

as the dry-bag collector. If an EPA Enforcement Officer sees a vapor from the stack where a wet collector is used, the source best be able to prove there is no asbestos being discharged. In other words, it can be inferred that if a source has wet collectors they may more likely be cited for visible emissions.

While it is apparent that the EPA's emissions standards promote the dry collection of asbestos in bags, many problems have been indicated with these collectors. One of the problems was repeated fires in the collection system. Another member stated that he too had this problem until cigarette smoking was banned in the factory. Since discontinuing smoking in the factory, he claims they have not had more than one or two fires in the last 25 years. Another member said that may be, but they have had a No Smoking rule for many years and they still have fires. This party blames the fires on the incentive program where the workers receive a bonus for exceeding certain work standards. This promotes the taking of heavier cuts with grinding wheels and creates sparks which apparently promote the fires in the system. The operation that has not had any fires for the past 25 years does not have an incentive system and does not permit smoking in the work place. Where the wet collectors are now in use, apparently the EPA is permitting their use as complying with the requirements.

At this point, the disposal of the materials picked up by the collectors was brought up. One member sent the dust to a pelletizing machine. In this process they add 5%-10% cement to the pelletizer. A volume reduction in the order of 3 to 1 was developed. The pellets are taken by truck and dumped as land fill. While the pellets could be broken down into a powder, if they receive reasonable handling they can be readily moved from the pelletizing machine to the land fill operation. It is this member's intention to install a vacuum system from the collecting areas to go to a central pelletizing machine. One member described his handling of dust from (1) a central collector, to (2) a screw conveyor, to (3) a truck, and to (4) the land fill. The workers in this case use respirators.

The pelletizing operation not only reduces the transportation cost by three times but eliminates the need for a watering truck and an individual to wet down the land fill. However, the costs of this pelletizing equipment are substantial. A manufacturer of pelletizing equipment is Ferro Tech Inc., 1231 Banksville Road, Pittsburgh, Pa. 15216.

Several members mentioned that in dealing with the EPA Regional Offices they were having difficulties deciding what was a "new source" and what was an "existing source". Also, where one manufacturer adds one machine to an existing collection system he may not be in compliance without getting a Waiver of Compliance. Apparently the EPA will not give a Waiver of Compliance that will take more than 12 months to complete. An applicant must give the steps to be taken and the schedule to be met. When each date arrives, the applicant must advise EPA concerning completion of that stage of the schedule.

One member felt that we should review the EPA source report form to get a better understanding of what they were calling for. Page one of the report would be used for each factory. As there would most likely be several points of emission, page 2 would be completed for each stack or collector that emits asbestos.

If a manufacturer wished to make an addition or modification in his plant with equipment that might put asbestos into the atmosphere, he must file with the EPA. On page 1 of the report he would cross off the words "Source Report" and type in either "Application to Construct a New Source", or "Application to Modify Existing Source". In reviewing page 2 of the report under "Process Description", some questions came up as to how to complete this section. One member who had worked on this report with the EPA said you should enter here the type of