of the effective date.

The Secondary Processors are persons who import asbestos mixtures or who start with asbestos mixtures and incorporate it into a product. An example of a secondary processor would be cutting asbestos cement sheets into gaskets for incorporating into a valve or pump. The secondary processor must report on EPA Form 7710-37 "Reporting Secondary Processing and Importation of Asbestos Mixtures" within 60 days of the effective date. The EPA will then select a sample of respondents from the secondary processors to complete the Primary Form 7710-36.

03114297

NOVEMBER 1992

STANDARD
AIR
TESTING

Both EPA Forms 7710-36 and 7710-37 and instructions on completing the form are attached. Each respondent is to complete the relevant sections of the form depending on activities of the plant. Some primary processors are also secondary processors and will have to complete both sections of the Primary Form. Be sure to use the correct codes from the Instruction Section when completing either form. Several Westinghouse products which contain asbestos are listed in the attached table.

Exemption from Reporting:

The EPA has exempted certain classes of potential respondents from the requirements of the rule. The exempt class include:

1. Companies employing 10 or fewer employees.
2. Secondary Processors who apply, assemble, install, erect or consume asbestos products without modifying or fabricating the asbestos product. Example--an appliance manufacturer who installs electric motors containing asbestos components would be exempted.
3. Persons who repair articles, repackage asbestos mixtures without modification or who engage in construction work.
4. Persons who are distributors and do not manufacture, process or import bulk asbestos or asbestos products.
5. Persons who are "end users" of bulk asbestos or asbestos products and do not further distribute such items in commerce. Example--asbestos welding blanket.

Plant's Responsibility:

Each plant must survey their facility and determine whether the EPA Asbestos Reporting Requirements apply. This initial survey should include a review of purchasing invoices for 1981, any processes involving bulk asbestos or mixtures, and products imported into the United States that contain

HWBB-0032418

03114298

NOVEMBER 1992
JUN 13 1992
AIR/AMIS

asbestos. Be aware many asbestos mixtures or products use tradenames such as Transite, Monobestos, etc. Review the attached table on Asbestos Tradenames. If the EPA Asbestos Reporting Requirements apply to your plant, then a decision must be made as to which form applies. Then complete either EPA Form 7710-36 or 7710-37 and send completed form to Headquarters Environmental Affairs by October 11, 1982. The EPA 7710-36 asks for detailed data on products, importation, worker exposures, waste and disposal and pollution control equipment. Therefore, allow sufficient time to gather this data and complete this form.

If the EPA Asbestos Reporting Requirement does not apply, then sign the attached Negative Declaration and return to Headquarters Environmental Affairs.

Headquarters Environmental Affairs Responsibility:

Headquarters Environmental Affairs will coordinate the corporate-wide response on importation of asbestos and will review the individual completed responses. This information will then be sent directly to EPA. The Environmental Affairs Staff will be available for consultation in completing these forms.

Frank S. Beal, Director
Headquarters Environmental Affairs

Attachments

NWBB-0032419

03114299

MINUTE ALIBR/AMIS November 1992

ASBESTOS

(W) USES OR PRODUCTS

Epoxy Resins

Tape

Gaskets

Cements

Transformer filler - dry type

Relays

Elevator brakes

Electronic tubes

Packing for fan vane, circuit breakers

Coil support wedges

Floodlights

Insulation on wire

HW88-0032420

03114300

November 1992

UNITED STATES AIR FORCE

NEGATIVE DECLARATION

In accordance with the EPA Toxic Substances Control Act Section 8(a) "Asbestos Reporting Requirements", we have reviewed our purchases and processes for the year 1981. According to our records and to the best of our knowledge, asbestos was not used at this facility in such a manner as defined as a primary processor, secondary processor or importer.

Signed by: _____ Title: _____

Plant: _____ Date: _____

HW88-0032421

03114301

November 1992

IN THE AIRMAILS

ASBESTOS TRADENAMES

MWBB-0032422

<u>Name</u>	<u>(W) Material Number</u>
Accopac AS-428	42261AJ
Anchor 317	41521DA
Asbestocite	46316CJ
Aribest C	
Calidrin RG-100	
Calidrin RG-144	
Calidrin RG-600	
Cassiar AK	
Duroid 3700	42261AB
Ebony	46316CA
Garlock 901	42241AD
Garlock 7021	42241AF
Garlock 7021 Rock Hard	42241AG
K6-30	
K68	42251BC
Mannitemp 111	42331CB
Mannitemp 115	42331CC
Mannitemp 117	42331CD
Metaxite	
Monobestos	46316CN
Mysorite	
Nicolet	46316CK
Ohmstone	46316CC
Plastibest 20	
Quinterra 5	42331BC
Quintex 1	42331AJ
Sealsafe Novatex Tape 2132N	41521AD
Service Sheet 60	42241AE
Super Twilstele Joining 200	41521EM
Sylodex	
Transite	46316CE
Valvolite 20	41521DA
Weldgard Commercial 2225	41511BR

03114302

O.M.B. No. 1002-0179-Approved March, June 20, 1982

EPA United States Environmental Protection Agency

REPORTING COMMERCIAL AND INDUSTRIAL USES OF ASBESTOS

Please read the accompanying instruction booklet before completing this form. Note that a separate form must be submitted for each plant site, except that later reports or reports of bulk asbestos may be reported in a consolidated corporate report. The instructions provide further directions.

When this form is complete, attach it to the preaddressed envelope provided. Should you have any questions, please contact the Industry Asbestos Office set box at 8001 424-8064 or in Washington, D.C. at (202) 554-1404.

All persons who are each secondary processors, importers of asbestos materials, or importers of articles containing asbestos components and report in the first phase on EPA Form 7710-37 "Phase I: Secondary Processing and Importation of Asbestos Materials." These persons will report in this form, EPA Form 7710-38, after their receipt of notice to that effect from EPA (see 40 CFR 763.201 (d)).

When completed send this form to:

U.S. Environmental Protection Agency
P.O. Box 3679
Research Triangle Park, NC 27709

A(1). RESPONDENT IDENTIFICATION

1. Company Name _____ Plant site name _____

Address Number and street _____

City _____ County _____ State _____ ZIP code _____

2. Principal contact (Name) _____ (Job title) _____ Other telephone (Local area number) extension _____

3. If applicable - Record main identification number _____

4. If applicable - Record the name and address of the parent company on which is responsible for the final management of the reporting site

Name of parent corporation _____

Address Number and street _____

City _____ County _____ State _____ ZIP code _____

5. Record the total number of years during which the manufacture and/or processing of asbestos has been conducted at the reporting site _____ Number of years _____

A(2). RESPONDENT ACTIVITY

6. Identify your activity from the definitions in the instruction booklet and mark (X) the box next to the category below that best describes your activity. Mark (X) next to all activities that you are reporting on this form. You must at least consider the activities of the reason that are indicated next to the box you mark, and you must complete other sections if you conduct that activity. For example, if at the same plant site you process bulk asbestos to produce an asbestos material and you also process an asbestos material that is made at another location, then you as a primary processor must also complete part D as a secondary processor.

All persons who are miners, fabricators, primary processors, or processors of bulk asbestos must report their asbestos activities at all plant sites.

Mark (X) your activity(ies) that is reported in this form.

☐ Mine and mill - Complete parts A, B(1), G, H, I, J, K (B(3), if applicable)

☐ Primary processor - Complete parts A, C, G, H, I, J, K (B(3), if applicable)

☐ Importer of bulk asbestos - Complete parts A, B(2) (B(3), if applicable)

☐ Secondary processor - Complete parts A, D, G, H, I, J, K

☐ Importer of asbestos materials - Complete parts A and E

☐ Importer of article(s) containing asbestos component(s) - Complete parts A and F

A(3). CERTIFICATION FOR CLAIMS OF CONFIDENTIALITY

You may claim as confidential any information you submit on this form. The instructions provide specific instructions on how to assert claims of confidentiality. For information which you submit in attachments to this form, provide a copy which clearly indicates the information you wish to claim confidential.

Special is provided at the end of each line to claim information on that line confidential.

For any information on this form you claim as confidential, you must certify that the information is confidential. The signature below will attest to the truth and accuracy of the following statements. All four statements must be true about any information you claim confidential.

1. My company has taken measures to protect the confidentiality of the information, and I will continue to take those measures.
2. The information is not, and has not been, reasonably obtainable by other persons (other than governmental bodies) by using legitimate means (other than discovery based on a showing of special need and in a public or quasi-public proceeding) without my company's consent.
3. The information is not publicly available.
4. Disclosure of the information claimed as confidential would cause substantial harm to my company's competitive position.

