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PLAINTIFF'S EXHIBIT

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American Petroleum Institute

Report of Meeting with EPA

H. D. Millay

May 4, 1983

Durham, North Carolina

1. Background

In February 1983 EPA-OAQPS contacted API to request an informal meeting with industry representatives on the subject of asbestos. EPA explained that the 1973 National Emissions Standard for Hazarous air pollutants on asbestos was to undergo a routine 5-year review. The Agency recognized that asbestos insulation in refineries, chemical plants and similar operations may present unusual situations and they wanted to learn more of these applications and special circumstances associated with them.

Accordingly, the Emission Sources Issues Group, at its March 14, 1983 meeting, approved the proposal for a small API delegation to meet with EPA. The meeting occurred on May 4, 1983.

The list of attendees is attached.

2. Discussion

Following breif introductory remarks by G. Wood, Chief of the Stationary Source Analysis Section of the Industrial Studies Branch, M. Laney of Research Triangle I nstitute presented the background, status and approach to EPA's review of the asbestos NESHAPS. An outline of his remarks and a summary of the key points are attached.

During the course of his comments, the attached chart of regulatory alternatives being considered was distributed along with the description of "model plants" to be used in the analysis of refineries and chemical plants, also attached. These items will be the basis of chapters 3-6 of the Background Information Document. As usual, API will have an opportunity to review and comment on these chapters before the BID is prepared for presentation to the National Air Pollution Control Techniques Advisory Committee.

In the discussion following the RTP presentation, the API representatives provided detailed information and examples pertinent to asbestos in refineries. In addition, suggestions were offered to make the standards more realistic and workable. Among the points stressed were:

a. Difficulty of removing asbestos from high temperature lines and inaccessible lines.

b. Problems associated with enclosing some pipes and insulated devices to remove asbestos.

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