

JUL 10 1968

Gypsum Association

502a/b

201 North Wells Street, Chicago 60606

PLAINTIFF'S
EXHIBIT
WRG-479

July 9, 1968

Mr. M. Milton Glass, Chairman
Board of Standards and Appeals
City of New York
80 Lafayette Street
New York, N. Y. 10013

SUBJECT: Calendar No. 118-68-GR

Dear Chairman Glass:

Having had an opportunity to study the proposed rule, as well as the transcript of the hearing of May 10, 1968, concerning the application and protection of spray-on asbestos fire proofing, the Gypsum Association would like to submit a few comments for your consideration.

The Gypsum Association and our member companies do concur with the intent of the proposed rule. We are aware that similar situations have arisen in other areas and that similar rules have been applied.

We see no reason why cementitious type fireproofing materials should be included in this ruling in that there is little similarity between cementitious and asbestos fibered materials. Cementitious materials are comparatively hard setting materials, where asbestos sprayed fiber materials are soft. There is no dust residue from the sprayed application of cementitious materials. This is the real problem of confining the dust residue from the spraying-on of asbestos fibered material. Most important is that the density of cementitious material is predetermined in the dry goods and cannot be altered by the mechanic doing the spraying.

If a problem had been experienced with cementitious type materials, we are sure that they would have been included by the Building Department in their comments. The only recommendation made to include cementitious type materials under this new rule was made by the president of the Spray Mineral Fibered Manufacturers' Association, Inc., and therefore is a little biased if not plain old fashioned "sour grapes". If, however, cementitious materials are to be included in this proposed rule, one change should definitely be made.

Mr. John Nevins, National Cystine Co.
Mr. L. A. Barron, Vermiculite Institute