

FILE NAME: Packings and Gaskets (PAG)

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DOCUMENT DESCRIPTION: Letter - Offer to Sell Asbestos-Containing Flanges and Valves



James R. Millette, Ph. D., Director
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Norcross, Georgia 30093

Dear Dr. Millette

Offer To Sell Asbestos-Containing Flanges and Valves

As we discussed, I wish to sell some used flanges and valves with asbestos containing gaskets and valve packing, that I salvaged from a wood products mill powerhouse in Oregon prior to its demolition. These materials are described in the following enclosed information:

1. Photo (1 p), and summary "Description of Salvaged Flanges and Valves" (1 p);
2. The pre-demolition Field Inventory entitled "Table 1. Salvagable Flanges By Size And Location" (1 pp), which guided my salvage of about 190 flanges and about 30 valves, and;
3. Lab reports on asbestos content of twelve gaskets removed from seven typical salvaged flange units and two types of gasket materials found in the mill powerhouse shop (6 pp).

Background

For five years (1990 -1995), and for several gasket manufacturers (Garlock, Anchor and Klinger), I tested asbestos release during typical installation and/or removal of asbestos gaskets and valve packing, and testified in court or depositions on my results as a defense witness. I designed my gasket tests to verify and extend similar tests by Carl Mangold, with whom I also jointly tested valve packing removal and replacement with Garlock/Anchor products. A major hindrance was locating enough suitable used flanges and valves for removal tests. A single series of my (4) gasket removal tests took 50 flanges.

I spent much time for Garlock searching for flanges and valves to test. Thus, I was surprised when they initially declined these materials in 1994, which



were by far the best group I ever found in terms of number, documentation, and physical condition. So I bought and stored them myself, anticipating a demand for further removal tests - e.g. to address short term worker exposures.

Eighteen months later, when I had to move my 3.5 tons of salvage from free to rental storage, Garlock agreed to pay transfer and annual storage costs in exchange for the option to meet any bona fide purchase offer I received for some or all of the materials (right of first refusal). I temporarily agreed, because I was assured that Garlock would expeditiously inspect the materials and make a purchase offer. Neither occurred, however, so after two years I contacted you. I have contacted no one else about these materials as of this writing.

Since we last talked I have consulted counsel, and notified Garlock that our prior agreement has expired and that I intend to market these materials.

Response Requested

I'd like to discuss your interest in these materials, or others who might be interested. Call me at work (503-823-3244) or at home (503-297-3727).

The materials may be inspected in southeastern Oregon, subject to my making arrangements, and payment of my own time and expenses to accompany whomever inspects them. This must occur on a weekend, due to my current full time position. I look forward to hearing from you soon, say by August 15th.

Sincerely yours,


Robert L. Gay, Ph.D.,
Consultant

Encl: Information listed above (10 pp, plus photo)

Description of Salvaged Flanges and Valves

In August, 1994, about 190 flanges and about 30 valves - weighing over three tons - were salvaged from an old steam powerhouse at a wood processing mill in southeastern Oregon just prior to its demolition. Flange diameters ranged from 4" to 12". Flanges and valve tees (valve with 2 flanges) were limited to sizes that could be lifted and carried by one person. Sixteen flange types and sizes were selected and tagged, to afford a good representation of the entire facility. Most were placed in secure, local storage so the dry climate would assure minimal rusting over time. Twelve examples of seven of the more numerous flange types collected were opened and their gaskets tested for asbestos (flange type tag #s 1, 2, 3, 6, 10, 11b, and 16; photo enclosed). Two scraps of unused gasket material found in the depleted powerhouse shop were also salvaged and tested.

Regarding the history and brands of gasket and packing material used at this facility, current mill personnel and two retirees associated with the old powerhouse were interviewed. The powerhouse operated from 1928 through the early 1990s. Through the mid 1970s, gasket material was mainly from Garlock and later Anchor, and considerable Anchor valve packing was used. Later Anchor and Chesterton replacement gasket materials were used, with some Flexatatic™ and non-asbestos materials used in recent years. According to the last steam fitter (GB) who maintained these systems for the 22 years ending in 1994, many salvaged flanges should contain Anchor or Garlock gaskets, because so few were ever changed during his tenure, due to lack of need (no leakage) and infrequent plant downtime.

Unused gasket material from the powerhouse shop included Anchor "Twicom®" and Chesterton No. 211®, which tested at 35% and 40% chrysotile, respectively. All twelve gaskets tested had 35%-45% asbestos, except one at 65%. No non-asbestos gaskets were found. An inner layer of metal sheet or wire mesh found in two thirds of the gaskets tested and in the Anchor "Twicom®" gasket material, was estimated by the lab to account for 10-15% of total gasket weight. No valve packing was removed or tested.

Too few markings were distinguishable on removed gaskets to establish their brand, due mainly to surface stains. According to current (GB) and retired (FWB) steam fitters interviewed, there was a longstanding practice at this mill of using a mixture of oil and graphite on new gaskets to ease their release in later replacements. All gaskets removed had graphite and heavy stains on their surfaces.

Encl: Enlarged color copy of 4" x 6" photo of salvaged units selected for gasket testing

6/29/98