Interoffice Memo

Hoechst Celanese

PLAINTIFF'S EXHIBIT

CEL-1176

Date: October 6, 1989

To: T. W. Pruitt - 278
F. H. Reed - 220

Dept/Location:

From: T. W. Scott

Dept/Location: Charlotte 264

TWS-89-64

Subject: **EPA's Asbestos Gasket Ban**

During our recent Industrial Hygienists' quarterly meeting, the IH's voiced some concern over EPA's ban on asbestos gasket materials. The attached letter (TWS-89-53) is an overview of the regulation (40 CFR 763). Please note that during Stage 2 of the ban, the manufacture of asbestos sheet gaskets must cease by August 25, 1993, and the distribution of such products must cease one year later.

Although EPA contends that non-asbestos replacement materials will be "economically" available when the ban becomes effective, the Fibers and Film Industrial Hygienists are of the opinion that such a transition may not be as easy as EPA would have us believe. Subsequently, it was thought that a concerted effort among our facilities might be warranted. Both of your names were mentioned during the meeting as being in a position to get such an effort going if such an effort is deemed worthwhile among the facilities. It just seems logical to us that if each facility will be addressing the same problem (to find adequate non-asbestos replacements), there was no need perhaps for everyone to invent the same wheel over again.

Two critical issues were discussed at our meeting regarding replacement materials:

1. Non-asbestos replacement materials that meet the same performance specifications are, generally speaking, more expensive than their asbestos containing counterparts. Some information already received indicates a cost increase of as much as 2 to 3 times for non-asbestos replacements, and when you talk about the thousands of gaskets used at our facilities, the total cost differential could be substantial. We don't have a real good handle on the economic impact of the ban in our facilities, and we think it's a good idea for management to at least be prepared for a substantial increase if that is indeed the case.

2. Many non-asbestos materials do not perform as well as their asbestos containing counterparts. Non-asbestos materials could very well result in decreased service life and a greater number of failures. Critical failures could feasibly result in process upsets and safety hazards. It is not too early

to start finding candidate replacements so evaluations can made in a timely and controlled manner.

Tom Scott

Tom Scott

Attachment

cc: B. T. Bowyer - 264
C. A. Branney - 264

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