FILE NAME: Johns-Manville (JMA)

DATE: 1980-1982

DOC#: JMA220

DOCUMENT DESCRIPTION: J-M Customer Letters - Papers & Millboard, Gaskets, Brakes

Johns-Manville

Internal Correspondence

To: J.F. Reis - Denver, 1-03

Date: March 30, 1982.

From: G.E. Hughes - Mississauga

Copies:

file CPSC Asbestos Paper

Subject: Asbestos Paper and Millboard Customers - U.S.A.

In compliance with your verbal request of March 25, 1982, we enclose a copy of the letter which we sent to U.S. paper users in November, 1981 as well as a list of the few people in the United States that have since purchased asbestos paper and millboard. The products mentioned of course originate from Kingsey Falls, P.Q.

As you will notice in paragraph 4, we did mention to the recipients that a dust supressant was added at Kingsey and the warning label also appeared on the enclosed data sheet for the appropriate product.

As we indicated to you, we have been disappointed with the response to our letter, but keep hoping for an improvement.

Best regards.

GEH

GEH*dmw
Encl.

U.S. PAPER AND MILLBOARD SALES

(1)	Bullough Insulation and Supply Inc., Salt Lake City, UT 84116	Asbestos Rollboard
(2)	Taylored Industries Inc., Pittsburg, PA 15223	Asbestos Paper
(3)	Walco Enterprises, Warren, MI 48089	Asbestos Millboard
(4)	FB Wright Co. of Pittsburgh, Bridgeville, PA 15017	Asbestos Millboard

Johns-Manville Canada Inc.

Asbestos Fibre Division

2021 Cliff Road
Suite 303
Mississauga, Ontario L5A 3N7
(416) 275-1442
Telex: 06-960125

November 9, 1981.

Gentlemen:

We would like to bring to your attention the fact that Johns-Manville in Canada still produce Asbestos Paper, Asbestos 106 Millboard and Asbestos Rollboard.

Data sheets detailing the various thicknesses and sizes are enclosed.

It should be realised that these Canadian produced materials differ slightly from the products formerly produced in the U.S. by Johns-Manville, in that they comprise of 1/16" thick laminations.

The Canadian materials contain a small quantity of a dust supressant which may cause an odour for a brief period at elevated temperatures, but are possessed of the same performance characteristics as the materials with which you are familiar.

Should you require further information or samples, please contact us at this office.

Yours very truly,

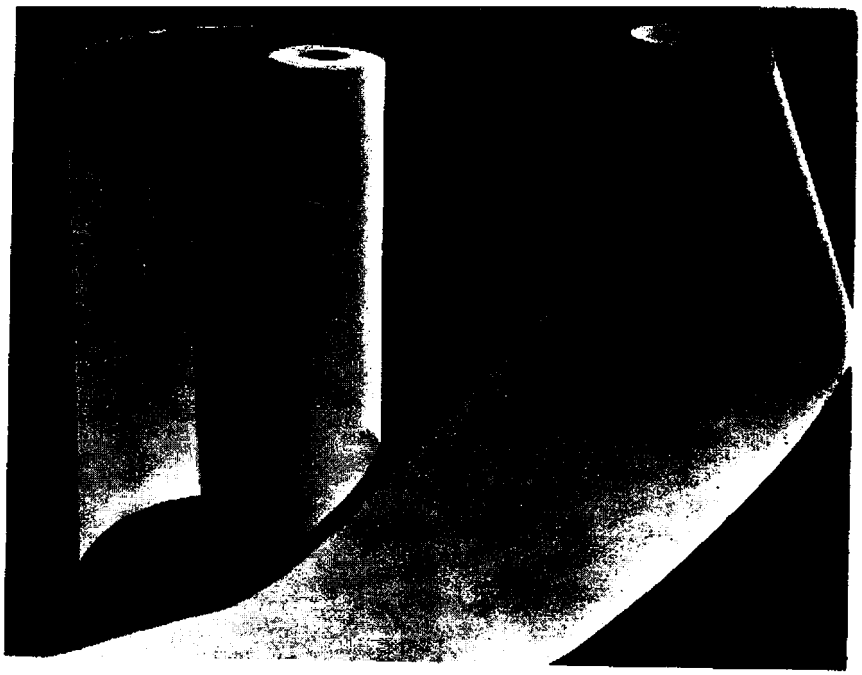
G.E. Hughes,
Sales Manager - Canada.
GEH*dmw
Encl.

Johns-Manville

JM TIP

Type: Asbestos Paper and Rollboard

Thermal Insulation Products



J-M ASBESTOS PAPER AND ROLLBOARD

■ **DESCRIPTION:** A felted sheet material in thicknesses from .006" to .125" composed principally of asbestos fiber and a small percentage of binder. Available in standard rolls of various widths and sizes, also in tape form. Johns-Manville makes a variety of types to fit the needs of home, shop and industry. Used where an insulation of minimum thickness is required to protect against fire, heat or corrosion. Many specialty uses.

■ **AVAILABLE TYPES:**

Commercial Asbestos Paper and Rollboard – A medium length fiber paper with high fiber content (minimum 95%). Satisfactory for most general purpose uses in plant, shop or home. A safety covering for heating ducts. Good for temperatures up to 400F (or to 800F where loss of strength is not critical).

Non-Burn Asbestos Paper — A medium length fiber paper with high fiber content. Suitable for continuous service at 400 F.

Long Fiber Asbestos Paper–Made with high grade long asbestos fiber (minimum fiber content 88%). For use as a thermal insulation; gasketing; base sheet for saturating.