7. Signature of authorized official _____ Date _____

B(1). PRODUCTION OF BULK ASBESTOS

QUANTITY OF BULK ASBESTOS MINED OR MILLED

Enter in short tons the amount of bulk asbestos you produced (mined or milled) for 1979 through 1981.

Year	Report in short tons						Other (2)
	Chrysotile	Crocidolite	Amosite	Anthropophyllite asbestos	Tremolite asbestos	Actinolite asbestos	
1979							
1980							
1981							

B(2). IMPORTATION OF BULK ASBESTOS

QUANTITY OF BULK ASBESTOS IMPORTED

Enter in short tons the amount of bulk asbestos you imported for 1979 through 1981. Mark (2) only: ☐ This is a corporate consolidated report. ☐ This is a plant site report.

Year	Report in short tons						Other (2)
	Chrysotile	Crocidolite	Amosite	Anthropophyllite asbestos	Tremolite asbestos	Actinolite asbestos	
1979							
1980							
1981							

B(3). EXPORTATION OF BULK ASBESTOS

QUANTITY OF BULK ASBESTOS EXPORTED

Enter in short tons the amount of bulk asbestos you reported for 1979 through 1981. Mark (2) only: ☐ This is a corporate consolidated report. ☐ This is a plant site report.

Year	Report in short tons						Other (2)
	Chrysotile	Crocidolite	Amosite	Anthropophyllite asbestos	Tremolite asbestos	Actinolite asbestos	
1979							
1980							
1981							

EPA Form 7710-38 (5-12-82)

HWBB-0032423

03114303

November 1992

JUN 16 1982 AIRMAILS

Page 2

C. PRIMARY PROCESSOR PRODUCTION

Enter the following information for each type of and product that you shipped from your plant site. Classify your end products according to the list below.

Code number	Product name	Type of asbestos type (1)	Year	Quantity of asbestos shipped (2)	Product description		Container size (3)
					Quantity	Unit of measure	
		☐ Chrysotile ☐ Amphibole	1979				
		☐ Chrysotile ☐ Amphibole	1980				
		☐ Chrysotile ☐ Amphibole	1981				
		☐ Chrysotile ☐ Amphibole	1982				
		☐ Chrysotile ☐ Amphibole	1983				
		☐ Chrysotile ☐ Amphibole	1984				
		☐ Chrysotile ☐ Amphibole	1985				
		☐ Chrysotile ☐ Amphibole	1986				
		☐ Chrysotile ☐ Amphibole	1987				
		☐ Chrysotile ☐ Amphibole	1988				
		☐ Chrysotile ☐ Amphibole	1989				
		☐ Chrysotile ☐ Amphibole	1990				
		☐ Chrysotile ☐ Amphibole	1991				

68. Estimate the percentage of the total value shipped from the plant site reported here as primary processor production in 1981.

D. SECONDARY PROCESSOR PRODUCTION

Enter the following information for each type of and product that you shipped from your plant site. Classify and products and asbestos materials according to the list in the table.

Code number	Product name	Year	Quantity	Unit of measure	Code number	Product name	Year	Quantity	Unit of measure	Code number	Product name	Year	Quantity	Unit of measure	Code number	Product name	Year	Quantity	Unit of measure

69. Estimate the percentage of the total value shipped from the plant site reported here as secondary processor production in 1981.

E. IMPORTATION OF ASBESTOS MIXTURES

Enter the following information for each type of asbestos mixture that you imported in 1981. Classify your imports according to the list in section C or D.

Code number	Product name	Type of asbestos	Year	Quantity	Unit of measure	Value of imports in \$ millions	Container size (3)

03114304

Page 2

U.S. ENVIRONMENTAL PROTECTION AGENCY		COMPANY NAME AND ADDRESS (Same as reported in form 1 on page 1)									
REPORT OF COMMERCIAL AND INDUSTRIAL USES OF ASBESTOS Continued											
F. IMPORTATION OF ARTICLES CONTAINING ASBESTOS COMPONENTS Enter the following information for each article that you imported in 1981. Classify your imports according to the lists in section C or D.											
Article name (Enter one article or four) (1)		Total annual imports (2)				Asbestos composition (Also enter the fiber composition) (3)	Comments (4)				
Code number	Article name	Year	Quantity	Unit of measure	Value U.S. dollars						
		1979									
		1980									
		1981									
		1979									
		1980									
		1981									
		1979									
		1980									
		1981									
G. EMPLOYEES Record the number of employees at the reporting site in each of the categories below. Count each employee in one category only.											
(1) TOTAL number of employees at plant site (Sum of 2, 3, 4, and 5)	Number of employees	Comments (See 1F)									
(2) Number of production employees											
(3) Number of employees in shipping, receiving, and moving											
(4) Number of maintenance employees											
(5) Number of other employees											
H. SUMMARY OF CURRENT WORKER EXPOSURES This section requires you to report, by category of production workers, the arithmetic mean of the 8-hour time weighted average (TWA) and ceiling concentrations exposure levels for all employees in the reporting site. Report for all employees for whom you have determined a TWA and according to each production line making the reported products. The instructions include a evaluation for making necessary calculations (see Appendix B).											
Site product fiber name (1)	Reporting activity (2)	Production work category (3)	Number of employees (4)	8 hr time weighted average					Ceiling concentration (See Appendix B)	Comments (5)	
				Arithmetic mean of exposures (TWA) (5a)	Exposure duration (5b)	Total number of exposures (5c)	Number of exposures above TWA (5d)	Number of exposures above ceiling (5e)			
Dry asbestos	Manufacture and finishing	Basic operations (includes all employees working in this category including maintenance) and operations includes all employees working in production areas of plant									
	Primary production and secondary production	Fiber production operations includes spinning, drawing, bagging, baling, etc.									
Wet asbestos	Manufacture and finishing	Wet mechanical operations includes machining, drawing, cutting, grinding, baling, etc.									
	Primary production and secondary production	Wet mechanical operations includes machining, drawing, cutting, grinding, baling, etc.									
Dry asbestos	Manufacture and finishing	Fiber production operations includes spinning, drawing, bagging, baling, etc.									
	Primary production and secondary production	Fiber production operations includes spinning, drawing, cutting, grinding, baling, etc.									
Wet asbestos	Manufacture and finishing	Wet mechanical operations includes machining, drawing, cutting, grinding, baling, etc.									
	Primary production and secondary production	Wet mechanical operations includes machining, drawing, cutting, grinding, baling, etc.									
(1) Sampling and analysis methods											
☐ Mark this box if you use the NIOSH method to sample airborne concentrations of asbestos fibers in the workplace and analyze measurements. See NIOSH Pub. No. 79-1271.											
If you utilize other sampling and analysis methods, enter the appropriate codes for these methods listed in the appendix located under part I.											
(11) Enter the lowest detectable level of the measurements that your company expects to obtain by the sampling and analysis methods. Measurements below this level should be considered as "undetectable" for the purposes of this rule.											
I. MEASURING ASBESTOS EMISSIONS OR FIBER RELEASE											
EPA Form 7740-20 of 11-82											
☐ Yes enclosed is a separate report for this section concerning measuring asbestos emissions. ☐ No separate report											

HWBB-0032425

03114305

JUNE 1992 / ALBERTA / NOVEMBER 1992

MBB-0032426

Page 4

J. WASTE AND DISPOSAL

Enter the following information for each and product you report in section B(1), C, and D. If you cannot provide information by and product, provide information according to the form of waste treatment:

Code number	One product (1)	Form of waste (solid, slurry, liquid or gas, hazardous waste, or other waste) (2)	Total annual quantity of waste (short tons) (3)	Average annual quantity (short tons) (4)	Disposal site (5)				Method of disposal (6)	Container (short ton) (7)
					Type of land disposal facility (see instructions) (5a)	Location (5b)	Ownership (5c)	Permitted (5d)		
	☐ Not product report ☐ Form of waste report				☐ Landfill ☐ Surface impoundment ☐ Deep well ☐ Other (specify) (5a)	☐ Private ☐ Public (5b)	☐ Private ☐ Public (5c)	☐ Yes ☐ No (5d)		
	☐ Not product report ☐ Form of waste report				☐ Landfill ☐ Surface impoundment ☐ Deep well ☐ Other (specify) (5a)	☐ Private ☐ Public (5b)	☐ Private ☐ Public (5c)	☐ Yes ☐ No (5d)		
	☐ Not product report ☐ Form of waste report				☐ Landfill ☐ Surface impoundment ☐ Deep well ☐ Other (specify) (5a)	☐ Private ☐ Public (5b)	☐ Private ☐ Public (5c)	☐ Yes ☐ No (5d)		

(7) You may, at your option, use a separate summary only waste you wish to ensure that waste does not release airborne toxic. ☐ Yes, separate report. ☐ No, separate report.

