R&D CENTER, Bldg. 601 2A49G
From Design & Manufacturing Center
W/N 236-5435
Date December 20, 1979
Subject

78-1-00-513

To GATEWAY CENTER

B. A. Kerns
P. Palmieri
R. E. Wills

R&D CENTER

C. W. Bickerstaff
D. Whittier

The attached letter was sent to the Consumer Protection Safety Commission with a copy to the EPA on Thursday, December 13, 1979.

Thank you for your help on this matter.

John F. Gormley

John F. Gormley, Director
Product Safety & Integrity

JFG/gmc

Attachment

[redacted]

Discard Date:

03112332

IN RE: ABRAMS DECEMBER 1992

Westinghouse
Electric Corporation

Research and Development Center
[illegible]
[illegible]

December 10, 1979

Office of the Secretary
Consumer Products Safety Commission
[illegible] 6th Street N.W.
Washington, D.C. 20207

Subject: ASBESTOS, 44 FEDERAL REGISTER 60057, October 17, 1979

Gentlemen:

The following comments and information are supplied in answer to your request published in the Advanced Notice of Proposed Rule Making.

1. Bonded asbestos is used in electrical transformers to insulate components electrically. During assembly it is varnish impregnated which serves as additional protection from release of fibers. No fibers are emitted during normal use or reasonably expected misuse of this product. The bonded asbestos material is sealed by the varnish and the entire section containing asbestos is removed during repair. Therefore there is no release of fibers anticipated during repair and/or disposal.

   Asbestos is also used as a gasket material in residential air conditioners. This is used in a hermetically sealed unit which is normally not repairable. Asbestos gaskets are also used in larger units which may not be hermetically sealed but because of their size and cost they are replaced by skilled personnel and there should not be significant release. No satisfactory substitute has been found for asbestos in gasket and packing applications.(1)

2. Westinghouse agrees with the elimination of all non-essential uses of asbestos in consumer products from which asbestos fibers are released during reasonably forseeable conditions or duration of use, including misuse. However, Westinghouse believes that regulation by performance standards for individual asbestos containing products, as opposed to a "generic" or broad approach regulation, will permit the Commission to employ the factors enumerated in the announcement for determining whether a use is essential. The "release of asbestos fibers" must be defined by a standard test; i.e., product tested in a clean environment at a specified air flow rate for a specified time. Thus, it is not appropriate to just consider the "fact of asbestos fiber emission." The Commission must make a quantitative assessment.

(1) E.P.A. 560/6 - 78-005. TR 77-515 Aug. 78, p. 223

IN RE: ABRAMS DECEMBER 1992

In addition, "essential" must be defined, especially as it relates to the benefit derived, such as protection from extreme heat or electrical shock, and availability of substitutes. As stated before in Item #1, there is no known substitute for asbestos in gaskets.

3. The use of asbestos in products depends upon the function of the material, the availability of substitutes (for technical and safety reasons) and cost. Any limitation on the total production of asbestos would subject the availability of asbestos to marketplace factors. This might raise the cost to those manufacturers who require this material for their products but who do not use sufficient quantities to keep the costs from being prohibitive or inflationary. Selective elimination of the uses of asbestos on the other hand would reduce demand first, thus being less inflationary.

4. Regulation or possible elimination of use of asbestos must be considered on some rational basis such as cost-benefit analysis and must include considerations of availability, suitability and safety of alternative materials. Westinghouse has had a formal, organized, concentrated effort to eliminate asbestos from its products for at least four years and has eliminated it in most applications. A few examples are turbine engine insulation, insulation for hot piping, and in fluorescent lamp fixtures. However, in some of its products it has not found satisfactory substitutes. These applications primarily involve high temperature, high pressure or corrosive environments.

5. Any regulation for use of asbestos on a product or in a piece of equipment containing an asbestos product must consider the potential impact on existing equipment. This equipment has been designed for the use of particular gasket material and while substitutes may be available for newly designed equipment, the size, compressibility of the substitute material may not function properly in the same envelope. Further, to replace the entire piece of equipment because of unavailability of a small fraction of the total would be extremely burdensome financially.

John F. Gormley

John F. Gormley, Director
Product Safety & Integrity

gmc

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