Special Long Fiber Asbestos Paper for Electrolytic Cells–A high quality paper, uniform throughout, for use as diaphragms in electrolytic cells.

Doublex Asbestos Paper – Completely inorganic, will not burn, char or smoke. Has high wet strength. Developed for use as neon sign pattern paper. Also used as liner for foundry funnels and pouring gates. Temperature limit 800F (or 1200F where some embrittlement and loss of strength is not critical).

Asbestos Welding Paper – A 32-lb. paper, 1/16" thick, with low organic content, used to protect adjacent parts from heat, smoke, sparks during welding. Also used to control cooling rate in annealing process.

■ **ADVANTAGES**

Excellent Mechanical Properties

Fast, easy to apply and safe to handle; amply strong for most needs.

Heat Resistant

J-M Asbestos Paper will withstand high temperatures that would damage conventional papers and rollboards.

CAUTION

CONTAINS ASBESTOS FIBERS. AVOID CREATING DUST. BREATHING ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM. SMOKING GREATLY INCREASES THE RISK OF SERIOUS BODILY HARM.

PROD... JM

Johns-Manville

Millboard No. 106

Sheet Insulation Material

Type: Insulating Sheet
Temp. Limit: 800°F

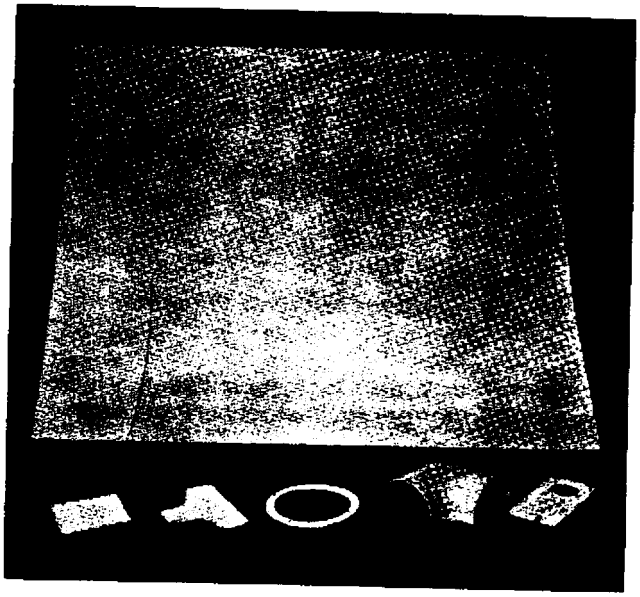
Description:
Johns-Manville Millboard is a dense, rigid, fireproof sheet or board material, light gray in color. Sheets are furnished in thicknesses ranging from 1/16" to 1/2", in standard sizes 36" x 48". Cut pieces can also be supplied.

Uses:
J-M Millboard is recommended for applications which require a sheet or board insulation for protection from fire, heat, acid fumes, etc. It is frequently used as a fire-resistant lining in floors, partitions, ceilings and firedoors and as an insulating barrier in stoves, ovens and heated appliances. Millboard has been found particularly valuable in the steel industry, but can be adapted to scores of industrial applications.

Styles Available:
Number 106 Millboard — general purpose, high utility Millboard suitable for most uses. Will withstand temperatures to 800°F. Meets Federal Specification HH-M-351D Amendment 1. Size 36" x 48".

No. 106 Millboard is treated with a dust suppressant in order to minimize the quantity of dust produced during cutting.

CAUTION:
Contains asbestos fibers. Avoid creating dust. Breathing asbestos dust may cause serious bodily harm. Smoking greatly increases the risk of serious bodily harm.



Silicated Millboard — Millboard can be specially treated to increase surface hardness. Where such sheets are required, the word "Silicated" should appear before the Millboard type. Weight of Silicated Millboard is approximately 5% higher than untreated board.

Special Millboard — for special purposes, Millboard can be tailored to service requirements. Consult your J-M representative for specific applications.

Johns-Manville

Ken-Caryl Ranch
Denver, Colorado 80217
(303) 979-1000

May 27, 1982

Mr. A. J. Kyle
Supervisor, Standards Engineering
Turbomachinery Division
Ingersoll-Rand Company
942 Memorial Parkway
Phillipsburg, N. J. 08865

Dear Mr. Kyle,

Thank you for your April 7, 1982, letter regarding our advertisement in Machine Design magazine.

I must apologize for not answering your letter sooner, but an unusually heavy travel schedule has caused my correspondence to fall behind.

The asbestos-containing products to which you refer in your letter have the asbestos encapsulated by elastomeric binders so that they can be used safely, posing no health problem to the worker. Once installed, there is virtually no possibility of the asbestos fiber becoming airborne from these products.

The health effects of asbestos have been the subject of study for nearly 50 years. These volumes of studies have provided a basis for conclusion as to what constitutes a safe level of exposure to asbestos. Of the numerous non-asbestos products on the market which claim to be replacements for asbestos-containing products, many are composed of relatively newly developed fibrous materials of which little is known about their potential health effects. As an example of this, I have attached a copy of the Material Safety Data Sheet for Garlock's "Blue Guard" gasket sheet. As you will note in the Reactivity Data Section, one of the hazardous decomposition products is acrylonitrile monomer and I have attached an OSHA booklet covering the hazards of acrylonitrile. Realistically, the likelihood of Blue Guard, in normal use, releasing hazardous levels of the noted agent is slim. But as previously pointed out, during normal foreseeable use, asbestos-containing gasketing will not release hazardous levels of asbestos either. I have attached the following information on handling asbestos-containing gasketing materials for your review:

1. "Mechanical Packings and Gasketing Materials Containing Asbestos Fiber" - Johns-Manville

2. "Asbestos Exposure from Gasket Operations" - Naval Regional Medical Center, Bremerton, WA.