K. POLLUTION CONTROL EQUIPMENT

On separate lines enter information about each piece of air pollution control equipment used to control emissions from your plant site. ☐ Continued

Type number	Type of equipment (see instructions) (1)	See enough volume and concentration (2)	Design flow (3)	Design efficiency (4)	Normal operating efficiency (5)	Quantity collected (6)	Source of emissions (7)	State or territory (8)	Special features (9)
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)

(11) Enter the design of plant exhaust or that is treated by the equipment listed above.

Continuation of item process

OMB Form 7750-20 (4-12-81)

BILLING CODE 5545-05-C

03114306

U
S
E
C
O
N
F
I
D
E
N
T
I
A
L
I
N
F
O
R
M
A
T
I
O
N
P
R
O
H
I
B
I
T
E
D
B
Y
F
E
D
E
R
A
L
R
E
G
I
S
T
R
A
T
I
O
N
A
C
T
O
F
O
C
T
O
B
E
R
1
9
5
0

Instruction Booklet—Reporting Commercial and Industrial Uses of Asbestos, EPA Form 7710-36

I. Introduction and Reporting Schedule

A. Introduction

These instructions are for companies that mine and/or mill commercial asbestos, or process or import an asbestos product, and are required to submit EPA Form 7710-36 under 40 CFR Part 763, Subpart D. Data must be reported to the extent that they are known to or reasonably ascertainable by the submitter based on factual information that either is available in company files, or can be obtained without unreasonable burden or cost. Importers must report information in their possession, but need not contact foreign manufacturers for missing information.

1. *Fill in all blocks.* Fill in all blocks in the portions of the form that must be completed. Write "N/A" (not applicable) in large, bold letters on the first line of any section that does not have to be completed.

If data for a portion of the form that must be completed are not available, consult part II of these instructions, "Missing Information."

EPA will check all forms for completeness. Incomplete forms may be returned for completion. If only a few items are incomplete, EPA may call the designated Technical Contact to determine the correct answer rather than return the form.

2. *Relevant Definitions.* Reporting requirements are determined by the company's asbestos activity in 1981 (i.e., miner and/or miller, importer of bulk asbestos, primary processor of asbestos, secondary processor of asbestos, importer of asbestos mixtures, or importer of articles containing asbestos components). Definitions for reporting activities and other terms used in this form may be found in Appendix A.

3. *Appropriate Number of Forms.* A separate form must be submitted for each site. For example, a miner and/or miller at one site who is a primary processor at a different site must submit a form for each site.

All asbestos activities conducted at each site must be reported. A primary processor who also imports asbestos at a single site must report both the primary processing and importing activities on the same form.

4. *Additional Space.* If additional space is needed to report all required information, responses can be entered on a reproduction of the pertinent portion of the form and the continuation should be noted on that part of the form.

B. Portions of the Form To Complete and Reporting Schedule

1. *Miners and/or Millers.* Miners and/or millers must complete parts A, B(1), G, H, I, J, and K of the form. Complete B(3) if applicable. Report for each plant site on a separate EPA Form 7710-36 and submit within 90 days of the effective date of the rule.

2. *Primary Processors of Asbestos.* Primary processors must complete parts A, C, G, H, I, J, and K of the form. Complete B(3) if applicable. If a facility processes an asbestos

mixture that is made at a different plant site, part D must also be completed. Report for each plant site on a separate EPA Form 7710-36 within 90 days of the effective date of the rule.

3. *Secondary Processors of Asbestos.* Persons who are solely secondary processors must submit EPA Form 7710-37, "Reporting Secondary Processing and Importation of Asbestos Mixtures" within 90 days of the effective date of the rule. If the company is selected and notified by certified letter to complete EPA Form 7710-36, complete parts A, D, G, H, I, J, and K of the form for submission within 90 days of receiving notification.

4. *Importers of Bulk Asbestos.* Importers of Bulk Asbestos must complete at least parts A and B(2) of the form. Complete B(3) if applicable. Report all activities that involve asbestos on EPA Form 7710-36 within 90 days of the effective date of the rule.

5. *Importers of Asbestos Mixtures.* Importers of Asbestos Mixtures must submit EPA Form 7710-37 "Reporting Secondary Processing and Importation of Asbestos Mixtures" within 90 days of the effective date of the rule. If the company is selected and notified by certified letter to complete EPA Form 7710-36, complete parts A and E of the form and submit within 90 days of receiving notification.

6. *Importers of Article(s) Containing Asbestos Component(s).* Importers of Article(s) Containing Asbestos Component(s) must submit EPA Form 7710-37 "Reporting Secondary Processing and Importation of Asbestos Mixtures" within 90 days of the effective date of the rule. If the company is selected and notified by certified letter to complete EPA Form 7710-36, complete parts A and F of the form and submit within 90 days of receiving notification.

II. Missing Information

It is important to fill in all blocks in the portions of the form that must be completed. If the required information either cannot or need not be provided, enter one of the notations described below. Write "N/A" (not applicable) in large bold letters on the first line of any section that is not required. Only use "0" to report a quantity of zero.

Enter the following notations if the requested data are unknown, previously submitted to EPA or CPSC, or submitted as a corporate report.

UNK—The requested data are unknown and not reasonably ascertainable; or, not in the possession of the importer. This may be the case for information from a specific year or about a specific type of data that is required.

CPSC—The requested data have been previously reported to the Consumer Product Safety Commission (CPSC) in response to the December 22, 1980 Federal Register notice "Consumer Product Containing Asbestos: General Order for Submission of Information." (45 FR 84384). Use this notation only for the specific items of information that were submitted to CPSC. Do not use this notation in lieu of reporting of CPSC was instructed not to share the submitted information with EPA at the time of response to the CPSC General Order.

CORP—The requested data have been submitted for sections B(2) and B(3) (importation and exportation), in a corporate consolidated report. Inform the plant site management that a corporate consolidated report has been submitted and instruct those plant site(s) to enter "CORP" in sections B(2) and B(3).
EPA—The requested data have already been submitted to EPA in the format of the reporting form as proposed or promulgated.

III. Specific Instructions for Form 7710-36

A(1). Respondent Identification

1. Enter company name, and name and complete address of plant site.
2. Enter name, job title, and telephone number of the principal technical contact person to be contacted by the EPA for answers to any questions about the submitted form.
3. Miners must record the mine identification number assigned by the Mining Safety and Health Administration.
4. Enter name and address of the parent corporation responsible for fiscal management of the reporting site.
5. Enter the total number of years asbestos has been manufactured or processed at this plant site, through the date of this report.

A(2). Respondent Activity

Review the definitions in Appendix A of these instructions to ascertain required reporting activity(ies). Check the appropriate activity(ies) that is performed at this site. Complete the portions of the form listed next to the activities checked.

For example, a primary processor who makes an asbestos mixture and then processes the asbestos mixture at the same site to make a different end product should report the production of the final end product in part C. Only complete part D of the form if the facility processes an asbestos mixture that is made elsewhere.

A(3). Confidential Business Information

Any reported information may be claimed as confidential business information. When submitting the form, mark (X) in the space provided on each line of the form that contains confidential information. Additionally, an authorized company official must sign the "Certification for Claims of Confidentiality" to certify that the four statements on the form apply to all information claimed as confidential.

B(1). Production of Bulk Asbestos

Enter, in short tons, the amount of bulk asbestos produced (mined or milled), in 1979, 1980, and 1981.

B(2). Importation of Bulk Asbestos

Enter, in short tons, the amount of bulk asbestos imported in 1979, 1980, and 1981. Report all imports entering the U.S. Customs territory that are declared under Tariff Schedule of the United States, Annotated (TSUSA) Number 518.1110-518.1160. Mark in the appropriate box the source of this information.

03114307

NW88-0032427

FEDERAL REGISTER

B(3). Exportation of Bulk Asbestos

Enter, in short tons, the amount of bulk asbestos exported in 1979, 1980, and 1981. Mark in the appropriate box the source of this information.

C. Primary Processor Production

Individually list the product subcategories made and shipped from the plant site in 1979, 1980, and 1981 that incorporate bulk asbestos as a starting material. Read instructions for items 1, 2, and 3 before completing this section to ensure sufficient space for entries.

(1) *End Product Shipped.* Locate on the list of "Asbestos Mixture Product Subcategories" the most specific name that describes the end product(s) shipped from the plant site. Enter the corresponding code number for each product subcategory being reported. If the listed product subcategory name is not adequately descriptive, write in a generic name next to the code number. If the product is not listed, write in the appropriate code for "other" and a generic name for the product. Do not enter a trade name as a generic name. Do not report anything more specific than a product subcategory.

