

his use of asbestos as a direct result of the aggressive elimination of asbestos by a domestic manufacturer, and thereby gain a price advantage over domestic producers? We do not believe this is a logical way to regulate.

Our concern is heightened by the cost advantages currently enjoyed by foreign producers of gaskets. These cost advantages have been exacerbated by the new OSHA regulations which are applicable only to domestic producers and which will require expensive plant modifications. The EPA proposal threatens to provide even more advantages to the foreign producers. The U.S. government should do all that it can to avoid this result.

For all of the above reasons, we support a regulation based upon product group categories. This regulation should contain specific dates after which asbestos may not be used in products manufactured in or imported into the United States. This restriction need not apply at the customer or installer level, since that use will automatically be eliminated a relatively short time after importation or manufacturing is halted.

What should that timetable be? Our companies are moving to asbestos-free products as rapidly as technology and competition will permit. To use substitutes prematurely -- before they are proven safe and effective -- would amount to