3. "All You Need to Know About Gasket Materials" - Johns-Manville.

4. "Disposal of Asbestos-Containing Gaskets and Packings" - Johns-Manville Marketing Bulletin.

Regarding replacing asbestos in gas turbine exhaust expansion joints, I can comment on Johns-Manville "Q" fiber, but not on the Raybestos material, as I'm not familiar with it. Johns-Manville's "Q" fiber is a high temperature (1800° F) insulation material supplied in a bulk or felted sheet form. It could be used in the void between the boot and the metal baffle, but this application would act as an expensive replacement for the existing glass or ceramic insulation, not asbestos. Woven asbestos cloth, coated with various binders, is used in the boot or tadpole section of expansion joints for its flexural strength and heat and abrasion-resistant properties. If "Q" fiber were to be applied in these sections, they would far exceed the temperature requirements of the expansion joint but would lack the needed flexural strength and abrasion resistance.

I hope that this information will be helpful to you. If you have additional questions or would like to have a presentation on asbestos and asbestos-containing products, please feel free to contact us at anytime.

Very truly yours,

Steven Kuhn
Market Manager
Asbestos Fiber Division

/se

bcc: J. F. Reis - 1-03
T. P. Jackson - 3-09
C. W. Miles - 3-09
D. M. Kelleher - 2-13

INGERSOLL-RAND
TURBO MACHINERY

Turbo Machinery Division
Ingersoll-Rand Company
942 Memorial Parkway
Phillipsburg, NJ 08865
201 - 859 - 7000

May 4, 1982

Denis Kelleher
J-M Asbestos Fiber Division
Ken-Caryl Ranch
Denver, Colorado 80217

Subject: Johns-Manville Advertisement
"Machine Design" Magazine

We would appreciate your response to our letter of April 7, 1982, one copy attached.

Thank you for your cooperation.

A. J. Kyle
Supervisor, Standards Engineering
Turbomachinery Division

AJK:ma
5/4/82
Attachment

cc: S. S. Rajan
File

PRODUCED

INGERSOLL-RAND
TURBO MACHINERY

Turbo Machinery Division
Ingersoll-Rand Company
942 Memorial Parkway
Phillipsburg, NJ 08865

April 7, 1982

Denis Kelleher
J-M Asbestos Fiber Division
Ken-Caryl Ranch
Denver, Colorado 80217

Subject: Johns-Manville Advertisement
"Machine Design" Magazine

We refer to Johns-Manville advertisement appearing in March 25, 1982, "Machine Design" magazine.

We are thinking about replacing asbestos in the following components, used in our line of turbomachinery:

Component	Asbestos Replacement Considered
Pipe Flange Gaskets:	
Flat Ring Gaskets	Garlock "Blue-Guard" Non-Asbestos
Spiral Wound Gaskets	Garlock Guardian Style 555 "Pyrofil" non-asbestos
Gas Turbine Exhaust Expansion Joints	Johns-Manville "Q" Fiber. Raybestos Seal Safe Resin Treatment

Please furnish us with:

- Comments on these replacement materials.
- Recommended safe handling, good work practices and proper application, particularly as applied to asbestos flange gaskets and gas turbine exhaust expansion joints.
- More general information on asbestos replacement.

A. J. Kyle
Supervisor, Standards Engineering
Turbomachinery Division

cc: S. S. Rajan
File

INGERSOLL-RAND
TURBO MACHINERY

Turbo Machinery Division
Ingersoll-Rand Company
942 Memorial Parkway
Phillipsburg, NJ 08865

SLK

April 7, 1982

Denis Kelleher
J-M Asbestos Fiber Division
Ken-Caryl Ranch
Denver, Colorado 80217

Subject: Johns-Manville Advertisement
"Machine Design" Magazine

We refer to Johns-Manville advertisement appearing in March 25, 1982, "Machine Design" magazine.

We are thinking about replacing asbestos in the following components, used in our line of turbomachinery:

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Flat Ring Gaskets	Garlock "Blue-Guard" Non-Asbestos
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Gas Turbine Exhaust Expansion Joints	Johns-Manville "Q" Fiber. Raybestos Seal Safe Resin Treatment

Please furnish us with:

- Comments on these replacement materials.
- Recommended safe handling, good work practices and proper application, particularly as applied to asbestos flange gaskets and gas turbine exhaust expansion joints.
- More general information on asbestos replacement.

A. J. Kyle

A. J. Kyle
Supervisor, Standards Engineering
Turbomachinery Division

PRODUCED
JM - 83

cc: S. S. Rajan
File

Johns-Manville
P. O. Box 5108
Ken-Caryl Ranch
Denver, Colorado 80217
(303) 979-1000

F

May 11, 1982

Mr. Daniel A. Parvis
686 Dill Road
Severna Park, MO 21146

Dear Mr. Parvis,

Thank you for your letter of April 4, 1982, to Denis Kelleher about testing for the presence of asbestos in your ceiling tile. First of all, it is our understanding that there were very few ceiling tiles produced that contained asbestos fiber. One reason for this was that the addition of asbestos increased the cost of the tile. This increased cost was difficult to justify in the market because the asbestos contributed very little new benefit to the tile to offset the increased price.

