

November 1992

ALBRAMS

R & D CENTER - #601
From : DESIGN AND MANUFACTURING CENTER
WIN : 236-5435
Date : November 9, 1979
Subject:

To : ALL DIVISION AND DIVISION'S GENERAL MANAGERS

There is an announced intention by several government agencies, primarily the Consumer Products Safety Commission (CPSC) and the Environmental Protection Agency (EPA) to restrict the use of asbestos in "non-essential" applications. They have published an extensive list of products containing asbestos on which they are beginning a formal investigation in order to determine if this asbestos presents a substantial product hazard.

At present, the CPSC and EPA are soliciting comments by means of an Advance Notice of Proposed Rule Making. The EPA is considering either:

- 1) The traditional regulatory approach restricting the manufacture of asbestos by product categories, or
- 2) limiting the amount of asbestos available and allowing the marketplace to determine the use and application of asbestos.

The two agencies are combining forces on this issue in order to coordinate their actions and not duplicate efforts. This letter is written to accomplish the following:

- 1) Let you be aware of the situation, if you are not already, in order that you may evaluate the impact on your division.
- 2) Request your review for additional products which are not included in the attached lists. These lists were supplied as part of the CPSC's and EPA's Advance Notice of Proposed Rule Making.
- 3) To solicit your comments on this proposed rule. Comments should be sent to me for compilation, review for consistency and for clearing with the law department.

Further details on the areas in which they are soliciting comments are given in the attachment. This is our opportunity to influence the direction of the government policies before they become fixed. Therefore it is imperative that you make comments that will help us influence the government agencies and that these comments be sent to me by December 3, 1979.

John F. Gormley
John F. Gormley, Director
Product Safety & Integrity

gmc
Discard Date:
Attachment



NWBB-0034899



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Attachment

Issues highlighted for comment (Federal Register/Vol. 44, NO202/Wednesday, October 17, 1979, pp. 60056 - 60068).

- 1) How can the agencies (CPSC & EPA) obtain information necessary to make informed decisions concerning asbestos while considering industry's and the general public's interest in avoiding unnecessary reporting burdens? How can the agencies needs for information be met while protecting industry's legitimate interest for preserving confidentiality?
- 2) The CPSC initially proposes to seek elimination of all non-essential uses of asbestos in consumer products from which asbestos fibers are released during reasonably foreseeable use or misuse. They are asking, is their approach sound, and under what circumstances should the commission consider action to address essential uses of asbestos in consumer products from which fibers are released.
- 3) How should the CPSC determine what constitutes an essential use of asbestos? How much weight should be given to cost, availability, utility or safety of substitutes for asbestos?
- 4) The CPSC believes it can take action on the basis that asbestos fibers are being emitted from a product. Comments are solicited on what situations should quantitative measurements of asbestos fiber emission be attempted.
- 5) The Commission intends to consider regulation of asbestos on a generic basis (classes of consumer products, etc.) rather than on a case-by-case basis. What are the advantages and disadvantages of this approach?
- 6) The CPSC does not intend to employ quantitative estimates of cancer risks posed by exposure to asbestos fibers in making regulatory decisions concerning consumer products. Is this approach appropriate to the regulation of the risks posed to the public? The CPSC requests more information concerning qualitative or quantitative studies of asbestos fiber emission from particular consumer products. Any such information available would help to identify products which should receive priority attention.
- 7) What categories or individual products and uses containing asbestos do not present a health hazard to users? Why?
- 8) What asbestos-containing individual products or categories might be considered essential because of significant benefits and/or lack of reasonable substitutes? What are the specific benefits and costs?

NW88-0034100

CPSC LIST

Asbestos paper products
 Acoustical ceiling tile
 Lamp sockets
 Burner mats for gas stoves
 Roofing felts (outer layers)
 Pipe and boiler covering
 Vinyl sheet flooring backing
 Radiator top insulation
 Appliance heating shielding (paper)
 Slow cookers
 Hair dryers
 Paper sheets for heat insulation
 Millboard
 TV & other electronic switch plates
 Electric switch boxes
 Metal reinforced gaskets (for air-cooled engines)
 Electrical washers
 Linings for ovens, kilns, safes, safety boxes, incinerators
 Millboard sheet
 Wall protection behind heat-generating products
 Floor protection under wood and coal stoves
 Soldering and welding blocks
 Iron rests
 Appliance heat shielding (millboard)
 Toasters
 Rotisserie broilers
 Fireproof wallboard
 Metal-clad fire doors & partitions
 Tent grommets
 Stove pipe rings
Cloth and woven products
 Flexible air conductor for heating, cooling & ventilating equipment
 Appliance wiring
 Barbecue fire starters
 Broilers
 Curling irons
 Electric blankets
 Hair dryers
 Heating pads
 Ranges
 Toasters
 Irons
 Deep fat fryers

EPA LIST

Automotive Repair
 Mufflers
 Brake linings
 Clutch facings
 Custom auto body filler
 Metal deadener
Household Materials
 Appliance wiring
 Counter surfaces
 Electrical cord
 Filler for shoe soles
 Floor tile
 Hair dryers
 Heat protective mats
 Ironing board pads & covers
 Lamp mantles
 Lamp sockets
 Pottery kilns
 Slow cookers
 Toasters
Safety Equipment
 Aprons
 Arm protectors
 Blankets
 Boots
 Caps
 Clothing
 Curtains
 Draperies
 Gloves
 Hats
 Helmets
 Hoods
 Mittens
 Overgaiters
 Sleeves
 Suits
 Umbrellas
 Aerial distress flares
 Ammunition shell wadding
 Catalytic heater mantles
 Tent grommets
 TV sets & projector equipment
Home Building repairs
 Latex paints
 Texture paints
Commercial applications

CPSC LIST (Cont.)

