PLAINTIFF'S EXHIBIT WH-872
PENGAD-Bayonne,NJ

IN RE: ABRAMS DECEMBER 1.992
03112612

Combustion Turbine Systems Div.

November 27, 1979
Comments on Proposed Federal Rulemaking
Restricting Use of Asbestos

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PRODUCT SAFETY & INTEGRITY

To: Mr. John F. Gormley, Director
Product Safety and Integrity
R&D Center, #601

The Combustion Turbine Systems Division has utilized asbestos materials in four areas of our product line; i.e.:

1. Turbine engine insulation
2. Hot piping insulation
3. Expansion joint fabric component
4. Gaskets for joints in hot pipe assemblies

Some years ago, we successfully implemented a subsitution program and have completely eliminated asbestos from Areas 1 & 2 above. Area 3, the expansion joint fabric is shortly expected to be successfully replaced with a workable substitute material. The remaining item, gaskets, will be the most difficult for which to find a substitute. We use this item installed as a finished product, slipped into a steel flange assembly which, when bolted together, is enclosed, thereby eliminating human exposure.

The essential ingredient for our success has been the commercial availability of usable substitutes. Cost has not been a factor for us. In reviewing the issues highlighted in your letter of November 9, 1979, it is clear that we must address "Essential use" of asbestos; the problem being how to define what is essential.

A good example is our presently unsolved category 4, gaskets for high temperature piping. We use a product called the "flexitallic" gasket which is a combination of metal and asbestos. It is a standard product in industry for this application. We have no immediate substitute available and cannot operate our equipment without the product. We, therefore, consider this an "essential" item.

We endorse the government motives aimed at improving the health and well-being of the population but we are very concerned about the potential here for getting involved in laborious justifications and unnecessary paperwork simply due to unworkable or unclear definitions of essential use of asbestos.

Thank you for the opportunity to comment.

J. Citino, Mgr.
Systems Engrg.
CTSD

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