

NET

62811/986
/ATTN GAIL OLSON,
62811/985
/ATTN FRANK DUFFY,
62811/984
/ATTN JOHN HUMMELBERGER,
62811/982
/ATTN REX BEAVERS.

JANUARY 23, 1986.

John McQuilley

*EPA
Ban
H/C Pipe*

TO: GAIL OLSON - EASTERN REGION
FRANK DUFFY - SOUTHWEST REGION
JOHN HUMMELBERGER - PACIFIC REGION
REX BEAVERS - MOUNTAIN REGION

PLAINTIFF'S EXHIBIT

CT-222

FR: LLOYD AMBLER - VALLEY FORGE

RE: EPA PROPOSED BAN ON ASBESTOS PRODUCTS

AS YOU MAY BE AWARE, THE U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) HAS ANNOUNCED ANOTHER PROPOSED BAN ON CERTAIN ASBESTOS-CONTAINING PRODUCTS, INCLUDING A/C PIPE, NOT NECESSARILY BECAUSE THEY POSE A HEALTH HAZARD, BUT AS AN INITIAL STEP IN AN EFFORT TO LIMIT USE OF ASBESTOS FIBERS IN THE U.S. THIS IS ONLY A PROPOSAL WHICH WILL BE PUBLISHED IN THE FEDERAL REGISTER WITHIN THE NEXT FEW DAYS. AT THAT TIME INTERESTED PARTIES WILL HAVE 30 DAYS TO COMMENT. ONCE IT HAS BEEN PUBLISHED IN THE REGISTER WE WILL ISSUE AN APPROPRIATE RESPONSE AS, IN OUR OPINION, EPA'S THINKING IS TOTALLY UNJUSTIFIED AND WE ARE STRONGLY OPPOSING THIS EFFORT.

ALL INQUIRIES OR CONTACTS FROM THE NEWS MEDIA OR ANY OTHER PUBLIC ENTITY RELATIVE TO THIS MATTER, MUST BY COMPANY POLICY, BE REFERRED TO DOTTIE WACKERMAN, VALLEY FORGE OFFICE, EXTENSION 7000.

BASED UPON CURRENT PRACTICES, WE BELIEVE IT IS SAFE TO MANUFACTURE AND USE A/C PIPE. IN FACT, MANY AGENCIES, INCLUDING THE GOVERNMENT, FOR MANY YEARS HAVE BEEN STUDYING THE HEALTH EFFECTS ASSOCIATED WITH THE USE OF A/C PIPE AND THERE IS NO EVIDENCE TO CONCLUDE THAT THIS PRODUCT POSSES A HAZARD TO PUBLIC HEALTH.

FOR OVER A DECADE, CERTAINTEED AND THE A/C PIPE INDUSTRY HAVE SHARED EPA'S INTERESTS THAT COMMERCIAL AND INDUSTRIAL USE OF ASBESTOS AND A/C PIPE BE AS SAFE AS SCIENTIFICALLY AND ECONOMICALLY FEASIBLE. THE INDUSTRY HAS ACTED RESPONSIBLY. CERTAINTEED AND OTHER A/C PIPE MANUFACTURERS NOT ONLY HAVE

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COMPLIED WITH VARIOUS FEDERAL AND STATE LAWS REGULATING THE USE OF ASBESTOS, BUT HAVE BETTERED THEM.

TODAY, AS YOU KNOW, THE MANUFACTURE OF A/C PIPE IS VIRTUALLY A CLOSED SYSTEM: ASBESTOS FIBER HANDLING AND PIPE MACHINING ARE AUTOMATED; PROCESS WATER AND SOLID WASTE ARE RECYCLED; STATE OF THE ART FILTRATION SYSTEMS ELIMINATE 99.9% IN AIR DISCHARGES TO THE ENVIRONMENT.

ALSO, DETAILED WORK PRACTICES HAVE BEEN MADE AVAILABLE TO CONTRACTORS AND INSTALLERS OF A/C PIPE. THESE PRESENT PROVEN METHODS OF CUTTING, BEVELING AND TAPPING PIPE TO INSURE A SAFE WORK ENVIRONMENT.

EPA'S CURRENT THINKING CLEARLY IS NOT BASED ON SOUND SCIENTIFIC JUDGMENT. YOU CAN BE ASSURED THAT WE ARE WORKING DILIGENTLY TO FIGHT THIS ATTEMPT TO BAN A/C PIPE AND AVOID THE UNNECESSARY LOSS OF JOBS TO CERTAINTIED EMPLOYEES WHOSE DEDICATION AND LOYALTY IS VALUED BY THE COMPANY.

AS STATED ABOVE, PLEASE DIRECT ALL INQUIRIES OR CONTACTS FROM THE NEWS MEDIA OR ANY OTHER PUBLIC ENTITY RELATIVE TO THIS MATTER, DIRECTLY TO DOTTIE WACKERMAN.

WHEN QUESTIONED BY DISTRIBUTORS, CONTRACTORS, ENGINEERS, OR MUNICIPAL OFFICIALS, PLEASE MAKE CERTAIN THAT THEY FULLY AND COMPLETELY UNDERSTAND OUR POSITION AS STATED

ABOVE. IF ANY OF YOU HAVE ANY QUESTIONS OR CONCERNS REGARDING THIS TWX, PLEASE CALL ME IMMEDIATELY.

LA/CMB

CC: F. TIMPE
J. DOUGHERTY
D. WACKERMAN
J. MCGINLEY ✓
R. GRAY

MMMM

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CertainTeed Corporation
Pipe and Plastics Group
P.O. Box 860
Valley Forge, PA 19482
(215) 687-5000

CertainTeed 

July 25, 1979

Fellow Workers:

As you are aware, CertainTeed is extremely concerned about any threat to your safety and health. Especially in our asbestos operations, we have tried very hard to implement every precaution to maintain dust levels substantially below those mandated by the Federal Government as being safe. We are pleased that for many years now all our plants have operated in this fashion and we are continuing to reduce our dust counts even below their present levels.

Regardless of all these precautions, there is still one further factor that we can do together to reduce the odds of any of our people developing a problem. It is now pretty well substantiated that smoking increases the potential probability of difficulty among asbestos workers by a factor of 90 to 100. However small a potential risk may be, multiplying it essentially by 100 makes it much more significant.

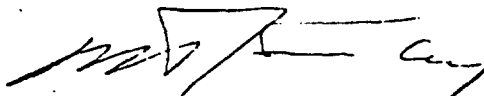
You have probably heard that some of our competitors have absolutely forbidden smoking in their asbestos operations. We do not believe that such an approach is necessary for our people. We do believe that if our people are informed and assisted they will make their own best judgment on their own way of life.

Consequently, we are inaugurating a Company financed professional "Stop Smoking" program for all of our asbestos workers and their immediate families. Jim Heil and Dr. Lawrence Mellon, our Manager of Health and Safety and Medical Director respectively, will be holding meetings with you soon to fully explain the program.

Knowing all the potential dangers of smoking, not only to the lungs, but also to the heart, we strongly recommend to you smokers that you enroll in one of these courses and successfully kick the habit. We will do everything we can to help you; we know it is not easy.

Good luck in your quest for a healthier, happier life.

Best regards,



William A. Krivsky
Senior Vice President

CTD033480

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FROM THE DESK OF . . .

W. A. Krivsky

Copies to:

T. Dougherty
J. Heil
L. Mellon
L. Ambler
J. McGinley

file no smoking

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