Electric fry pans
 Awnings
 Candlesticks
 Catalytic heater mantles
 Cigarette lighter wicks
 Cord
 Seals for high temperature gaskets
 Valve steam packings
 Insulation for glass handling tools
 Reinforcing for braided wall stem hose
 Theater curtains
 Felt
 Reinforcements in plastics
 Gaskets
 Reinforcement in asbestos tapes
 Secondary insulation in high temperature wire and cable
 Asphalt impregnated roofing felts
 Piano & organ felts
 Heating pads (element insulation)
 Ironing board pads and covers
 Lamp and lantern mantles
 Pipe and boiler covering
 Pot holders and oven mitts
 Flame resistant garments
 Gloves
 Hats
 Helmets
 Hoods
 Mittens
 Overgaiters
 Sleeves
 Suits
 Umbrellas
 Aprons
 Arm protectors
 Flame-resistant blankets
 Boots
 Caps
 Smokers bibs
 Stoves - Coal & wood burning
 Tape for pipe insulation
 Braid and rope for packing
 Motion picture screens
 Tent grommets

EPA LIST (Cont.)

Aluminized cloth
 Bags
 Bearings
 Belting
 Blocks
 Boards
 Braid
 Buffing & polishing compounds
 Cloth
 Cord
 Diaphragms
 Drier felt
 Drilling fluids
 Fabrics
 Felt
 Filtering material
 Metallic cloth
 Millboard
 Paper
 Pipe & boiler covers
 Pottery Clay
 Plywood patch
 Sheet flooring
 Table tops
 Tape
 Textiles
 Welding electrodes
Asbestos cement products
 A/C air duct
 A/C pipe
 A/C sheet
 Baking sheets
 Cement boards
 Clapboard
 Roofing
 Shingles
 Siding
 Tile
Molded products
 Gun grips
 Filler & reinforcement in plastic
 Pond liners
 Phenolic laminates
 Resins
 Rheostat backing
Roofing Materials

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CPSC LIST (Cont.)

Asbestos cement products
Water, sewer & septic drain field pipe
Air duct pipe
Sheet products
Roofing clapboard
Siding
Shingles
Interior walls
Boiler & furnace baffles
Bulk sheeting
Welding shields
Baking sheets
Blackborads
Laboratory table tops
Linings for vaults, safes,
humidifiers & filing cabinets
Viscous Matrix Products
Adhesives (glues & epoxies)
Air duct cement for asbestos-cement
air duct
Buffing & polishing compounds
Caulks and putties
Floor tile cement & mastic
Auto body filler
Flashing cement
Furnace cement
Glazing compound for ceramics
Pipe and boiler coverings
Roof and driveway coatings
Stains and varnishes
Automotive metal deadener
Automotive undercoating
Refrigerator cements
Automotive muffler repair compounds
Products subject to inadvertent
asbestos contamination
Driveway gravel
Fertilizer & lawn care products
Potting materials (vermiculite)
Talc for noncosmetic or food
use applications
Acoustical & thermal insulation
material sprayed
Ammunition shell wadding

EPA LIST (Cont.)

Aluminum roof coating
Roof patch
Roofing felts
Roof preservative
Sealants & mastics for Consumer
& commercial use
A/C pipe joint sealant
Adhesives
Caulking compounds and putty
Furnace cement
Glazing compound
Radiator sealant
Varnish

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CPSC LIST (Cont.)

Automotive mufflers
Barbecue firebed materials in gas
 barbecue grills
Boat hull repair kits
Flower pots
Friction materials
Clutch plates
Brake linings
Potters kilns (home hobby)
Pottery clay
Powder (asbestos)
Bulk fiber
Reinforcement in molded plastics
 and rubber
Automotive radiator sealant
Vinyl asbestos floor tiles
Abrasive wheels
Aerial distress flares
Molded plastics and Phenolic laminates
Paint
Textured paint
Cement, drywall & plaster patching
 compounds
Artificial gas fireplace emberizing
 material
Phonograph records
Consumer products possibly con-
 taining asbestos
Air conditioners
Dishwashers
Hand-held mixers
Portable electric heaters
Popcorn poppers
Refrigerators
Vacuum cleaners
Waffle makers
Carpet padding
Fireplaces
Instant
Light fixtures on railroad
 passenger cars
Welding masks
File cabinets