(2) *Type of Asbestos Fiber Consumed.* Mark (X) the fiber type(s) that is, or has been, used in production of reported product subcategory. Use one block for each fiber type incorporated into each product subcategory. If more than one type of fiber(s) is used for a product, mark (X) the additional fiber in the next block and mark (X) the continuation box in column 1. Do not list the same product subcategory twice.

(3) *Quantity of Asbestos Consumed.* For each type of asbestos, enter, in short tons, quantity consumed in 1979, 1980, and 1981.

(4) *Total Annual Production.* Record the total annual production quantity of each reported product subcategory in 1979, 1980, and 1981. Production quantities will be expressed in the units of measure indicated on the form next to the listed end product, as used by the Bureau of Census. If census units are not applicable, report production in short tons.

(5) *Value Shipped.* Record the total annual value shipped (in thousands of U.S. dollars) for each reported product subcategory in 1979, 1980, and 1981. These figures must be separated to show domestic sales and export sales (i.e., sales distributed outside the U.S. Customs Territory). If the breakdown is unknown, report total sales as "Domestic" sales, and write "UNK" under "Exports."

The valuation of products shipped should be based on the net selling value, f.o.b. plant, after discounts and allowances, and exclusive of freight charges and excise taxes.

When reporting products transferred to other establishments within the same company, the shipping plant should assign the full economic value to the transferred products. Include all direct costs of production and a reasonable proportion of all other costs and profits.

(6) *Percentage of Total Value Shipped.* Estimate the percentage of end products shipped that reflect primary processing of asbestos in 1981.

D. Secondary Processor Production

Individually list the product subcategories made and shipped from the plant site in 1979,

1980, and 1981 that incorporated an asbestos mixture as a starting material. Read the instructions for items 1, 2, and 3 before completing this section to ensure sufficient space for entries.

(1) *End Product Shipped.* Locate on the list of "Typical Terms for Products Made from Asbestos Mixtures" the most specific subcategory name that describes the product. Enter the corresponding code number for each product subcategory being reported. If the product name listed is not adequately descriptive, write in a generic name next to the code number. If the product is not listed, enter the appropriate code for "other" and write in a generic name for the product. Do not enter a trade name as a generic name. Do not report anything more specific than a product subcategory.

(2) *Total Annual Production (Quantity by Census Unit of Measure).* Record the total production of the reported product subcategory at this plant site in 1979, 1980, and 1981. Production quantities should be reported in the unit of measure used by the U.S. Department of Commerce, Bureau of the Census, for the 1977 Census of Manufacturers.

(3) *Asbestos Mixture Consumed and Form.* Locate and enter from the list of "Asbestos Mixture Product Subcategories" the code number of the asbestos mixture processed to produce the product subcategory. If the material processed is not listed, then enter the appropriate code for "other" and write the generic name of the asbestos material you process. Indicate the form in which the asbestos starting material is purchased (e.g., roll of paper, 3"x5" sheets, reams of 8"x11" sheets).

Use one block for each asbestos mixture incorporated into the product subcategory. If there is more than one asbestos mixture per product subcategory, list the mixture(s) in the next block(s) and mark (X) the continuation box in column 1. Do not list the same product subcategory twice.

(4) *Function of the Asbestos in Product.* Briefly describe the function of the asbestos in the product. Examples of possible asbestos functions are: rot resistance, heat insulation, fire shield, electrical insulation, dimensional stability, filler, or tensile strength.

(5) *Annual Consumption of Asbestos Mixtures.* Record the total annual quantity and specify Census Bureau unit of measure and the total annual cost (in thousands of U.S. dollars) of the asbestos mixtures consumed in 1979, 1980, and 1981.

The value of the materials consumed should be based on the delivered cost, i.e., the amount paid or payable after discounts and including freight and other direct charges incurred in acquiring the materials. Charges include purchases, transfers from other establishments of the company, and withdrawals from inventories.

Materials transferred to the plant site from other plants within the company should be assigned their full economic value, as assigned by the shipping plant, plus cost of freight and handling charges.

(6) *Percentage of Total Value Shipped.* Estimate the percentage of end products shipped that reflect secondary processing of asbestos in 1981.

E. Importation of Asbestos Mixtures

Individually list the asbestos mixtures imported to the plant site in 1979, 1980, and 1981. Read the instructions for items 1, 2, and 3 before completing this section to ensure sufficient space for entries.

(1) *Asbestos Mixture.* Locate on the list of "Asbestos Mixture Product Subcategories" the most specific name that describes the mixture imported. Enter the corresponding code number of each product subcategory being reported. If the name of the product subcategory is not adequately descriptive, write in a generic name next to the code number. If the imported product subcategory is not listed, enter the appropriate code for "other" and write in a generic name for the product. List each product subcategory on a separate line. Do not enter a trade name as a generic name. Do not report anything more specific than a product subcategory.

(2) *Asbestos Fiber Content.* Mark (X) the type of asbestos fiber in the imported asbestos mixture and enter the total quantity of asbestos per unit of the mixture (the unit used to report quantity imported). The quantity of asbestos should be reported in pounds. If these data are not available, mark (X) "UNK."

Use one block for each type of fiber that is in the imported mixture. If the mixture contains more than one type of asbestos fiber, list the additional fiber(s) in the next block(s) and note the continuation in column 1. Do not list the same mixture twice.

(3) *Total Annual Imports.* Record the total annual quantity of each listed product subcategory imported in 1979, 1980, and 1981.

Quantities will be expressed in the units of measure used by the U.S. Bureau of the Census or according to the unit used to report importation to the U.S. Customs Service.

Record the total annual value imported (U.S. dollars) for each product in 1979, 1980, and 1981. This figure can be drawn from the U.S. Customs Service entry forms as the "Entered Value in U.S. Dollars" or "Value."

F. Importation of Article(s) Containing Asbestos Component(s)

Individually list the articles containing an asbestos component that were imported in 1979, 1980, and 1981. Only report information relating to imported product subcategories listed under "Typical Terms for Products Made from Asbestos Mixtures." If the component was reported on EPA Form 7710-37 during Phase 1, use the same code(s) and generic name(s) as reported on that form. Read the instructions for items 1, 2, and 3 before completing this section to ensure sufficient space for entries.

(1) *Article Name.* Locate on the list of "Typical Terms for Products Made from Asbestos Mixtures" the most specific name that describes your product. If the listed product name does not adequately describe your product, write in a generic name next to the code number. List each product on a separate line. If the imported product is not listed, enter the appropriate code number for "other" and write in a generic name. Do not enter a trade name as a generic name.

(2) *Total Annual Imports.* Record the total number of units that were imported in 1979,

November 1992

STAIR AIMS

NWBB-0032428

03114308

tures
mixtures
1980, 1981, and
items 1, 2, and
to ensure

on the list of
categories
scribes the
responding
category
the product
descriptive,
the code
subcategory
code for the
category on a
te name as a
thing more
ary.
rk (X) the
ried
tal quantity
e (the unit
The
ported in
lable mark

iber that is
ture
bestos
the next
in column
ca.
l the total
uct
and 1981,
e units of
the
to report
vice.
orted
9, 1980,
from the
the
Value."

ing an
led in
rmation
ories
cta

7710-
s) and
rm
d 3

ame
d
rife
ext to

not
or for
not
oial
99.

1980, and 1981. Quantities will be reported in the unit of measure that was used to declare the merchandise upon entry into the U.S. or by the U.S. Bureau of Census for the 1977 Census of Manufacturers. Enter the value of the imported merchandise in U.S. dollars.

(3) **Asbestos Component(s).** List all asbestos components contained in the imported article by name, or by describing the mixture making up the component. Use one block for each asbestos component. If the imported article contains more than one asbestos component, list the component in the next block and note the continuation in column 1. Do not list the same article twice.

G. Employees

Classify all employees as of January 1981 into the following categories. In items 2-5, **COUNT EACH EMPLOYEE IN ONLY ONE CATEGORY.** In this section, report numbers of individuals without regard to the number of hours worked.

(1) **Total Number of Employees.** Enter the total number of employees (the sum of items 2, 3, 4, and 5) who worked at the reporting plant site as of January 1981. If you employed seasonal workers in 1981, add the number of those workers to the total.

(2) **Number of Production Employees.** Enter the number of production employees who work in areas where **ASBESTOS IS MANUFACTURED OR PROCESSED.** Do not include plant site production employees who work in separate areas where no asbestos fiber or asbestos product is processed. This number must equal the total number of employees reported in Section H, for all production lines.

(3) **Number of Shipping, Receiving, and Moving Employees.** Enter the number of employees involved with shipping, receiving, or moving asbestos fiber or asbestos-containing products.

