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 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 emit 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.