



HW88-0032440

East Pgh.

From : Ind./Mfg. Engrg. - 3S20
WIN : 299-4827
Date : October 13, 1982
Subject : EPA Asbestos Reporting Requirements

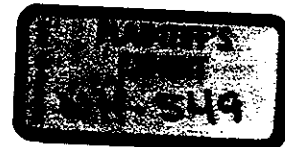
To : Headquarters Industrial Hygiene
R&D Center 401 3X9
Mr. Wayne Bickerstaff

Attached is our Negative Declaration signed by our Plant Manager,
Mr. J. Micka. Also attached is correspondence that is supportive
of our decision that LRA is exempt from reporting.

J. F. Onofrey
IE/ME Department Manager

JFO:IMC

Attachments



Discard Date:

03114350

November 1992

LINE 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200

November 1992

IN THE AIRWAYS

NEGATIVE DECLARATION

HW88-0032441

In accordance with the EPA Toxic Substances Control Act Section 8 (a) "Asbestos Reporting Requirement," we have reviewed our purchases and processes for the year 1981. According to our records and to the best of our knowledge, asbestos was not used at this facility in such a manner as defined as a primary processor, secondary processor or importer.

Signed by: *J. Shick*
Plant/General Manager

Title PLANT MANAGER

Plant: LRA PLANT

Date: OCT. 13, 1982

Send to: Headquarters Industrial Hygiene
R&D Center 401 3X9
1310 Beulah Road
Pittsburgh, PA 15235

03114351



HWBB-0032442

November 1992
ALBTRA
IN THE

From Ind./Mfg. Engrg. - 3S20
With 299-4827
Date October 12, 1982
Subject EPA Asbestos Reporting Requirements

to E. Pgh., 2N32
Mr. J. G. Micka

cc: E. Pgh., 4G13 - Mr. M. A. Roy
cc: E. Pgh., 5-G - Mr. J. G. Leppla
cc: E. Pgh., 5-G - Mr. A. B. Dvorsky
cc: E. Pgh., 2NS - Mr. M. D. Farr
cc: E. Pgh., 4S2 - Mr. H. J. Finney
cc: E. Pgh., 4S6 - Mr. J. S. Zgurich

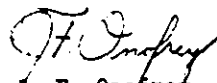
LRA use of asbestos products in 1981 has been investigated, and we have concluded that our usage during this time period was such that we are exempted from reporting as a Primary or Secondary Processor.

Purchasing has reviewed our records for 1981 and concluded that although we purchased asbestos-containing materials for use in our end products, we did not modify the products in our plant (reference attached M. Farr's letter of September 27, 1982). This status was also verified by Messrs. L. Petrich and J. Cavicchio (see attached letters). Purchasing also verified that LRA did not purchase any of the P.D. Spec. material listed on the "Asbestos Tradenames" attachment of Mr. Frank S. Beal's letter (reference attached M. Farr's letter of October 11, 1982).

Plant Services is considered an "end user" of asbestos products since none of the material they purchase is further distributed in our end products.

LRA Operations and Plant Services are therefore both exempted from reporting per page 2 of Mr. Frank S. Beal's letter on the subject (attached).

We therefore recommend that the attached "Negative Declaration" be signed by you and forwarded to Headquarters Industrial Hygiene. We have already verified that this is the correct procedure with Mr. Wayne Bickerstaff, Manager of Industrial Hygiene.


J. F. Onofrey
IE/ME Department Manager

JFO:IMC

Discard Date

03114352

November 1992

UNITED STATES AIR FORCE



NW88-0032443

From East Pittsburgh, 2NS
With 299-4145
Date September 27, 1982
Subject EPA ASBESTOS REPORTING REQUIREMENTS

*cc: J F O'Leary
J. C. Apple
J. J. Malone*

To A. B. Dvorsky - 5G
cc: C. B. Yaskanich - 2N40
F. G. Praysner - 2NS
R. P. Carozza - 2NS

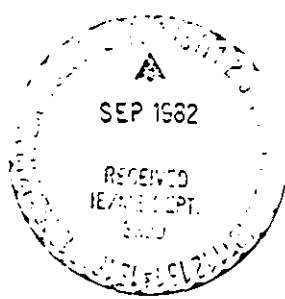
We have reviewed our purchasing records and have verified that during 1981 LRA did not purchase any asbestos for Manufacturing's use.

Specifically:

1. There were no purchases of asbestos stator wedge material as the Kevlar replacement was in use.
2. No asbestos gasket raw material (sheeting) was purchased, although we continue to buy finished asbestos gaskets from Argo Packing.

Based upon the above, I agree with your conclusion that LRA should be exempt from reporting.

[Signature]
Mark D. Farr, Manager
Component Materials Purchasing
MDF/WPC:12039



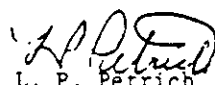


NW88-0032444

From D General
WIN
Date October 5, 1982
Subject EPA Asbestos Reporting Requirements

To A. B. Dvorsky

We have reviewed our records and verified that during 1981 in D-Annex, no asbestos bearing wedges were used in manufacturing. Any asbestos gaskets were received as a finished part and used without modification.


