

DURABLA MANUFACTURING COMPANY

27 INDUSTRIAL BLVD. P.O. BOX 1010, PAOLI, PENNSYLVANIA 19301-0916
TEL. 215 647-6900 • CABLE "ABLADUR" ARDMORE PENN
TELEX 83-1845

February 22, 1983

Westinghouse Electric Corp.
P.O. Box 901
Orrville, Ohio 44667

Attention: Robert Oelschlanger,
Manager, Business Planning

Dear Mr. Oelschlanger:

Reference our telephone conversation of last week when discussing DURABLA® Gasket Material with customers or describing DURABLA® to an OSHA inspector or any other Government Official, the following definition should be used.

The asbestos contained therein has been modified by binders and other fillers so that it is "locked-in" or "encapsulated" during the manufacturing process so that during any reasonable, foreseeable use, handling, storage, disposal, processing or transportation, no air-borne concentrations of asbestos fiber in excess of the exposure limits listed in Part 1910.1001, Subpart Z of the Code of Federal Regulations (Title 29) will be released.

I hope the above is useful and enclose a copy of the referenced Code of Federal Regulations. Also enclosed is a copy of the Material Safety Data Sheet.

Yours very truly,

DURABLA MANUFACTURING COMPANY

Louis R. Thonges
Manager - Sales Administration
Sealing Products Division

LRT/lw
Enclosures

PUMP VALVES & CHECK VALVES - SHEET PACKING & CUT GASKETS

03114047



November 1992

IN RE: ABRAMS

NW88-0032409

November 1992

LINE REPORT: ABRAMS

U.S. Environmental Protection Agency P.O. Box 3670 Rockville, MD 20852							
REPORTING COMMERCIAL AND INDUSTRIAL USES OF ASBESTOS							
Please read the accompanying instruction booklet before completing this form. Note that a separate form must be submitted for each plant site, except that small imports or exports of bulk asbestos may be reported in a consolidated corporate report. The instructions provide further directions. When this form is complete, enclose it in the preaddressed envelope provided. Should you have any questions, please contact the Industry Assistance Office toll-free at (800) 424-8065 or in Washington, D.C. at (202) 554-1404. All persons who are solely secondary processors, importers of asbestos mixtures, or importers of articles containing asbestos components will report in the first phase on EPA Form 7710-37, titled "Secondary Processing and Importation of Asbestos Mixtures." These persons will report on this form, EPA Form 7710-38, only upon receipt of notice to that effect from EPA (see 40 CFR 763, part D1).							
A(1). RESPONDENT IDENTIFICATION							
1. Company name: WESTINGHOUSE ELECTRIC CORPORATION Plant site name: COMBUSTION CONTROL DIVISION Address (number and street): P. O. BOX 901 (1201 NORTH MAIN STREET) City: ORRYVILLE County: WAYNE State: OHIO ZIP code: 44667 2. Principal technical contact person: Name: R. P. OELSCHLAGER Job title: MANAGER SPECIAL PROJECTS Office telephone (area code, number, extension): 216-682-9010 3. If applicable - Record mine identification number: N/A 4. If applicable - Record the name and address of the parent corporation which is responsible for the fiscal management of the reporting site. Name of parent corporation: WESTINGHOUSE ELECTRIC CORPORATION Address (number and street): WESTINGHOUSE BUILDING - GATEWAY CENTER City: PITTSBURGH County: ALLEGHENY State: PENNSYLVANIA ZIP code: 15222 5. Record the total number of years during which the manufacture and/or processing of asbestos has been conducted at the reporting site. 16							
A(2). RESPONDENT ACTIVITY							
6. Identify your activity from the definitions in the instruction booklet and mark (X) the box next to the category below that best describes your activity(ies). Mark (X) next to all activities that you are reporting on this form. You must at least complete the portions of this report that are indicated next to the box you mark, and you must complete other sections if you conduct that activity. For example, if at the same plant and you process bulk asbestos to produce an asbestos mixture and you also process an asbestos mixture that is made at another location, then you as a primary processor must also complete part D as a secondary processor. All persons who are owners, miners, primary processors, or importers of bulk asbestos must report their asbestos activities at all plant sites. Mark (X) your activity(ies) that is reported on this form. ☐ Mine and mill - Complete parts A, B(1), G, H, I, J, K (B(3), if applicable) ☐ Primary processor - Complete parts A, C, G, H, I, J, K (B(3), if applicable) ☐ Importer of bulk asbestos - Complete parts A, B(2) (B(3), if applicable) ☒ Secondary processor - Complete parts A, D, G, H, I, J, K ☐ Importer of asbestos mixtures - Complete parts A and E ☐ Importer of articles containing asbestos components - Complete parts A and F							
A(3). CERTIFICATION FOR CLAIMS OF CONFIDENTIALITY							
You may claim as confidential any information you submit on this form. The instructions provide specific instructions on how to assert claims of confidentiality. For information which you submit in attachments to the form, provide a copy which clearly indicates the information you wish to claim confidential. Space is provided at the end of each line to claim information on that line confidential. For any information on this form you claim as confidential, you must certify that the information is confidential. The signature below will attest to the truth and accuracy of the following statements. All four statements must be true about any information you claim confidential. - My company has taken measures to protect the confidentiality of the information, and it will continue to take these measures. - The information is not, and has not been, reasonably obtainable by other persons (other than governmental bodies) by using legitimate means (other than discovery based on a showing of special need and in a judicial or quasi-judicial proceeding) without my company's consent. - The information is not publicly available. - Disclosure of the information claimed as confidential would cause substantial harm to my company's competitive position. 7. Signature of authorized official: _____ Date: _____							
B(1). PRODUCTION OF BULK ASBESTOS							
QUANTITY OF BULK ASBESTOS MINED OR MILLED							
Error, in short tons, the amount of bulk asbestos you produced (mined or milled) for 1979 through 1981.							
Report in short tons							
Year	Chrysotile	Crocidolite	Amosite	Anthophyllite asbestos	Tremolite asbestos	Actinolite asbestos	Confidential Mark (X)
1979	N/A						
1980	N/A						
1981	N/A						
B(2). IMPORTATION OF BULK ASBESTOS							
QUANTITY OF BULK ASBESTOS IMPORTED							
Error, in short tons, the amount of bulk asbestos you imported for 1979 through 1981.							
Mark (X) one: ☐ This is a corporate confidential report. ☐ This is a plant site report.							
Report in short tons							
Year	Chrysotile	Crocidolite	Amosite	Anthophyllite asbestos	Tremolite asbestos	Actinolite asbestos	Confidential Mark (X)
1979	N/A						
1980	N/A						
1981	N/A						
B(3). EXPORTATION OF BULK ASBESTOS							
QUANTITY OF BULK ASBESTOS EXPORTED							
Error, in short tons, the amount of bulk asbestos you exported for 1979 through 1981.							
Mark (X) one: ☐ This is a corporate confidential report. ☐ This is a plant site report.							
Report in short tons							
Year	Chrysotile	Crocidolite	Amosite	Anthophyllite asbestos	Tremolite asbestos	Actinolite asbestos	Confidential Mark (X)
1979	N/A						
1980	N/A						
1981	N/A						