Secondly, you can have your tile tested to determine if it happens to be one that contains asbestos. This testing should be done by a laboratory with the proper equipment and test procedure in order to obtain an accurate analysis. There is a simple chemical testing kit being advertised, which supposedly detects the presence of asbestos-bound iron or magnesium. We have been told that this simple type of test gives numerous "false positive" readings; in other words, it can confirm the presence of asbestos in products that do not contain asbestos. Thus, the way to accurately determine the presence of asbestos is by testing with X-ray diffraction and electron microscopy, which can be done by numerous laboratories in the U.S. The closest one to you is:

Tabershaw Associates
6110 Executive Blvd.
Rockville, MD 20852-3980
Attn: Dr. Keane (301)881-6920

I hope that this information will be helpful to you. If you have additional questions, please feel free to contact us anytime.

Yours very truly,

Steven Kuhn
Market Manager
Asbestos Fiber Division

Bcc: D. M. Kelleher
File/Chrono

/se

Johns-Manville

Ken-Caryl Ranch
Denver, Colorado 80217
(303) 979-1000

F

May 24, 1982

Mr. Jack Poteet
Great Lakes Carbon Corp.
P. O. Box 140
Morganton, N. C. 28655

Dear Mr. Poteet,

Attached is the Friction Material Work Practices Guide that was somehow left out of the packet of information that I sent to you.

As a result of our telephone conversation, I have also attached the work practices booklets for asbestos-cement pipe and asbestos-cement sheet and a white paper on packings and gasketing materials.

If you need additional information or would like someone from Johns-Manville to assist with the asbestos presentation we discussed, please advise.

Very truly yours,

Steven Kuhn
Market Manager
Asbestos Fibre Division

/se
Enclosures

bcc: Hank Shad - Atlanda
D. M. Kelleher

Johns-Manville
Sales Corporation
P. O. BOX 5108
Ken-Caryl Ranch
Denver, Colorado 80217
(303) 978-2000

May 10, 1982

704-439-3221
Mr. Jack R. Poteet
Production Superintendent
Great Lakes Carbon Corporation
P. O. Box 40
Morganton, North Carolina 28655

Dear Mr. Poteet:

Thank you for your letter of 4/2/82 to Denis Kelleher. In answer to your request I have enclosed an assortment of reports that cover the use of asbestos in friction materials and the decomposition products from lining wear. The reports are as follows:

1) "Brake and Clutch Emissions Generated Driving Vehicle Operations" - Jacko, M.G.; DuCharme, R.T.; Somers, J.H.

2) "Asbestos Emissions from Brake Dynamometer Tests" - Anderson, A.E.; Gealer, R.L.; McCune, R.C.; Sprys, J.W.

3) "Brake Lining Decomposition Products" - Lynch, J.R.

4) "Asbestos and Health in the Friction Material Industry" - Asbestos International Association.

5) "Non-Asbestos Friction Materials" - Jacko, M.G.; Brunhofer, C.M.; Aldrich, F.W.

6) "Friction Materials" - Technical Bulletin from Johns-Manville.

7) "Friction Materials Work Practices Guide" - Friction Materials Standards Institute, Inc.

If you have any questions about the enclosed material or would like other specific information please feel free to contact us anytime.

Very truly yours,

Steve Kuhn

Steven Kuhn
Market Manager
Asbestos Fiber Division

Encl.

Bcc: Hank Shad - Atlanta
D. M. Kelleher
File/Chrono

Great Lakes Carbon Corporation
EXECUTIVE OFFICES: 299 PARK AVENUE, NEW YORK, N.Y. 10171

GLC

PLEASE ADDRESS REPLY TO
BOX 40
MORGANTON, NORTH CAROLINA 28655

GRAPHITE PRODUCTS DIVISION

April 2, 1982

Mr. Denis Kelleher
J-M Asbestos Fiber Division
Ken-Caryl Ranch
Denver, Colorado 80217

Dear Mr. Kelleher:

Would you please send me any information you may have on asbestos especially concerning brake shoes.

Thank you.

Sincerely,

Jack Potet

Jack R. Poteet
Production Superintendent

JRP:mec

HOLLINGSWORTH & VOSE COMPANY
Technical and Industrial Papers

HV

East Walpole, Massachusetts 02032
Telephone: (617) 668-0295
Telex: 924470

Dde: CPSC

May 8, 1980

Mr. James Reis
Director-Asbestos Policy
Johns-Manville Corporation
Ken-Caryl Ranch
Denver, Colorado 80217

Dear Jim:

Attached are copies of the letter I received from Dr. Lipshutz and our response to that letter. As you can see, we used Guy's definition because we felt it to be reasonable.

I appreciate your help in the struggle with the EPA and CPSC.

Yours truly,

HOLLINGSWORTH & VOSE COMPANY

Ann R. Wise
Manager of Public Affairs

ARW/js

enclosures

PRODUCT
JM - 8

REGULATORY RESEARCH CORPORATION

Nelson R. Lipshutz PRESIDENT

April 24, 1980

Ms. Ann Wise
Manager of Public Affairs
Hollingsworth & Vose Company
112 Washington Street
East Walpole, Massachusetts 02032

Dear Ms. Wise:

As we discussed over the telephone today, we would appreciate receiving your suggestions as to the elements that should be included in a simple, useful working definition of friable asbestos papers, which would distinguish such papers from those which have a negligible probability of fiber release. We appreciate your desire to respond in writing. But since we need the information as soon as possible, we would greatly appreciate it if you would also call us with your suggestions as soon as you have them together.

Thank you for your help.