(4) **Number of Maintenance Employees.** Enter the number of maintenance employees who perform maintenance tasks in work areas where asbestos fiber, asbestos products, or asbestos waste are processed, stored, or moved.

(5) **Number of Other Employees.** Enter the number of other employees at the location that are not counted in items 2-4.

H. Summary of Current Worker Exposures

Report, by category of production workers, the arithmetic mean of the 8-hour time weighted average (TWA) exposure level for all employees at the reporting site for whom a TWA has been determined. Appendix B describes how to perform the calculations and includes a worksheet.

Summarize Only Existing Monitoring Data: Additional Monitoring Is Not Required

Submit a single TWA value (arithmetic mean) to summarize existing monitoring data that will describe current exposure levels that employees in general production categories may experience while working on each production line. Summarize and report monitoring data separately for workers on the production line for each end product subcategory that has been reported as either "Primary Processor Production" (part C) or "Secondary Processor Production" (part D). Miners and millers must provide a single,

separate TWA value for the mine and for the mill.

For each **End Product Subcategory**, enter the number of workers who perform the production operations listed below. Only count employees who were counted as production workers in item 2 of part C of the form. Each employee is to be counted *only one time*, in the operation and product line that is the employee's primary assignment.

After grouping the 8-hour TWAs, follow the detailed instructions in Appendix B to find the mean, standard deviation, number of measurements, and ceiling ranges for each group.

Note.—The sum of all production employees listed in column 4 *must equal* the number of production employees entered in item 2 of part G.

(1) **End Product, Primary or secondary processors** must enter the same code number(s) and generic name(s) they listed in part C or D of the form. Miners and/or millers do not complete this block.

(2) **Respondent Activity.** Determine applicable category of activity.

(3) **Production Work Category.** Divide production employees into the Production Work Categories for each end product subcategory. Count mine workers under **Mine Operations** and mill workers under **Mill Operations**.

Fiber Introduction Operations are operations where bulk (raw) asbestos is mixed with or added to a combination of other materials. Primary processors will list employees who handle bulk or raw asbestos fiber. Secondary processors do not use bulk asbestos as a starting material.

Wet Mechanical Operations are operations where asbestos fiber, asbestos mixtures, or asbestos-containing materials are fabricated, modified, or altered, and the asbestos component is wetted to reduce the release of airborne asbestos fiber. This category includes such activities as: machining, sawing, drilling, cutting, grinding, or pulverizing. Count employees whose principal job is to control or work with the tool or machinery performing the operation. Count all asbestos textile workers involved with wet operations here, whether involved in spinning, twisting, or weaving operations.

Dry Mechanical Operations are operations where asbestos fiber, asbestos mixtures, or asbestos-containing materials are fabricated, modified, or altered without any intentional wetting of the material during the operation. This category includes activities such as: machining, sawing, drilling, cutting, grinding, or pulverizing. Count employees whose principal job is to control or work with the tool or machinery performing the operation. Count all asbestos textile workers in dry operations here, whether involved in spinning, twisting, or weaving operations.

Other Production Employees are production employees involved in operations that require handling of asbestos fiber or materials in a manner not covered in the operations described in the other categories. This category will include workers who perform an operation that involves handling an asbestos mixture, such as bonding asbestos-felt-backing for vinyl sheet flooring or injecting asbestos-reinforced plastic into a

mold. Other production workers who be counted in this category include (not limited to) employees who take off a production line, assemble parts drying or rolling operations, or inape weigh, or package asbestos mixtures asbestos-containing products.

(4) **Number of Employees.** Enter the appropriate job classification the number employees working in jobs meeting the general descriptions provided. Count employees *only one time* and only under the job description that best describes their primary duties.

(5) **Arithmetic Mean of Detectable Measurements.** Locate monitoring data for any employees counted in column 4 and group those monitoring data according to the employee's general job classification. Determine the arithmetic mean of those detectable TWA values for each work category. Calculate the mean only to the nearest one-hundredth (e.g., 0.05). The arithmetic mean is the sum of the time-weighted averages divided by the number of time-weighted averages. (See Appendix B for instructions and worksheet for determining the arithmetic mean.) If there are no measurements for workers in a particular work category, write in "No measurements."

(6) **Standard Deviation.** Enter the standard deviation for each arithmetic mean you calculate in column 5. (See Appendix B for instructions and a worksheet for determining the standard deviation.)

(7) **Number of Measurements Used.** For each work category, enter the total number of actual observations (filters) used to determine all of the employee's TWAs in the category. This includes the number of all non-detectable measurements.

(8) **Number of Non-detectable Measurements.** For each work category, enter the number of measurements that are below detectable levels. (Non-detectable levels may not be greater than 0.1 f/cc.)

(9) **Ceiling Concentration Level.** For each work category, enter the range of ceiling concentration levels that were determined. Provide the low and high measurements.

(10) **Sampling and Analysis Methods.** If the company used the NIOSH methodology to sample airborne concentrations of asbestos fibers in the workplace and to analyze measurements (DHEW (NIOSH) Pub. No. 79-127), check the corresponding box on the form.

If the company used other sampling and analysis methods, enter the appropriate codes for those methods listed in the next section of these instructions.

The reporting company has the option to describe in an attachment any additional information that will better describe work practices or other measures instituted to reduce the levels of airborne fibers or to protect workers from exposure to asbestos. Attach any additional materials to this form at the time of submission.

(11) Enter the lowest detectable level of the measurements the company expects to attain by the sampling and analysis methods. (Measurements below this level are considered "non-detectable" for the purposes of this rule.)

03114309

I. Measuring Asbestos Emissions or Fiber Release

If the plant site has applied for a water effluent discharge permit (NPDES Permit), provide the application date and the permit number that was assigned.

Summarize and report separately the results of any measurements or monitoring performed to determine the amount of asbestos fiber released during the production, use, or disposal of asbestos fiber or asbestos products (other than already reported in part H of this form). If attaching any such information for this section, check the "yes" box on the form. If not, mark "X" for no separate report. Where possible, the measurements should characterize the type of fibers found and the fiber size distribution, and should be reported according to the following ranges.

Reports submitted in response to this section should describe the methodologies used to perform any tests, to gather samples, and to analyze samples. If this information has been previously submitted to a Federal agency, do not report again here, but indicate the date and to whom the information was sent, and briefly describe the nature of the information. Where possible, summarize the sampling and analytical methodologies according to the terms and abbreviations listed below.

Fiber size distributions	Analysis methodologies
<1.0	Optical Microscopy
1.0-2.0	PC Phase Contrast Microscopy
2.0-3.0	PA Polarizing Microscopy
3.0-4.0	DS Dispersion Staining
4.0-5.0	OM Other optical microscopy techniques (specify)
5.0-10.0	Electron Microscopy
10.0-20.0	TEM Transmission Electron Microscopy
20.0-30.0	SEM Scanning Electron Microscopy
>30.0	ED Electron Diffraction
	XRS X-Ray Spectrometry
	EM Unknown electron microscopy results
	O Any other analysis methodology (Provide specification)
Sampling Methodologies	
K Konimeter	
TP Thermal Precipitator	
I Impinger	
IM Inlet Impinger	
MF Membrane Filter	
EPA Provisional Methodology	
EPA—"Electron Microscope Measurement of Airborne Asbestos Concentration—A Provisional Methodology," EPA-600/2-77-179 (Revised June 1978).	

J. Waste and Disposal

Entries in this section will account for the waste that is not recycled and results from the production of each type of end product subcategory reported. The percentage of the total waste from the plant site that results from the production of each end product subcategory may be estimated. Report separately the data for each end product subcategory. If unable to determine quantities by product subcategory, report total quantities disposed of for each form of waste.

(1) **Product Line.** Enter the product subcategory code (and generic name if used) for each end product subcategory reported in parts B(1), C, or D. Miners and/or millers need only list the type of bulk asbestos fiber reported in section B(1). If unable to determine wastes by end product subcategory, report according to the form of the waste (see below); enter the name(s) and code(s) from parts C and D. Mark (X) in the appropriate box to indicate that the data is either an "End Product Report" or a "Form of Waste Report."

(2) **Form of Waste.** Record the form of the waste either after completion of the processing or as it leaves the plant site. Report asbestos collected in control devices, such as baghouse fines, on a separate line.

(3) **Total Annual Quantity of Asbestos Waste (Short Tons).** Enter the total quantity, in short tons, of asbestos waste generated by each reported end product production line in 1981. Asbestos waste is a waste product that contains asbestos as some of the total waste. Do not report quantities of waste recycled or reprocessed.

(4) **Average Percent Asbestos.** Record in short tons the average percentage of asbestos (by weight) in the total quantity of asbestos waste. This figure may be an estimate based on previous experience or an extrapolation of production mass balance figures.

