

November 23, 1992

Mr. George J. Tomchick, Jr.
Area Director
U.S. Department of Labor
Occupational Safety and Health Administration
Allentown Area Office
850 North 5th Street
Allentown, PA 18102

RE: OSHA Referral No. 901056655

Dear Mr. Tomchick:

This letter is in response to Mr. Leonard J. Renner's letter of October 27, 1992 regarding the above OSHA referral.

As the Director of Industrial Hygiene for Saint-Gobain Corporation, the parent company of CertainTeed, I appreciate the opportunity to respond to Mr. Renner's letter, regarding asbestos cement (A/C) pipe adapters manufactured by CertainTeed.

The adapters referred to in Mr. Renner's letter are manufactured at CertainTeed's only remaining A/C pipe production facility in Riverside, California. A pipe adapter is a product made from an asbestos cement matrix which is cured to a hardness equivalent to that of concrete. Under normal conditions of use and designed purpose this product will not release asbestos, as it is not normally drilled or sawed. The intended purpose of a pipe adaptor in it's final manufactured shape and form is used to join A/C Pipe to PVC Pipe.

In a recent visit to the plant, I reviewed the labeling procedure for all the A/C products, including pipe adapters. Normally, twenty to fifty of the adapters, depending on their size, are shipped in a cardboard box on a pallet. Two labels, identifying the adapters as being an asbestos-containing product are placed on two sides of the box as well as on the top flaps prior to storage in the storage yard. Photographs of a typical box as it would be shipped from our facility are included in Attachment I - Photos 1 and 2. Samples of the labels are included in Attachment II.

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We have, over the years had some problems with labels weathering, fading and falling off, as the labels are exposed to the elements while in storage. However in more recent times we have corrected this problem with a stronger label adhesive. In Attachment III - Photo 3, the adapters contained in the weathered cardboard on the pallet to the left were manufactured January 30, 1990, and the labels ^{are} still intact almost two years later. ^{NOTE}

Without seeing the cardboard container or the contents, I have no explanation as to why the container in question did not contain a label at the time of the inspection in the State of Washington. Perhaps the box had been dismantled, lost its label or the adapters were transferred from the original shipping carton.

As you can see from the photos (Attachment IV - Photos 4 and 5) the size and design of the adapters makes labeling each piece difficult. The grooves both on the inside and outside of each adaptor leaves only a very small area to apply a label. Since this referral, we have made the decision to apply labels to each individual pipe adapter at the time of manufacture. Should these labels become unglued, we will also continue the current practice of labeling the outside of the cardboard container.

As a further note, CertainTeed, with each shipment includes a packet of information which is given to the truck driver for delivery to the consignee with the load. An example of this packet and the contents are attached (Attachment V). This packet contains the following:

- A. Envelope (with specific instructions printed on the outside)
- B. Bill of Lading (stapled to the outside)
- C. Load Order
- D. An MSDS for FLUID-TITE Asbestos Cement Pipe and Fittings
- E. A Booklet entitled "How To Install A/C Utilizing Closure Couplings & Closure Lengths"

In addition, our sales representatives distribute two brochures to each customer. These brochures are also available to anyone upon request:

- "Recommended Work Practices for A/C Pipe - A/C Pipe Producers Association" (as referenced on the "Caution" label) - Attachment VI.
- "CertainTeed A/C Pressure Installation Guide - Distribution and Fluid Transmission Pipe Systems" - Attachment VII.

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Please be advised, due to economic situations, CertainTeed Corporation will within the next several months be closing the Riverside facility and leaving the asbestos cement pipe business. Be assured that we will continue to comply with all of the OSHA Hazard Communication regulations until our supply of A/C products is completely exhausted.

Saint-Gobain and CertainTeed Corporations endeavor, in all of our product lines to assure the safety and health of not only our employees, but also of the end-users of our products. We appreciate OSHA and the State of Washington Division of Safety and Health alerting us to this situation and hope that the correction documented here will be to the satisfaction of both agencies, and will serve to protect the users of CertainTeed products.

I appreciate your time and effort and look forward to your response. If you have any questions concerning this matter please contact me at (215)341-7713.

Sincerely,

Janis W. Reynolds
Director, Industrial Hygiene

c: John McGinley: VP, PPG: CertainTeed - VF 2125 3B
James Burke: Plant Manager PPG - Riverside 0260

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