Sincerely yours,

Nelson R. Lipshutz

Nelson R. Lipshutz

NRL/sh

PRODUCED
JM - 83

24 Radcliff Road Waban Massachusetts 02168 Telephone (617) 964-6940

May 2, 1980

Dr. Nelson R. Lipshutz
Regulatory Research Corp.
24 Radcliff Road
Waban, MA 02168

Dear Dr. Lipshutz:

In response to your letter of April 24, 1980, we feel that the following is a reasonable definition of "commercial asbestos paper";

> Commercial asbestos paper: a paper consisting of at least 85% chrysotile asbestos fiber plus organic fibers (usually kraft) and a starch binder in thicknesses of .0015" to .0625".

We cannot comment further on such products since we do not manufacture paper of this type.

Yours truly,

HOLLINGSWORTH & VOSE COMPANY

Ann R. Wise
Manager of Public Affairs

ARW/ls

Johns-Manville

Internal Correspondence

To: P. Kotin, M.D.

Date: March 19, 1980

From: E. M. Fenner

Re: CPSC
Asbestos Paper

Copies:

Subject: CONSUMER PRODUCT SAFETY COMMISSION REQUEST
DISCONTINUATION OF ASBESTOS PAPER SALE

Johns-Manville announced on February 25, 1980 (see attached Merchandise Bulletin) the discontinuation of Asbestos Paper and Rollboard. Therefore, it appears we have already complied with part of the CPSC request.

The major portion of Asbestos Paper was sold through distributors and our merchandise people have little knowledge of the end use.

I would anticipate, however, that very little of the material ever became a consumer "do-it-yourself" product.

I doubt very much that Johns-Manville would be willing to comply with CPSC request A-4 or even if it is necessary to do so. I would also anticipate the the information requested in B-1 would be virtually impossible to provide.

E. M. Fenner

EMF:jh
Attach.

Johns-Manville

Merchandise Bulletin

REFRACTORY PRODUCTS DEPARTMENT

No: 80-35-8
Effective: During March, 1980
Cancels: ---------

February 25, 1980

DISCONTINUATION OF ASBESTOS PAPER AND ROLLBOARD
MANVILLE AND WAUKEGAN PLANTS

The Manville paper mill will shut down within approximately 30 days, and all manufacture of Asbestos Paper and Rollboard will cease there. Orders must be placed immediately to be considered for acceptance. The Specialty Papers made only at Manville, including Non-Burn, Long Fiber and Special Long Fiber, will no longer be available after the shut down.

Effective May 30th, Asbestos Paper and Rollboard from Waukegan will also be discontinued. Waukegan will accept orders for these products through April 18th. After that date, delivery will be subject to availability of inventory.

Many of the applications for Asbestos Papers can be filled with non-asbestos Cerafiber and Cerawool Papers. A strong effort should be made to accomplish this conversion, especially in view of the recent 15% price reduction on these products.

Carl P. Weber
Market Manager

TO: 110T 119T
111T 441 (Waukegan & Manville Only)
1141T 5211 (Waukegan & Manville Only)
1142T 5311T-S
116T 5313T-S
117T 731
D, C

cc: G.E. Thompson 2-02

PRODUCED
JM - 83

Johns-Manville

Merchandise Bulletin

INDUSTRIAL PRODUCTS DIVISION / REFRACTORY PRODUCTS DEPARTMENT

No: 80-35-10
Effective: May 1980

Cancels: --------
February 27, 1980

ANNOUNCING --- CERAWOOL MILLBOARD

A New Non-Asbestos Millboard

On or about May 1, Cerawool Millboard will be available from Waukegan. This is a new non-asbestos Millboard made in standard sizes of 42 x 48 inches and in thicknesses of 1/16, 1/8, 3/16, 1/4, 3/8 and 1/2 inches. The product is suitable for temperatures to 1200°F but can be used up to 1600°F where loss of strength is not detrimental.

We shall accept orders for Asbestos Millboard only through March 7. Shortly after that date, Waukegan will permanently discontinue its manufacture to avoid contamination of the new non-asbestos formulation. Orders for Asbestos Millboard received after March 7 will be subject to availability of inventory.

After March 7, Waukegan will accept orders for Cerawool Millboard subject to their future scheduling. As stated above, we would expect availability on or about May 1.

List prices, cartoning schedule and weights of Cerawool Millboard, F.O.B. Waukegan, Illinois, no freight allowed, with terms of payment net 30 days after shipment, are:

THICKNESS, INCHES	LIST PRICE PER SHEET C/L	LTL	NET WEIGHT, LBS./SHEET	NO. OF SHEETS PER CARTON
1/16	$ 5.13	$ 5.75	3.0	21
1/8	10.80	12.10	5.8	12
3/16	15.71	17.60	8.1	8
1/4	18.93	21.20	9.6	6
3/8	27.80	31.14	13.7	4
1/2	38.75	43.40	20.0	3

A table of properties is appended.

Demand expressed for this new, non-asbestos Cerawool Millboard has been great. The moment has arrived --- it is now available! We expect to be deluged with orders.