L. P. Petrich
Area Manager, DX

Discard Date

03114354

November 1992

LINE ITEM: AIBR/AMIS



NW88-0032445

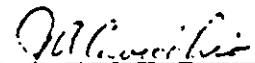
November 1992

To: LRA Mfg., E-General
VWV 4631
Date: October 4, 1982
Subject: EPA Asbestos Reporting Requirements

To: A. B. Dvorsky - S-G
CC: W. E. Ponitz - E-5
K. L. Fulton - E-General

It is my understanding that during 1981, none of the "E" Aisle sections performed any operations involving asbestos.

All asbestos processing was discontinued in 1979.


J. A. Cavicchio
Area Manager

03114355

UNITED AIRB/AMIS



WBB-0032446

November 1992

STRAINS

East Pittsburgh, 2NS
299-4145
October 11, 1982
EPA ASBESTOS REPORTING
REQUIREMENTS

A. B. Dvorsky - 5G

cc: C. B. Yaskanich - 2N40
F. G. Praysner - 2NS
R. P. Carozza - 2NS
J. F. Onofrey - 3S20

As a follow-up to my September 27, 1982 letter, we have reviewed our 1981 purchases specifically checking for any activity against the P.D. Specs. listed on the "asbestos tradenames" attachment.

Our records indicate that there were no purchases during 1981.

Mark D. Farr, Manager
Component Materials Purchasing

MDF/WPC:12114

03114356

November 1992

IN THE AIRWAYS

ASBESTOS TRADENAMES

<u>Name</u>	<u>(W) Material Number</u>
Accopac AS-428	42261AJ
Anchor 317	41521DA
Asbestocite	46316CJ
Aribest C	
Calidrin RG-100	
Calidrin RG-144	
Calidrin RG-600	
Cassiar AK	
Duroid 3700	42261AB
Ebony	46316CA
Garlock 901	42241AD
Garlock 7021	42241AF
Garlock 7021 Rock Hard	42241AG
K6-30	
K68	42251BC
Mannitemp 111	42331CB
Mannitemp 115	42331CC
Mannitemp 117	42331CD
Metaxite	
Monobestos	46316CN
Mysorite	
Nicolet	46316CK
Ohmstone	46316CC
Plastibest 20	
Quinterra 5	42331BC
Quintex 1	42331AJ
Sealsafe Novatex Tape 2132N	41521AD
Service Sheet 60	42241AE
Super Twilstele Joining 200	41521EM
Sylodex	
Transite	46316CE
Valvolite 20	41521DA
Weldgard Commercial 2225	41511BR

WV88-0032447

03114357

Exemption from Reporting

The EPA has exempted certain classes of potential respondents from the requirements of the rule. The exempt class includes:

1. Companies employing 10 or fewer employees.
2. Secondary Processors who apply, assemble, install, erect or consume asbestos products without modifying or fabricating the asbestos product. Example: an appliance manufacturer who installs electric motors containing asbestos components would be exempted.
3. Persons who repair articles, repackage asbestos mixtures without modification or who engage in construction work.
4. Persons who are distributors and do not manufacture, process or import bulk asbestos or asbestos products.
5. Persons who are "end users" of bulk asbestos or asbestos products and do not further distribute such items in commerce. Example: asbestos welding blanket.

Plant's Responsibility

Each plant must survey its facility and determine whether the EPA Asbestos Reporting Requirements apply. This initial survey (three (3) year period from 1979 to 1981 if Primary Processor or just one (1) year, i.e., 1981, if Secondary Processor) should include a review of purchasing invoices for either the three year or one year period, any processes involving bulk asbestos or mixtures and products imported into the United States that contain asbestos. Be aware many asbestos mixtures or products use trade-names such as Transite, Monobestos, etc. Review the attached table on Asbestos Tradenames. If the EPA Asbestos Reporting Requirements apply to your plant, then a decision must be made as to which form (i.e., Primary or Secondary Processor) applies. Then complete either EPA Form 7710-36 or 7710-37 and send the completed, signed form to Headquarters Industrial Hygiene, R&D Center 401 3X9, 1310 Beulah Road, Pittsburgh, PA 15235, by October 11, 1982. Do not send any form directly to the EPA. EPA Form 7710-36 asks for detailed data on products, importation of bulk asbestos, worker exposures, waste and disposal and pollution control equipment. Therefore, allow sufficient time to gather this data and complete the form.

If the EPA Asbestos Reporting Requirement does not apply to your plant, then sign the attached Negative Declaration and return to Headquarters Industrial Hygiene, R&D Center 401 3X9, 1310 Beulah Road, Pittsburgh, PA 15235.

03114358

November 1992

IN THE AIR