

FILE NAME: Packings and Gaskets (PAG)

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Boelter & Yates, Inc.

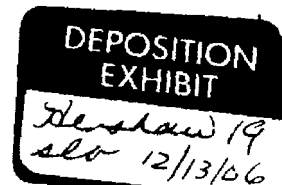
Environmental Engineers & Scientists

March 14, 2003

Ms. Cynthia Weaver
Technical Support
U.S. Dept. of Labor - OSHA - TS
230 S. Dearborn Street
Room 3244
Chicago, IL 60604

RECEIVED MAR 21 2003

Re: Regulatory Opinion
Asbestos Regulations [29CFR1910.26 (G) (vi)]



Dear Ms. Weaver,

In the course of our business we have been asked to look at the application of 29CFR 1910.26 (g)(vi) to gaskets and packings containing more than 1% asbestos and have "Asbestos fibers... modified by a bonding agent, coating, binder or other material..."

I conducted a search of the scientific literature and have conducted a study of gaskets and packings which was published in the November 2002 American Industrial Hygiene Association Journal. My article, a copy of which is attached, also critiques other literature on the subject.

My study correlates well with other competently conducted, published and unpublished studies of gaskets and packings. The range of concentrations on a 8-hour time weighted average (TWA) for the ten tests of five activities documented total fiber release under worst case scenarios as follows:

Activity	Personal	0.035	0.028
Industrial #1 - Flat blade scraping	Personal	0.007	0.005
Industrial #2 - Hand wire brushing	Personal	0.023	0.021
Industrial #3 - Power wire brushing	Personal	0.052	0.038
Industrial #4 - Making gaskets with a ball peen hammer	Personal	0.027	0.024
Industrial #5 - Stem packing removal and replacement	Personal	0.019	0.014
Maritime #6 - Flat blade scraping	Personal	0.004	0.000
Maritime #7 - Hand wire brushing	Personal	0.010	0.008
Maritime #8 - Power wire brushing	Personal	0.028	0.022
Maritime #9 - Making gaskets with a ball peen hammer	Personal	0.010	0.008
Maritime #10 - Stem packing removal and replacement	Personal		

Given these findings, I would appreciate OSHA's opinion as to whether or not gaskets and packings require labeling per 29CFR1910.26 (g)(vi).

Sincerely,

Frederick W. Boelter, CIH, PE

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