EPA Form 7710-38 (5-12-82)

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HWBB-0032410

C. PRIMARY PROCESSOR PRODUCTION										
Enter the following information for each type of and product that you shipped from your plant site. Classify year and products according to the list below.										
Code number	One product shipped (Enter one and product per line) (1)	Type of asbestos fiber (Also enter fiber per number type) (2)	Year (3)	Quantity of asbestos consumed (Short tons) (4)	Product shipments				Comments (Short 20)	
					Total annual production (5)		Value shipped (Thousands of dollars) (6)			
					Quantity	Unit of measure	Dollars	Cents		
	N/A	☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other	1979							
		☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other	1980							
		☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other	1981							
		☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other	1979							
		☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other	1980							
		☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other	1981							
		☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other	1979							
		☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other	1980							
		☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other	1981							
(8) Estimate the percentage of the total value shipped from the plant site reported here as primary processor production in 1981: _____ %										

D. SECONDARY PROCESSOR PRODUCTION										
Enter the following information for each type of and product that you shipped from your plant site. Classify year and products and asbestos mixtures consumed according to the lists on this form.										
Code number	One product shipped (Enter one and product per line) (1)	Total annual production (2)		Asbestos mixture consumed and form (Enter one mixture per line) (3)	Purification of asbestos in product (4)	Year (5)	Annual consumption of asbestos mixtures (6)		Comments (Short 20)	
		Quantity	Unit of measure				Quantity	Unit of measure		
		Quantity	Unit of measure				Quantity	Unit of measure		
114	GEYER SENSO	1979	0		HEAT INSULATION AND GASKET SEAL	1979	0			
		1980	0			1980	0			
		1981	330	PIECES	27 DURELA 1/12" SHEET	1981	10.00	50 YDS	0.11	
		1979				1979				
		1980				1980				
		1981				1981				
		1979				1979				
		1980				1980				
		1981				1981				
(8) Estimate the percentage of the total value shipped from the plant site reported here as secondary processor production in 1981: $\frac{\$432 \text{ (DURELA PIECE VALUE)}}{\$423,000 \text{ - FIB. PIECE VALUE}} = 0.035\%$										