Carl Weber

Carl P. Weber
Market Manager

PRODUCED
JM - 83

TO: 110T, 111T, 1141T, 1142T, 116T, 117T, 119T, 441 (Waukegan Only), 5211 (Waukegan Only), 5611 (Waukegan Only), 5311T-S, 5313T-S, 731, D,C

JOHNS-MANVILLE

CERAWOOL MILLBOARD

A New Non-Asbestos Millboard

PHYSICAL PROPERTIES

Density	35 pcf
Bending Radius (Wetted)	2 inches
Loss on Ignition	5% at 1200°F

	AS RECEIVED	TEMPERATURE, °F 400	600	850	1000	1200
Modulus of Rupture, psi	275	275	130	135	140	120
Tensile Strength, psi	200	---	65	65	65	65
Compressive Strength, % (Deformation at 500 psi)	45	45	55	55	58	59
Brinell Hardness No.	18	18	18	16	16	16
Abrasion Resistance, % of Loss	3	3	10	10	10	13

PRODUCED
JM - 83

File: CPSC general

Copies: P. Kotin, MD
J. P. Riesenweber
J. E. Daniel

TECHNICAL CENTER

141 LANZA AVENUE • GARFIELD, NEW JERSEY 07026 • AREA CODE 201 • 772-7100

5/11

Frank X. Werber, Vice President
Research and Development

May 3, 1981

Dr. Wm. S. Durrell
Vice President R&D
Jim Walter Corporation
1500 North Dale Mabry
Tampa, FL 33607

Dr. James Ramey
Director of Product Safety
Celanese Corporation
1211 Ave of the Americas
New York, NY 10036

Dr. Stewart K. Kurtz
Vice President, Research
& Engineering
Clairol Appliance Division
2 Blachley Road
Stamford, CT 06902

Mr. James F. Reis ✓
Director, Asbestos Policy
Johns-Manville Corporation
P.O. Box 5108
Denver, CO 80217

Gentlemen:

I have been remiss in not sending you copies of the enclosed letter from Mr. Richard Gross, Executive Director of the Consumer Product Safety Commission, which reached me over three weeks ago. Mr. Gross' letter was a follow up to a previous meeting which I held with Mr. Gross and his assistant, Mr. Andrew Zaikis, on February 17. The purpose of the latter meeting was to explore whether a useful purpose might be served by organizing meetings between top technical people of Industrial Research Institute members and appropriate Consumer Product Safety Commission staff, to deal with industry's efforts in the areas of CPSC concern. Messrs. Gross and Zaikis felt that industry had been generally involved in adversary discussions with CPSC, and technical information exchange was very rare.

With his budget cut 30%, with the future of the Commission under discussion in Congress and without a permanent Chairman, Mr. Gross was anxious for such specific discussions, and proposed to send us the attached letter, detailing the Commission's current concerns.

I look forward to discussing with you, at Scottsdale and over the phone, your reaction to the proposed exchanges of information. In my view, I think a follow-up with CPSC personnel may be fruitful in those areas where industry has a cogent body of facts to present. To my knowledge, this includes asbestos, benzidine congener dyes and plastics flammability. On the other hand, certain of these topics have been discussed in the greatest detail with the CPSC staff, and additional repeat may be a waste of time.

Sincerely,

F. X. Werber

FXW:df

cc: Dr. Theodore L. Heying
Director of Research,
Chemicals Group
Olin Corporation
275 Winchester Ave.
New Haven, CT 06511

Dr. Sherman K. Reed
Vice President
Director, Chemical Technology
F M C Corporation
2000 Market St.
Philadelphia, PA 19103

Dr. Lewis H. Sarett
Sr. Vice President
Science and Technology
Merck & Company, Inc.
Rahway, NJ 07065

U.S. CONSUMER PRODUCT SAFETY COMMISSION

WASHINGTON, D.C. 20207

Frank X. Werber, Vice President
Research and Development
J. P. Stevens and Company, Inc.
Technical Center
141 Lanza Avenue
Garfield, New Jersey 07026

Dear Mr. Werber:

Thank you for taking the time to meet with me and my staff to discuss the nature and purpose of the Industrial Research Institute. The staff of the Consumer Product Safety Commission is very interested in the possibility of working with the Institute to coordinate our efforts in the area of technical research concerning consumer products. Given our shared concern in providing consumers with the safest possible products, I am confident that cooperation between us will prove to be most beneficial to all including, especially, consumers.

As requested at our meeting in February, I am providing you a brief summary of some of our long-term research areas involving consumer products that may be of interest to the Institute members. I would point out that most of these topics involve areas where the Commission staff have a general concern regarding safety and do not necessarily represent areas in which the Commission will be regulating in the future. Since the Commission's mandate is to reduce unreasonable risks of injury associated with consumer products, a substantial amount of research and effort is initially required in some of these areas to determine the exact nature and degree of a perceived risk within a particular consumer product. In the course of such assessments, we have always attempted to work closely with the segments of industry that might be affected and in many cases have been able to promote and assist industry efforts to address the issue on a voluntary basis, thus precluding any need for regulatory action by the Commission. We expect to be working together with industry in the areas that are listed below and would welcome any additional cooperation that may be provided by the Institute or its members.

Some of the major areas of Commission activity for the upcoming year include the following:

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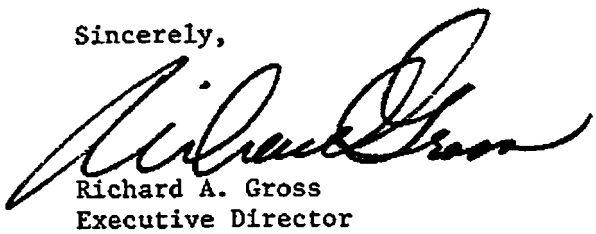
Commission staff members are available to discuss in more detail each of the above areas as well as our existing and planned research efforts. We also are willing and anxious to explore areas of cooperation and coordination in our mutual research efforts. It is my sincere hope that this letter will serve as the first step of a promising and rewarding effort towards increased consumer product safety. I look forward to hearing from you and the Institute in the near future.

Sincerely,



Richard A. Gross
Executive Director

File : CPSC

J.P Stevens & Co., Inc.

