FILE NAME: DuPont Remington (DRM)

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DOCUMENT DESCRIPTION: Handwritten Memo from J.R. Martin to D.J. Willette - Use of Asbestos Fibers - EPA & CPSC ANPR's (Not Sent)

asbestos

NOT SENT
See NKW file
new spec
comments.

To: D.J. Willetts

From: J R Martin

Use of Asbestos Fibers - EPA and CPSC ANPR's

We have received these proposals and have the following comments:

B We have not searched the Company chemical inventory but only know of use of asbestos as a raw material in one DuPont product - shot gun shells. Remington should comment on impact in this use.

The assumption that all substitute products with similar morphology are carcinogenic until proven otherwise seems drastic unless further definition of required proof is given. For example, current studies have not shown fiberglass to cause cancer. Is this proof sufficient. Proof of a negative is never absolute.

The suggestion that (1) all uses be banned where possible regardless of benefits to be gained or (2) a quota be set on mining + importation seems ineffective. It would be much better to study what uses contribute most to airborne asbestos and work on these. For example in a New York school a large sum of money was spent to remove asbestos ceilings without achieving any depletion in the concentration of airborne asbestos - most of it was coming from traffic.

DUP 1130556

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- PSC plans to eliminate all non-essential uses of asbestos ~~use~~ in consumer products from which asbestos fibers are released during reasonably foreseeable conditions of use including misuse. ~~If~~ Almost any product containing asbestos could be misused to cause a hazard. Further definition of misuse should be given. Do the words "reasonably foreseeable" apply to misuse?

DUP 1130557

It seems likely that substitution for asbestos in some cases may increase other hazards e.g. flammability. This should be examined carefully before substitution is mandated.

Once again the no threshold assumption is being used. ~~It's old hat but~~ We should probably keep attacking this concept whenever it comes up.

CPCS Issues

1. I know of no product produced by DP that contain asbestos and can not listed in the table.

5. Quantitative data should be used in all cases except trivial ones. The respirable fraction should be considered.

7. I would think some estimate of exposure risk would be necessary for the regulation to stand up in court.

DUP 1130558