E. IMPORTATION OF ASBESTOS MIXTURES										
Enter the following information for each type of asbestos mixture that you imported in 1981. Classify year and products according to the lists in section C or D.										
Code number	Asbestos mixtures (Enter one mixture per line) (1)	Asbestos fiber content of imports (2)		Year (3)	Total annual imports (4)			Comments (Short 20)		
		Type of asbestos	Quantity (Per unit)		Quantity	Unit of measure	Value of imports (U.S. dollars)			
		Type of asbestos	Quantity (Per unit)		Quantity	Unit of measure	Value of imports (U.S. dollars)			
	N/A	☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other		1979						
		☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other		1980						
		☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other		1981						
		☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other		1979						
		☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other		1980						
		☐ Chrysotile ☐ Amphibole ☐ Tremolite ☐ Actinolite ☐ Anthophyllite ☐ Talc ☐ Other		1981						

LINE ITEM: ABRAMS

November 1992

U.S. ENVIRONMENTAL PROTECTION AGENCY						COMPANY NAME AND ADDRESS (Name as reported in Item 1 on page 1)				
REPORT OF COMMERCIAL AND INDUSTRIAL USES OF ASBESTOS Continued										
F. IMPORTATION OF ARTICLES CONTAINING ASBESTOS COMPONENTS										
Enter the following information for each article that you imported in 1981. Classify your imports according to the lists in section C or D.										
Article name (Give one article per line) (1)		Total annual imports (2)				Asbestos components (Also one line per component) (3)	Continued Item (2)			
Code number	Generic name	Year	Quantity	Unit of measure	Value U.S. dollars					
		1979								
		1980								
		1981								
		1979								
		1980								
		1981								
		1979								
		1980								
		1981								
G. EMPLOYEES										
Record the number of employees at the reporting site in each of the categories below. Count each employee in one category only.										
						Number of employees	Continued Item (2)			
(1) TOTAL number of employees at plant site (Sum of 2, 3, 4, and 5) _____						405				
(2) Number of production employees _____						2				
(3) Number of employees in shipping, receiving, and moving _____						4				
(4) Number of maintenance employees _____						2				
(5) Number of other employees _____						397				
H. SUMMARY OF CURRENT WORKER EXPOSURES										
This section requires you to report, by category of production workers, the arithmetic mean of the 8-hour time weighted average (TWA) and ceiling concentration exposure levels for all employees at the reporting site. Report for all employees for whom you have determined a TWA and according to each production line making the reported products. The instructions include a worksheet for making necessary calculations (see Appendix B).										
Code number	Product name (1)	Representative activity (2)	Production work category (3)	Number of employees (4)	8 hr. time weighted average				Ceiling concentration (ppm) (8)	Continued Item (2)
					Asbestos content of domestic material (5)	Standard deviation (6)	Total number of employees exposed (7)	Number of non- detectable measurements (9)		
	Not applicable	Mining and quarrying	Miner operations (includes all employees working in mines, including underground)							
			Miner operations (includes all employees working in production areas of mine)							
114	OXYGEN SENSOR	Primary production	Fiber introduction operations (includes blending, mixing, bag making, bagging, refilling, etc.)							
		Primary production and secondary operations	Wet mechanical operations (includes machining, saw- ing, drilling, cutting, grinding, pulverizing, weaving, etc.)							
			Dry mechanical operations (includes machining, saw- ing, drilling, cutting, grinding, pulverizing, weaving, etc.)	2	UNK					
			Other production employees							
		Primary production	Fiber introduction operations (includes blending, mixing, bag making, bagging, refilling, etc.)							
		Primary production and secondary operations	Wet mechanical operations (includes machining, saw- ing, drilling, cutting, grinding, pulverizing, weaving, etc.)							
			Dry mechanical operations (includes machining, saw- ing, drilling, cutting, grinding, pulverizing, weaving, etc.)							
			Other production employees							
		Primary production	Fiber introduction operations (includes blending, mixing, bag making, bagging, refilling, etc.)							
		Primary production and secondary operations	Wet mechanical operations (includes machining, saw- ing, drilling, cutting, grinding, pulverizing, weaving, etc.)							
			Dry mechanical operations (includes machining, saw- ing, drilling, cutting, grinding, pulverizing, weaving, etc.)							
			Other production employees							
(10) Sampling and analysis methods *SEE CONTINUATION OF ITEM ANSWERS - 1 ☐ Mark this box if you use the NIOSH method to sample airborne concentrations of asbestos fibers in the workplace and analyze measurements (NIOSH NIOSH Pub. No. 78-127). If you utilize other sampling and analysis methods, enter the appropriate codes for these methods listed in the instruction booklet under part I.										
(11) Enter the lowest detectable level of the measurements that your company expects to attain by the sampling and analysis methods. (Measurements below this level should be considered as "nondetectable," for the purposes of this rule.)										
I. MEASURING ASBESTOS EMISSIONS OR FIBER RELEASE										
APOB Form number _____				Date 03114050						
☐ Yes, enclosed is a separate report for this section concerning measuring asbestos emissions. ☒ No separate report										

HWB8-0032411

IN RE: ABRAMS November 1992

Enter the following information for each end product you report in section III, C, and D. If you cannot provide information by end product, provide information according to the form of waste (attachment 2).