(5) **Disposal Site(s).** (a) Type of Land Disposal Facility. Mark (X) one of the following types of land disposal facilities or the asbestos waste of each end product subcategory or form of waste. See the February 5, 1981, Federal Register (46 FR 11128) for comprehensive definitions of the types of facilities.

- **Surface Impoundments**—facilities at which liquid wastes or other liquids are impounded or held. Surface impoundments are generally earthen structures designed to hold an accumulation of liquids or wastes containing free liquid.
- **Waste Piles**—facilities at which wastes, usually in a solid state, are placed on the land for storage or treatment.
- **Land Treatment**—facilities at which wastes (usually in a solid, semi-solid, semi-liquid, or liquid state) are spread on the ground for the purpose of treatment.
- **Landfills**—facilities at which wastes, usually in solid or semi-solid state, are placed into or on the land for permanent disposal.
- **Seepage Facilities**—facilities at which wastes (usually in a liquid, semi-liquid, or semi-solid state) are placed into or on the land for storage, treatment, or disposal. A seepage facility is designed with the objective of discharging liquids into the land. There are four types of seepage facilities:
 - seepage lagoons
 - drying beds
 - seepage pits
 - seepage beds
- **Injection Wells**—facilities at which wastes in a fluid (usually liquid) state are injected into the land under a pressure head greater than the pressure head of the ground water into or above which they are injected for disposal.

03114310

(b) *Location of Disposal Facility*—For each end product subcategory (or form of waste), mark (X) whether wastes are disposed of at this plant site (on-site) or at another site (off-site).

(c) *Ownership of Disposal Facility*—For each end product subcategory (or form of waste), mark (X) whether this disposal facility is owned by reporting company (company), another private company (private), or a municipality (municipal).

(d) *Permitted Hazardous Waste Facility*—For each product subcategory (or form of waste), mark (X) whether the disposal facility is permitted under any applicable State or Federal hazardous waste regulation.

(6) *Method of Disposal*. Briefly describe the specific methods used to dispose of asbestos waste. For example, if you wet the waste and place it in a bag or drum prior to disposal, that should be noted here.

(7) *Additional Information*. Submit any additional information to describe any steps taken during waste disposal to reduce the release of airborne asbestos fibers. If enclosing a separate description, check "Yes" on the form; if not, check "No" in the space provided.

K. Pollution Control Equipment

In this section, provide information on all air pollution equipment located at the plant site to control or remove airborne asbestos fiber. List each piece of equipment on a separate line on the form, even though identical units may be used at the plant site. Use the codes listed in this section for each piece of equipment being reported. For additional space, fill in and attach additional copies of the form. If the company has submitted portions of the required data to EPA previously and the data are still current, enter "EPA" in place of those data, and reference the address where the data were sent and the date they were sent.

(1) *Item Number*. Number each piece of equipment consecutively (one through the total number of pieces of equipment).

(2) *Type of Equipment*. For each item number, enter the appropriate abbreviation from the following list.

- Baghouse (BH)
 - Reverse Air (RA)
 - Pulse Jet (PJ)
 - Shake (S)
 - Other (O)

For example, if the baghouse used is equipped for both reverse air and shake cleaning, enter (BH) (RA) (S).

- Scrubber (S)
 - Venturi (V)
 - Impingement (I)
 - Spray (SP)
 - Other (O)

If the scrubber used is the venturi type, also enter the pressure drop in inches of water in parentheses. For example, if the range of pressure drop, is 40-60 inches, enter (S) (V) (40-60).

- Electrostatic Precipitator (ESP)
- Cyclone (C)
- Multiple Cyclones (MC)
- Other (O)

(3) *Gas Stream Volume and Temperature*. For each piece of equipment, enter the gas volume (in cubic feet per minute) and the operating temperature (in °F). Use actual data for these entries, although estimates or design figures may be used if actual data are unavailable. Ranges (ex: 8,000-10,000 ACFM at 40-180 °F) are also acceptable.

(4) *Equipment Size*. If electrostatic precipitators and/or baghouses are used, enter the total square feet of collecting surface area. For all other types of equipment mark (X) "N/A."

(5) *Estimated Collection Efficiency*. Enter the collection efficiency (percent), or an estimate of this value, of each piece of equipment. Mark (X) either design (D) or actual (A) to indicate basis for response.

(6) *Normal Operating Schedule*. Enter the normal number of operating hours either actual or estimated for each piece of equipment during 1981.

(7) *Quantity Collected Annually*. Estimate the quantity of material in pounds that is (or would be, given the design of the equipment) collected annually by each piece of equipment in 1981. Include all asbestos and non-asbestos materials in the total. If possible, estimate the percent (by weight) of asbestos in the collected material. Mark (X) either design (D) or actual (A) to indicate basis for response.

(8) *Source of Emissions*. Enter a brief description of the source of the emissions such as work area exhaust ventilation, curing oven, mixer, various, etc.

(9) *Stack or Chimney*. Indicate whether the air pollution control device discharges to a stack or chimney; check "Yes" or "No."

(10) *Special Problems*. If there is a special problem with particulate collection or with any specific piece of equipment, discuss it in the space provided. Be sure to indicate which piece of equipment is being discussed.

(11) Estimate the percent of plant exhaust air that is treated by the plant site's pollution control equipment.

Appendix A

Definition of Terms

Several terms are used throughout the reporting form and the instruction booklet to describe the different kinds of asbestos products and how to report them.

Asbestos Mixture: a mixture which contains bulk asbestos or another asbestos mixture as an intentional component. An asbestos mixture can be utilized as a finished product or incorporated into other products.

Bulk Asbestos (or raw asbestos): any quantity of asbestos fiber of any type or grade, or combination of types of grades, that is mined or milled with the express purpose to obtain asbestos. The term does not include asbestos that is produced or processed as a contaminant or an impurity. Asbestos is a group of naturally occurring, inorganic, highly fibrous, silicate minerals, which easily separate into long, thin, flexible fibers when crushed or processed. Included in the definition are the asbestiform varieties of: chrysotile (serpentine); crocidolite (riebeckite); amosite (cummingtonite-grunerite); anthophyllite; tremolite; and actinolite.

IN THE AIRS November 1992

MW88-0032431

03114311

End Product: the product subcategory that is either shipped from the reported site or imported into the United States.

Generic Name: a term that describes the coded product subcategory better than the subcategory name given on the form. If the product subcategory name on the form is adequate, use it.

Importer: a person or facility importing asbestos, in bulk form or as part of a mixture or article, into the customs territory of the United States. This definition includes:

- The person liable for the payment of any duties on the merchandise, or
- An authorized agent on his behalf (as defined in 19 CFR 1.11). Importer also includes, as appropriate:
 - The consignee;
 - The importer of record;
 - The actual owner if an actual owner's declaration and superseding bond has been filed in accordance with 19 CFR 141.20; or
 - The transferee, if the right to draw merchandise in a bonded warehouse has been transferred in accordance with Subpart C of 19 CFR Part 144. For the purpose of this definition, the customs territory of the United States consists of the 50 states, Puerto Rico, and the District of Columbia. When two or more persons meet the same definition of "importer" for the same shipment, the principal in the transaction, not his agent or agents, should report.

Note.—If reporting company purchased in the United States an asbestos product that originated outside the United States, do not report as an importer.

For reporting purposes, there are several classes of importers:

- An **Importer of Bulk Asbestos** imports bulk asbestos into the customs territory of the United States. Imported bulk asbestos is declared to the United States Customs Service upon entry as Tariff Schedule of the United States, Annotated, (TSUSA) numbers 518.1110-518.1180. Importers need report information only to the extent that the information is in their possession.
- An **Importer of Asbestos Mixtures** imports asbestos mixtures into the customs territory of the United States. Imported mixtures include, but are not limited to, merchandise declared to the United States Customs Service upon entry as Tariff Schedule of the United States, Annotated, numbers (TSUSA Number) 518.2-518.3, or other TSUSA Numbers that may pertain to asbestos mixtures.
- An **Importer of Article(s) Containing Asbestos Component(s)** imports an article that contains one or more asbestos components.

Miner and/or Miller of Asbestos: a person who either mines or mills asbestos. Mined or extracted asbestos-containing ore is further milled to produce bulk asbestos. Milling involves the separation of the fibers from the ore, grading and sorting the fibers, or fiberizing crude asbestos ore.

Primary Processor of Asbestos: a person who processes bulk asbestos to make an asbestos mixture or a product that contains asbestos. A primary processor who makes an asbestos mixture and then processes the asbestos mixture at the same site to make a different end product should report production of the final end product. Primary processing includes the mixing or repackaging of raw asbestos fiber.

