

machinery used without quantifying. Another member indicated that the EPA insisted that he list the type of equipment and the numbers of each piece of equipment. If the EPA specifically said to list the numbers and types of equipment in this section it was suggested that they would have said so on page 2 of the report. The question of putting down the numbers and types of equipment could become very cumbersome where a manufacturer wished to move a grinding machine from a location with one collector to another location where it would be hooked into another collector. The member who filed with the EPA worked on reports in 2 different jurisdictions: New York and Tennessee. He indicated that at neither location did he enter the number of pieces of equipment on this form. (Since the meeting he called to advise that the application filed in Tennessee without quantities was accepted by the EPA. His application in New York State had not been either accepted or rejected as of June 4, 1973.) It would appear that Regional Offices are not in agreement as regards quantification of the equipment under the "Process Description."

The question came up concerning interpretation of question 3, the "Amount of Pollutant." In many factories a set of dry mix brake blocks could exit into a collection system at the mixer, at the briquette press, at the cut-off wheels, at grinding, at drilling, and at inspection and boxing. The problem is that this is the same original asbestos which entered the process and might be counted 6-8 times. So, in effect, a factory taking in one million pounds of asbestos might list one million pounds of asbestos going into 8 different collection systems. This, in turn, would make it appear that eight million pounds of asbestos is going into the operation. From the wording of the form, it would appear that this is exactly what the EPA wants. However, another member was told that this is not what the EPA wants. He suggests that if a factory takes in one million pounds of asbestos into the process that it should not report in total more than one million pounds of asbestos. If he had 10 different emission points, he would divide the one million pounds of asbestos by 10 to give the "amount of pollutant." Again, their apparently has been a difference in interpretation from different Regional Offices of the EPA.

On page 3 of the report, under "Waiver of Compliance," it was stated that Sections 2a and 2b did not have to be completed unless EPA specifically requests this information.

INSTITUTE SEMINAR ON SAFETY AND HEALTH

At the February 16, 1973 meeting, suggestions were made that the Institute consider the sponsoring of a seminar for members associated with plant operations. The Institute indicated it would be willing to sponsor such a seminar if sufficient interest developed.

A question was raised as to whether this seminar would apply only to asbestos. The Secretary indicated that such a seminar would apply to any field of interest but it should be related to problems that can be tied into State and Federal regulations. Among the topics suggested for a seminar were the following:

- Air sampling and asbestos concentration determination.
- The pulmonary function test and X-Ray.
- Possible extension to include noise and heat stress.
- Cooperation between management and workers in meeting the regulations.
- Asbestos bag opening machinery.