

In January, 1976, a survey was made of the current status of shops where asbestos containing materials are being applied or fabricated. It was noted that four plants allowed some form of taping and these plants were again encouraged to discontinue this practice.

In April, 1976, we responded to a notice in the Federal Register dated March 19, 1976, and changed record keeping retention from three years to twenty years.

The Guideline allows the use of asbestos containing materials under carefully controlled conditions where acceptable substitutes are not available. By definition we did not have acceptable substitutes for Marinite or A Cloth when the Guideline was issued and this office was charged with developing acceptable substitutes for these materials. Therefore, even though our goal has been not to use or work with asbestos in the future, we have had to accept these two materials. In September, 1976, you received a letter recommending the use of Marinite XL, a Johns Manville developed product, which was asbestos free. This product had been tested by the Engineering Department and several of our plants and was found to be fully acceptable as a replacement for asbestos containing Marinite. Thus, the only asbestos containing material which we do not have an acceptable substitute for is A Cloth and the attached Guidelines are changed to reflect this.

Our efforts to eliminate A Cloth have been directed at replacing it with fiberglass. Two major problems must be dealt with in this approach:

1. The attack of the common sodium silicate adhesives on the fiberglass cloth at elevated temperatures.
2. The deterioration in structural strength and increased friability of the calcium silicate insulation due to the replacement of the asbestos binding fibers with nonasbestos fibers.

The first of these two problems have been largely overcome by the use of a proprietary product originally called "Porterlag", now called "Covergard" in certain applications. This product is a fiberglass cloth with a rewettable adhesive already applied to it. The adhesive is an inorganic proprietary substance. This material has been used and is recommended for use in locations not subjected to moisture, elevated temperature, abuse or occasional removal

In locations subject to moisture, elevated temperature, abuse or occasional removal, we consider calcium silicate with A Cloth covering acceptable at this time. In these locations, our candidate for elimination of A Cloth is an insulation system (called soft blankets) consisting of a fiberglass

where do we use this?