Product Subcategory: the type of asbestos mixture or the type of end product listed and numbered on the form.

Secondary Processor of Asbestos: a person who processes an asbestos mixture that is then incorporated into that person's end product. Secondary processors use asbestos mixtures that are made at a site other than the site being reported. For instance, asbestos millboard may be purchased by a secondary processor, who could cut that millboard and incorporate it into an appliance.

Appendix B

How To Compute Summaries of Monitoring Data—Instructions and Worksheets

These instructions describe how to compute the arithmetic mean and standard deviation of the TWA values for each category of employees counted in column 4 of part H of the form. It is probably easier to compute the figures by working through one line at a time. For example, a primary processor who has employees working in the fiber introduction area should locate all monitoring data for those employees, and work through question 10 before beginning computations for the next production work category for that end product. A worksheet is attached to these instructions; after completing it, transfer your computations to part H of the form.

I. To compute the "mean" for the TWA values for a production work category, first list all of the TWA values for employees counted in the category. Do not include non-detectable TWA values in the following calculations.

For example, assume the following TWA values (listed in column A) for a production work category:

No.	TWA values	Square of column (A)
1.	1.00	1.00
2.	1.80	2.25
3.	0.50	0.25
4.	1.75	2.06
5.	1.25	1.56
	6.00	8.12

After listing the TWA values in column (A) on the worksheet, square each value and enter the square in column (B) on the worksheet. The squares are used later to compute the standard deviation. Sum both columns.

II. Next, determine the number (N) of values. In this example, N=5.

03114312

Worksheet

1.	No.	(A)	(B)
		<u>TWA Values</u>	<u>Squares of Column (A)</u>
	1.		
	2.		
	3.		
	4.		
	5.		
	Total	_____	_____

II. Number of TWA values (N) = _____

III. Mean = $\frac{\text{Sum of Column A}}{N}$

IV. Variance (V) = $\frac{1}{N-1} [\text{Sum of Column B} - \frac{(\text{Sum of Column A})^2}{N}]$

$$= \frac{1}{\boxed{}} \left[\boxed{} - \frac{\boxed{}^2}{N} \right]$$

V. Standard Deviation (SD) = $\sqrt{V}$ = $\sqrt{}$

HW88-0032433

03114313

III. The "mean" is the sum of the TWA values in column A divided by the number of values (N).

In this example:

$$\text{Mean} = \frac{\text{Sum of TWA Values}}{N} = \frac{6.00}{5} = 1.20$$

IV. To calculate the "standard deviation" of these values, first compute the "variance" according to the following formula.

In this example:

$$\begin{aligned} (V) &= \frac{1}{N-1} \times \left[\text{Sum of Column B} - \frac{(\text{Sum of Column A})^2}{N} \right] \\ &= \frac{1}{5-1} \frac{[8.12 - (6.0 \times 6.0)]}{5} \\ &= \frac{1}{4} [8.12 - 7.2] \\ &= \frac{.92}{4} \\ V &= .23 \end{aligned}$$

V. Finally, the standard deviation (SD) is the square root of the variance.

In this example:

$$\begin{aligned} \text{SD} &= \sqrt{V} \\ &= \sqrt{.23} \\ \text{SD} &= 0.48 \end{aligned}$$

The arithmetic mean is entered in column 5 on the form, and the standard deviation is entered in column 6 on the form.

BILLING CODE 6550-00-01

NW88-0032434

03114314

IN THE AIR ARMS November 1992

§ 783.77 Reporting secondary processing and importation of asbestos mixtures.

The following EPA Form 7710-37, Reporting Secondary Processing and Importation of Asbestos Mixtures, will be completed and submitted to EPA as required in §§ 783.65 and 783.71. Information must be reported on this form to the extent that it is in the possession of the respondent. Importers must report imported products only if the imported product is listed on this form.

(a) EPA Form 7710-37 (8-80)

BILLING CODE 6540-60-M

03114315

NW88-0032435

November 1992

STEWART

U.S. ENVIRONMENTAL PROTECTION AGENCY REPORTING SECONDARY PROCESSING AND IMPORTATION OF ASBESTOS MIXTURES					
PART I - COMPANY INFORMATION					
COMPANY NAME			FOR EPA USE ONLY		
ADDRESS (Street, City, State & ZIP Code)			TECHNICAL CONTACT		TELEPHONE NO.
			IMPORTER ☐ PRINCIPAL ☐ AGENT		
PART II - SECONDARY PROCESSOR END PRODUCT(S)					
From the list in Section E, enter the asbestos end product produced. Opposite each product, list the asbestos mixture that you process, and the quantity of each mixture that you consumed in 1981.					
END PRODUCT(S)		ASBESTOS MIXTURE(S)		QUANTITY OF ASBESTOS MIXTURE CONSUMED	
CODE	GENERIC NAME	CODE	GENERIC NAME	QUANTITY	UNIT OF MEASURE
PART III - IMPORTERS OF ASBESTOS MIXTURE(S) OR ARTICLE(S) CONTAINING ASBESTOS COMPONENTS					
List the asbestos mixture(s) or article(s) that you import and the quantity of each item that you imported in 1981. Opposite each item, enter a description of the asbestos component in the mixture or article.					
ASBESTOS MIXTURE(S) OR ARTICLE(S)		QUANTITY OF ASBESTOS MIXTURE(S) OR ARTICLE(S) IMPORTED		DESCRIPTION OF ASBESTOS COMPONENT(S) IN ARTICLE	
CODE	GENERIC NAME	QUANTITY	UNIT OF MEASURE		
CERTIFICATION FOR CLAIMS OF CONFIDENTIAL BUSINESS INFORMATION					
An authorized company official may claim any information reported on this form as confidential business information. To do this, the confidential information must be clearly circled with a red marker. In addition, an authorized company official must sign below to certify the truth and accuracy of the following four statements, which apply to all information that is claimed.					
1. My company has taken measures to protect the confidentiality of the information, and it will continue to take these measures.					
2. The information is not, and has not been, reasonably obtainable by other persons (other than governmental bodies) by using legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding) without my company's consent.					
3. The information is not publicly available elsewhere.					
4. Disclosure of the information claimed as confidential would cause substantial harm to my company's competitive position.					
SIGNATURE OF AUTHORIZED OFFICIAL				DATE	

EPA Form 7710-37 (10-81)

03114316

REPORTING SECONDARY PROCESSING AND IMPORTATION OF ASBESTOS MIXTURES

INSTRUCTIONS

This form is to be completed by persons who, in 1980, were secondary processors of asbestos or importers of asbestos mixtures or articles that contain asbestos components. See "Reporting Commercial and Industrial Uses of Asbestos", 40 CFR Part 763, Subpart D, for a full description of the reporting requirement and reporting schedule.

If additional space is needed, you should use additional copies of this form.

WHO MUST COMPLETE EPA FORM 7710-37

1. Secondary processors of asbestos must complete Part I and II of the form. Each plant site or manufacturing facility must be reported separately. If you process bulk asbestos fiber to make any of your products at this plant site, then you are a PRIMARY PROCESSOR and you should report this plant site on EPA Form 7710-36.
2. Importers of asbestos mixtures or articles containing asbestos components must complete Part I and II of the form. If you import bulk asbestos fiber, then you should report all importation activities on EPA Form 7710-36.
3. Those who are both secondary processors and importers must complete Parts I, II and III of the form.

DEFINITIONS

1. Asbestos Mixture—means a mixture which contains bulk asbestos or another asbestos. Section 2 below lists typical terms for asbestos mixtures.
2. Asbestos Component—means any asbestos mixture, including any finished product containing an asbestos mixture, which is incorporated into an article. Section 1 below lists typical terms for products made from asbestos mixtures and components. Some examples of asbestos components are: asbestos paper in a hair dryer, asbestos-reinforced plastic cabinet of a television, asbestos matting that is part of a particular type of garment.
3. Secondary Processor of Asbestos—means a person who processes an asbestos mixture.
4. Importer of Asbestos Mixtures or Articles Containing Asbestos Components—means a person who imports merchandise that contains asbestos into the customs territory of the United States. Where there are two or more "importers" for the same shipment, the Principal rather than the Agent should report if possible.

PART I COMPANY INFORMATION

Enter the name, address, and phone number of your company. Enter the name of the principal technical contact who is either responsible for the completion of this form, or has sufficient knowledge of its content to respond to questions posed by EPA. If you are reporting as an importer, check the appropriate box to indicate that you are either the Principal Importer or the Agent for the Principal.