End product		Form of waste (shards, slurry, brine or sludge, impregnated dust, or specify other)	Total annual quantity of substance waste (Short tons)	Average percent asbestos	Disposal site				Methods of disposal	Confidentiality of data
(1)	(2)				Type of land disposal facility (See instructions)	Location	Ownership	Permitted hazardous waste facility?		
Code number	Chemical name	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
114	OXYGEN SENSOR ☐ End product report ☐ Form of waste report	CUTTING SCRAPS FROM MAKING GASKETS	0.008	80 %	☐ Surface impoundment ☐ Waste pile ☐ Land treatment ☐ Land fill ☐ Storage facility ☐ Incineration and ☐ Other	☐ On-site ☐ Off-site	☐ Company ☐ Private ☐ Municipal	☐ Yes ☐ No	SCRAPS PLACED IN PLASTIC TRASH BAGS FOR TRASH PICKUP	
	☐ End product report ☐ Form of waste report			%	☐ Surface impoundment ☐ Waste pile ☐ Land treatment ☐ Land fill ☐ Storage facility ☐ Incineration and ☐ Other	☐ On-site ☐ Off-site	☐ Company ☐ Private ☐ Municipal	☐ Yes ☐ No		
	☐ End product report ☐ Form of waste report			%	☐ Surface impoundment ☐ Waste pile ☐ Land treatment ☐ Land fill ☐ Storage facility ☐ Incineration and ☐ Other	☐ On-site ☐ Off-site	☐ Company ☐ Private ☐ Municipal	☐ Yes ☐ No		

(7) You may describe in a separate enclosure any steps you take to ensure that waste does not release asbestos fibers.
☐ Yes, enclosed in a separate description of waste disposal practices. ☒ No separate report

K. POLLUTION CONTROL EQUIPMENT

On separate lines enter information about each piece of air pollution control equipment used to control asbestos emissions at your plant site. ☐ Confidential

Item number	Type of equipment (See codes)	Gas stream volume and temperature	Design flow rate (Scfm) and ESP (volts)	Estimated collection efficiency (Percent)	Normal operating schedule (Days/year)	Quantity collected annually (Pounds)	Source of emissions	Stack or chimney?	Special problems?
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
0	N/A	Volume: _____ Temperature: _____	Design flow rate: _____ ☐ Yes ☐ No	☐ Design ☐ Actual	Normal operating schedule: _____	☐ Design ☐ Actual		☐ Yes ☐ No	
		Volume: _____ Temperature: _____	Design flow rate: _____ ☐ Yes ☐ No	☐ Design ☐ Actual	Normal operating schedule: _____	☐ Design ☐ Actual		☐ Yes ☐ No	
		Volume: _____ Temperature: _____	Design flow rate: _____ ☐ Yes ☐ No	☐ Design ☐ Actual	Normal operating schedule: _____	☐ Design ☐ Actual		☐ Yes ☐ No	
		Volume: _____ Temperature: _____	Design flow rate: _____ ☐ Yes ☐ No	☐ Design ☐ Actual	Normal operating schedule: _____	☐ Design ☐ Actual		☐ Yes ☐ No	
		Volume: _____ Temperature: _____	Design flow rate: _____ ☐ Yes ☐ No	☐ Design ☐ Actual	Normal operating schedule: _____	☐ Design ☐ Actual		☐ Yes ☐ No	
		Volume: _____ Temperature: _____	Design flow rate: _____ ☐ Yes ☐ No	☐ Design ☐ Actual	Normal operating schedule: _____	☐ Design ☐ Actual		☐ Yes ☐ No	

(11) Estimate the percent of plant exhaust air that is treated by the equipment listed above: _____ %

Continuation of item answers

SECTION E, ADDITIONAL INFORMATION:

MAKING GASKETS OF ASBESTOS MATERIAL HAS BEEN DISCONTINUED AT THIS LOCATION AND WILL NOT BE RESUMED. DURABLE MANUFACTURING COMPANY LETTER CERTIFYING THAT ASBESTOS FIBER WILL NOT BE RELEASED IN EXCESS OF EXPOSURE LIMITS IN PART 1910.1001 SUBPART 2 OF THE CODE OF FEDERAL REGULATIONS (TITLE 29) DURING REASONABLE AND FORESEEABLE USE IS ATTACHED.

OSHA FORM 20, MATERIAL SAFETY DATA SHEET IS ALSO ATTACHED.

03114051