Stevens Center

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March 31, 1982

SUBJECT: Meeting with Ms. Nancy Steorts, Chairman, Consumer Product Safety Commission and Associates at Commission's HQs in Washington, March 19, 1982.

FROM: F. X. Werber

Dr. Frank X. Werber, VP Research & Development, J.P. Stevens, Chairman
Dr. Theodore L. Heying, Director of Research, Chemicals Gp. Olin Corp.
Dr. Stewart K. Kurtz, VP, Research & Engineering, Clairol Appliance Div
Mr. James Ramey, Director of Product Safety, Celanese Corporation
Mr. James F. Reis, Director, Asbestos Policy, John-Manville Corp.

Meeting was attended by the first four subcommittee members listed above. Mr. Reis was unable to attend.

From the Consumer Product Safety Commission, besides Ms. Steorts, attendance consisted of Ms. Katherine Cook, Executive Assistant to the Chairman, Dr. Peter Preuss, Director of Health Sciences, and two gentlemen who were assistants to Commissioners Sagoria and Pittle respectively.

In our presentation, members of the subcommittee emphasized two main points:

(1) The Industrial Research Institute through its Federal and Science Technology Committee, seeks to serve as an effective bridge between the industrial research community and agencies of the U.S. government whose work depends heavily on technical information from diverse sources.

(2) The companies and industries represented by the members of the subcommittee have in depth R&D and technical organizations to deal with safety of their products.

Response from Ms. Steorts generally emphasized her strong interest in collaboration with industry. Following are the specific conclusions from the meeting:

(1) Ms. Steorts asked for a one-page summary of the organization and activities dealing with product safety in each of the companies represented on the subcommittee.

(2) Ms. Steorts suggested a series of seminars of R&D and technical people from industry with CPSC staff, each dealing with two, three or four specific issues. The industry people would discuss the technical factors and constraints surrounding their products of interest to the CPSC. The subcommittee agreed that this suggestion has merit, and we plan to discuss further whether and how this could be followed up.

In limited discussions with American Textile Manufacturers Institute staff, it has already become clear to me that each company and industry will have to weigh the potential benefits against the risks in undertaking such meetings.

(3) The subcommittee suggested that a way should be found for the CPSC staff to have access to balanced technical advice from industry as well as academia, at very early stages in their examination of potential hazards. As it now stands, "Chronic Hazard Advisory Panels" are convened only after a threat to consumer safety is suspected, with all the attendant publicity that convening such a group generates. There is a legal problem in trying to bring about panels at an earlier stage, and Mrs. Katherine Cook was asked to examine what the possibilities were. (I know for a fact that others have suggested similar panels, but "sunshine" guidelines impose some serious obstacles to setting up formal boards.)

Members of the subcommittee agreed to consider point 1) quickly and provide the summaries to F. X. Werber for transmittal to the CPSC, if agreeable to their companies. I will discuss with the subcommittee members follow up action on 2).

F. X. Werber

cc: Dr. Theodore L. Heying
Dr. Stewart K. Kurtz
Mr. James Ramey
Mr. James F. Reis
Mr. Lewis H. Sarett
Mr. S. G. Stearns
Mr. E. Steinberg
Mr. Charles F. Larson

FXW3241
tm

Johns-Manville Corporation

Ken-Caryl Ranch
Denver, Colorado 80217
(303) 978-3039

James F. Reis
Director, Asbestos Policy

File CPSC

April 8, 1982

Dr. F. X. Werber
J. P. Stevens & Co., Inc.
P. O. Box 2850
Greenville, SC 29602

Dear Frank:

I have reviewed the minutes of your meeting with Nancy Steorts and am attaching a very brief summary of Johns-Manville's activities dealing specifically with product safety and asbestos as they pertain to CPSC's areas of responsibility.

Again, I apologize for not being able to attend the meeting.

Very truly yours,

James F. Reis

JOHNS-MANVILLE PRODUCT SAFETY ACTIVITIES AND CPSC

Johns-Manville is not considered to be a producer of consumer products. However, because of the concern expressed by the CPSC about risks to the health of the consumer from asbestos or asbestos products used in the manufacture of consumer products, the company has attempted to work with the agency in identifying potentially hazardous situations. Both independently and through participation in industry associations, Johns-Manville has developed and tested work practices that will limit release of respirable asbestos during the fabrication of asbestos products. Where it was not reasonable to assume that these work practices would be followed, product composition has been changed to encapsulate the asbestos in binders or to eliminate the asbestos from the product line. Johns-Manville has a Health, Safety and Environment Department staffed by health professionals and also maintains extensive Research facilities for evaluating all product lines.

File: CPSC

J.P Stevens & Co., Inc.

Stevens Center

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TECHNICAL CENTER

Copies:
J. P. Leinewebe
J. H. Swenson
2/24 B. J. Pigg - Ad/A
RTI?

February 15, 1982

Ms. Nancy Steorts, Chairman
U.S. Consumer Products Safety Commission
Washington, D. C. 20207

Dear Ms. Steorts,

I am writing to you on behalf of the Federal Science and Technology Committee of the Industrial Research Institute. I am chairman of the Subcommittee for Consumer Products and Trade Regulation (i.e., of the Federal Science and Technology Committee).

To capsulate briefly, the Industrial Research Institute is an organization whose aims are to promote the benefits and impact of industrial research in the United States. The organization is over 40 years old, and approximately 300 of the largest corporations in the U.S. (and a few overseas) with private (i.e., nongovernment--finance) research programs comprise the membership. The Federal Science and Technology Committee has approximately 20 subcommittees, which interface with the various branches of the Administration and the Congress in an effort to be of service.