PART II SECONDARY PROCESSOR END PRODUCTS

End Products:—Locate in Section 1 the name of the product subcategory that most specifically describes your end product. In this column, enter the code number for the end product you made and write in the generic name for the product. If you are reporting a product that is not listed, enter the code for "other" that is listed under the most specific general category of products and write in the generic name. Report each end product on separate lines. For example, if you make appliances and are reporting toasters, enter "114" and "toaster".

Asbestos Mixture:—For each end product, locate in Section 2 the name of the asbestos mixture that most specifically describes the asbestos mixture that you incorporate into the end product. In this column, enter the code number for the asbestos mixture and write in the generic name. If you incorporate more than one asbestos mixture into a single end product, then use as many lines as necessary to report all asbestos mixtures in the end product. For example, if you incorporate asbestos millboard into your toaster, your entries would be as follows:

End Product	Asbestos Mixture
114 toaster	00 millboard

Quantity of Asbestos Mixture Consumed:—Opposite each asbestos mixture that is listed, enter the quantity of each mixture that you consumed in 1980. Specify the quantity according to the unit of measure listed in Section 2. If the unit of measure is not listed, report the quantity in short tons. If your records do not permit you to list the quantities consumed for separate end products, then report the total amount of each type of asbestos mixture and enter "T" (for total) next to the figure.

PART III IMPORTERS OF ASBESTOS MIXTURE(S) OR ARTICLE(S) CONTAINING AN ASBESTOS COMPONENT

Asbestos Mixture or Article:—For each type of imported product, locate in either Section 1 or Section 2 the name that most specifically describes the product you import. Enter the code number and generic name for the imported product.

Quantity of Asbestos Mixture(s) or Article(s) Imported:—For each product listed, record the total annual quantity imported in 1980. Specify the quantity according to the unit of measure listed in Section 2, if possible, or according to the unit of measure as reported to the U.S. Customs Service upon entry of the merchandise into the United States.

Description of Asbestos Components in Article:—List all asbestos components in the imported article by entering the name of the asbestos component opposite the name of the article. If the reported product is an asbestos mixture listed in Section 2, then you should not complete this description.

03114317

NW88-0032437

SECTION 1 - TYPICAL TERMS FOR PRODUCTS MADE OF ASBESTOS MIXTURES

AUTOMOTIVE AND FRICTION PRODUCTS

- 101 Drum brake lining light-medium vehicle
- 102 Disc brake pads light-medium vehicle
- 103 Disc brake pads heavy vehicle
- 104 Brake block (heavy equipment)
- 105 Clutch linings (all)
- 106 Automatic transmission friction components
- 107 Friction materials (industrial and commercial)
- 108 Custom automotive bodyliner
- 109 Transmissions
- 110 Mufflers
- 111 Rubberizer tap mouldings
- 112 Rubberizer sockets
- 113 Other (specify generic name)

APPLIANCES

- 114 Appliances industrial and consumer (specify generic name)

CONSTRUCTION PRODUCTS

- 115 Batten and furnace baffles
- 116 Duct and building panels
- 117 A/C sheet
- 118 Flanges or sandboxes
- 119 Heads and vents
- 120 Portable construction building
- 121 Roofing, saturated
- 122 Roof shingles
- 123 Wallboard
- 124 Wall roofing sheets
- 125 Other (specify generic name)

CLOTHING

- 126 Aprons
- 127 Boots
- 128 Goggles and masks
- 129 Hats and headsets
- 130 Overcoats
- 131 Suits
- 132 Other (specify generic name)

FLOOR COVERINGS

- 133 Vinyl asbestos floor tile
- 134 Asbestos-felt-backed sheet vinyl flooring

ELECTRICAL PRODUCTS AND COMPONENTS

- 135 Cable insulation
- 136 Electronic motor components
- 137 Electrical resistance components
- 138 Electrical switchboards
- 139 Electrical switch supports
- 140 Electrical wire insulation
- 141 Motor structure
- 142 Other (specify generic name)

FIRE AND HEAT SHIELDING EQUIPMENT AND COMPONENTS

- 143 Arc defusers
- 144 Fire doors
- 145 Fireproof absorbent paper
- 146 Heat shields
- 147 Motion metal handling equipment
- 148 Oven and stove insulation
- 149 Pipe wrap
- 150 Slings, lifting, vessel and seal
- 151 Steam pipe wraps
- 152 Shields
- 153 Thermal insulation
- 154 Other (specify generic name)

GASKETS

- 155 Sheet gasketing, rubber encapsulated baster asbestos
- 156 Sheet gasketing, rubber encapsulated compressed
- 157 Compressed sheet gasketing (other)
- 158 Metal reinforced gaskets
- 159 Automotive gaskets
- 160 Other (specify generic name)

MARINE EQUIPMENT AND SUPPLIES

- 161 Canoes, marine
- 162 Liners, pond or canal
- 163 Marine bulkheads
- 164 Other (specify generic name)

PAINTS, COATINGS, SEALANTS, AND COMPOUNDS

- 165 Asphaltic compounds
- 166 Automotive/truck body coatings
- 167 Buffing and polishing compounds
- 168 Caulking and patching compounds
- 169 Drilling fluid
- 170 Finishing compounds
- 171 Furnace cement
- 172 Glazing Compounds
- 173 Plaster and stucco
- 174 Pumps, valves, flanges, and tank coating compounds
- 175 Roof coatings
- 176 Textured paints
- 177 Tile cement
- 178 Other (specify generic name)

TEXTILE AND FELT PRODUCTS

- (other than clothing)
- 179 Aluminum cloth
- 180 Rope or twine
- 181 Yarn, top, or roving
- 182 Wools
- 183 Bags
- 184 Baling
- 185 Blankets
- 186 Carpet padding
- 187 Commercial/industrial driver suits
- 188 Crepepaper
- 189 Dry cloths
- 190 Fire hoses
- 191 Insulating board pads and insulation
- 192 Marbles, lamp or analysis holder
- 193 Packing and padding components
- 194 Pans and organ felt
- 195 Rugs
- 196 Tape
- 197 Thermal curtains
- 198 Umbrellas
- 199 Other (specify generic name)

MISCELLANEOUS PRODUCTS

- 200 Aerial descent flares
- 201 Acoustical products
- 202 Antimicrobial wadding
- 203 Asbestos-reinforced plastic products
- 204 Ash trays
- 205 Baking sheets
- 206 Blanketboards
- 207 Condensate
- 208 Chemical tanks and vessels
- 209 Filters
- 210 Groutings
- 211 Gun grips
- 212 Jewelry making equipment
- 213 Keros
- 214 Lamp sockets
- 215 Light bulbs (all types)
- 216 Linings for vaults, sales hummers, and filing cabinets
- 217 Photographic records
- 218 Pottery clay
- 219 Working rod coatings
- 220 Other (specify generic name)

SECTION 2 - TYPICAL TERMS FOR ASBESTOS MIXTURES

PAPERS, FELTS, OR RELATED PRODUCTS

- 01 commercial paper
- 02 millboard
- 03 millboard
- 04 pipewrap
- 05 boiler-aid gasketing paper
- 06 high-grain electrical paper
- 07 unsaturated roofing felt
- 08 saturated roofing felt
- 09 flooring felt
- 10 corrugated paper
- 11 specialty paper (specify)

FLOOR COVERINGS

- 12 vinyl-asbestos floor tile
- 13 asbestos-felt-backed vinyl flooring

ASBESTOS-CEMENT PRODUCTS

- 14 A/C pipe and fittings
- 15 A/C sheet, flat
- 16 A/C sheet, corrugated
- 17 A/C shingles

- short tons
- short tons
- short tons
- short tons
- short tons
- short tons
- short tons
- short tons
- short tons
- short tons
- short tons

- square yards
- square yards
- short tons
- 100 square feet
- 100 square feet
- squares

FRICTION MATERIALS

- 18 drum brake lining (light-medium vehicle)
- 19 disc brake pads (light-medium vehicle)
- 20 disc brake pads (heavy equipment)
- 21 brake block (heavy equipment)
- 22 clutch linings (all)
- 23 automatic transmission friction components
- 24 friction materials (industrial and commercial)

TEXTILES

- 25 cloth
- 26 thread, yarn, top, roving, cord, rope or twine

OTHER PRODUCTS

- 27 sheet asbestos (other than boiler-aid)
- 28 packing
- 29 paints and surface coatings
- 30 asbestos and asbestos
- 31 asbestos-reinforced plastics
- 32 insulation materials not elsewhere classified (N.E.C.)
- 33 mixed or recycled asbestos floor
- 34 other (N.E.C.)

- pounds
- pounds
- pounds
- pounds
- pounds
- pounds
- pounds

- yards
- yards

- square yards
- pounds
- pounds
- pounds
- pounds
- short tons
- short tons

BILLING CODE 6550-60-C

03114318