My subcommittee has been loosely in existence for some years, but our contacts with the CPSC have been sporadic. Most recently, I had a meeting with Mr. Richard Gross, the former Executive Director, and his assistant, Mr. Andrew Zakis on February 17, 1981, to explain to him that our membership--which includes companies in the building materials industry, textile industry, all the major chemical companies, oil and electronic industry--would be pleased to meet as a group with members of the commission, to explain our various philosophies of research as related to the safety of products which we manufacture, some of which impact the consumer directly. Mr. Gross expressed great interest in continued contact, and wrote me a letter outlining the then areas of interest of the commission (copy enclosed).

We did not immediately pursue the meetings suggested by Mr. Gross, because of the changes taking place at the time, which in part culminated in your appointment. I felt it was timely to resume contact, since you have had a period of many months to become established, and since perhaps it may be of interest to you to discuss with some of us how we might be of help to you in the work of your Commission. Let me list for you briefly the names and connections of the subcommittee members.

Dr. Stewart K. Kurtz
Vice President, Research
& Engineering
Clairol Appliance Division

Dr. James Ramey
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Celanese Corporation

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Johns-Manville Corporation

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Chemicals Group
Olin Corporation

In addition, membership of IRI almost certainly includes companies in all the industries whose products your staff may deal with on occasion.

It may be of interest to yourself, some of the other Commissioners and to your staff to meet with a number of us at a time convenient to you, for perhaps 2 hours or so, for us further to explain the role of IRI, and how we might be of help. At the same time, we are most anxious to hear your concerns and interests. These will most certainly have a bearing on the programs pursued in our various companies. Accordingly, I plan to call your office in about a week or so, to see when such a meeting may be convenient. Tentatively, I would look to the week of March 8th, if that suits your schedule.

We look forward to meeting with you.

Sincerely,

F. X. Werber
Vice President,
Research and Development

cc: Dr. Stewart K. Kurtz
Dr. James Ramey
Mr. James F. Reis
Dr. Theodore L. Heying
Dr. Lewis H. Sarrett

jlg

FXW2152

P.S. I am asking the office of the Executive Director of the Industrial Research Institute, Mr. Charles Larson, to send you a copy of the most recent annual report of the IRI, which will provide a good rundown of the Institute's activities.

U.S. CONSUMER PRODUCT SAFETY COMMISSION

WASHINGTON, D.C. 20207

Frank X. Werber, Vice President
Research and Development
J. P. Stevens and Company, Inc.
Technical Center
141 Lanza Avenue
Garfield, New Jersey 07026

Dear Mr. Werber:

Thank you for taking the time to meet with me and my staff to discuss the nature and purpose of the Industrial Research Institute. The staff of the Consumer Product Safety Commission is very interested in the possibility of working with the Institute to coordinate our efforts in the area of technical research concerning consumer products. Given our shared concern in providing consumers with the safest possible products, I am confident that cooperation between us will prove to be most beneficial to all including, especially, consumers.

As requested at our meeting in February, I am providing you a brief summary of some of our long-term research areas involving consumer products that may be of interest to the Institute members. I would point out that most of these topics involve areas where the Commission staff have a general concern regarding safety and do not necessarily represent areas in which the Commission will be regulating in the future. Since the Commission's mandate is to reduce unreasonable risks of injury associated with consumer products, a substantial amount of research and effort is initially required in some of these areas to determine the exact nature and degree of a perceived risk within a particular consumer product. In the course of such assessments, we have always attempted to work closely with the segments of industry that might be affected and in many cases have been able to promote and assist industry efforts to address the issue on a voluntary basis, thus precluding any need for regulatory action by the Commission. We expect to be working together with industry in the areas that are listed below and would welcome any additional cooperation that may be provided by the Institute or its members.

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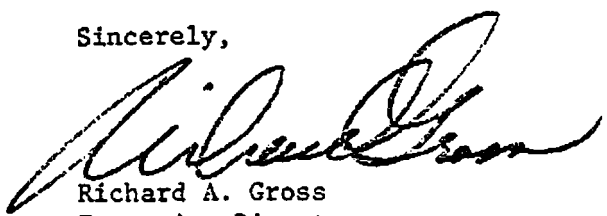

Richard A. Gross
Executive Director

J. P. Stevens & Co., Inc.

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March 11, 1982

Ms. Ann Walker
U.S. Consumer Products
Safety Commission
Washington, D.C. 20207

Dear Ms. Walker:

Confirming our telephone conversation, the members of my Subcommittee of Industrial Research Institute's Federal Science and Technology Committee look forward to meeting with Chairman Steorts, other Commissioners who have been invited, and members of your staff. As discussed, we plan to meet with you at 2:30 at your offices at 1111 18th Street, Washington, D.C.

All the members of the Subcommittee, named in my previous letter of March 2, 1982, will be able to attend. They include Messrs. Heying, Kurtz, Ramey and Reis, besides myself.

As discussed, our plan is:

(1) To present, informally, aspects of R&D and technical work directed towards improved safety of our products in five different industries, represented by members of our Committee.

(2) Discuss other ways in which the Industrial Research Institute and its members may interact effectively with the Consumer Products Safety Commission.

We look forward to seeing you on March 19.

Sincerely,

F. X. Werber

bcc: Mr. Charles F. Larson
Dr. Lewis H. Sarrett
Dr. Theodore L. Heying
Dr. Stewart K. Kurtz
Dr. James Ramey
Mr. James F. Reis

FXW3111