FILE NAME: Kaiser Gypsum (KG)

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KAISER CEMENT CORPORATION and KAISER GYPSUM COMPANY, INC.

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SOLANO

In Re: Related Asbestos Cases Consolidated For Discovery (McQuaid, Bedford & Brayton)

NO: 1327

ANSWERS TO INTERROGATORIES

PROPOUNDING PARTY: Plaintiffs

RESPONDING PARTY: Defendants, KAISER CEMENT CORPORATION and KAISER GYPSUM COMPANY, INC.

SET NO: TEN

DATED: 10/25/85

COME NOW defendants KAISER CEMENT CORPORATION (hereinafter "KAISER CEMENT") and KAISER GYPSUM COMPANY, INC. (hereinafter "KAISER GYPSUM") and in answer to the Tenth Set of Interrogatories propounded by plaintiffs state as follows:

KINCAID, GIANUNZIO, CAUDLE & HUBERT

By: Curtis A. Canfield
CURTIS A. CANFIELD, ESQ.

LIST OF PRODUCTS CONTAINING ASBESTOS
Manufactured by
KAISER CEMENT CORPORATION(1)

PRODUCT/TRADE NAME	PURPOSE OF PRODUCT	DESCRIPTION OF PRODUCT	COMPOSITION	% ASBESTOS (Approx.)	YEARS CONTAINING ASBESTOS (2)	PLANTS WHERE MANUFACTURED(2)	REGION OF DISTRIBUTION(2)
Kaiser Plastic Gun Cement	Used to make stucco for the exterior of houses and other buildings (applied by gun)	Gray colored powder. Packaged and sold in sacks of varying sizes and also in bulk.	Primarily powdered portland cement. The asbestos used in this product was chrysotile.,	2-5% (3)	1960-74	Permanente (Calif.) Cushenbury (Calif.)	Northern and Southern California
Kaiser Plastic Cement (Hand)	Used to make stucco for the exterior of houses and other buildings (applied manually with a trowel).	"	"	1-5% (3)	1961-73	Permanente (Calif.) Cushenbury (Calif.) (1963-64 only)	"
Kaiser Masonry Cement	Used in masonry mortar in building construction.	"	Primarily portland cement. The asbestos used in this product was chrysotile.	0.4% (3)	1972-77	Cushenbury (Calif.)	Arizona (primarily Phoenix)

(1) Kaiser Cement Corporation was known as Permanente Cement Company from 1939-64 and as Kaiser Cement & Gypsum Corporation from 1964-79.

(2) The information in the "Years Containing Asbestos" column pertains to the company as a whole -- the individual plants listed in the "Plants Where Manufactured" column did not necessarily manufacture each product during all of the stated years. Similarly, the areas indicated in the "Region of Distribution" column did not necessarily correspond to all of the stated years.

(3) Contractors typically mixed these products with three to five parts by weight of sand so the % asbestos was less than 1% in the product actually applied.

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PRODUCT/TRADE NAME	PURPOSE OF PRODUCT	DESCRIPTION OF PRODUCT	COMPOSITION	% ASBESTOS (Approx.)	YEARS CONTAINING ASBESTOS (1)	PLANTS WHERE MANUFACTURED (1)	REGION OF DISTRIBUTION (1)
Texture Paints:							
Kaiser Cover-Tex Wall Texture	Used to produce texture effects over gypsum wallboard surfaces.	White to off-white powder. Packaged and sold in sacks of 25 to 50 lbs.	Primarily casein, limestone and mica. The asbestos used in this product was chrysotile.	4-6%	1956-75		
Kaiser K-Spray Ceiling Texture	Used to produce texture over gypsum wallboard or interior concrete ceilings.	White powder with polystyrene aggregate. Packaged and sold in sacks of 25 to 50 lbs.		1.3-6.6%	1969-75		
Ceiling Board:							
Kaiser Mineral Fibreboard - UL Fire-Rated (Underwriters' Laboratories, Inc. design)	Used for acoustical ceiling tile and lay-in board and partition sound-deadening board.	1/2" or 5/8" thick by 12" or 24" wide by 12', 24' or 48' long sheets, with face side white or colored and with perforated or fissured design for acoustical treatment. Packaged and sold in boxes of various quantities.	Primarily mineral wool and various wood fibers, clays and starch. The asbestos used in this product was chrysotile.	1.6%	1965-74	St. Helens (Oregon)	National, but largely in western states
Wallboard:							
Kaiser Gypsum "Null-A-Fire" Type X Wallboard	Used for interior walls and ceilings.	1/2" or 5/8" thick by 4' wide by 8' or 12' long sheets, covered with gray or manila colored paper. Two sheets were bound together for purposes of sale.	Primarily gypsum, plus additives of glass fiber, paper fiber and vermiculite. The vermiculite contained two 100ths of 1% tremolite (a type of asbestos) which was considered an impurity and was totally encapsulated in the vermiculite.	0.02%	1969-78	Antioch (Calif.) Long Beach (Calif.) Seattle (Wash.) Rosario (New Mexico) Delanco (New Jersey) Jacksonville (Fla.)	All western states, Texas and east coast states.

(1) The information in the "Years Containing Asbestos" column pertains to the company as a whole -- the individual plants listed in the "Plants Where Manufactured" column did not necessarily manufacture each product during all of the stated years. Similarly, the areas indicated in the "Region of Distribution" column did not necessarily correspond to all of the stated years. For example, the Jacksonville and Delanco plants were not built until 1964 and 1965, respectively; thus, distribution of products on the east coast did not commence until some time after the plants were completed.

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PRODUCT/TRADE NAME	PURPOSE OF PRODUCT	DESCRIPTION OF PRODUCT	COMPOSITION
Joint and Topping Compounds:			
Kaiser Joint Compound-Dry Powder	Used to fill gypsum board joints, embed joint reinforcing tape, finish joints and to cover and finish nailheads and metal cornerbead.	White to off-white powder. Packaged and sold in sacks of 25 to 50 lbs.	Primarily finely ground materials including casein, clay, talcs, limestone and mica. The asbestos used in this product was chrysotile.
Kaiser Finishing (Topping) Compound	Used to top and finish gypsum board joints.	"	"
Kaiser One-Day Joint Compound	Used to fill gypsum board joints, embed joint reinforcing tape, finish joints and to cover and finish nailhead and metal cornerbead.	"	"
Kaiser 3-Purpose Compound	Used to tape, top and finish gypsum board joints, nailheads and metal cornerbead.	"	"
Kaiser Pre-Mix Joint Compound	Used to fill gypsum board joints, embed joint reinforcing tape, finish joints and to cover and finish nailheads and cornerbead.	White to off-white or light buff colored paste. Packaged and sold in buckets ranging from 12 to 62 lbs., and in cartons of 5 to 50 lbs.	"
[redacted]	Used to top and finish gypsum board joints	"	"
Kaiser Dual Purpose Pre-Mix Joint Compound	Used to fill gypsum board joints, embed joint reinforcing tape, finish joints and to cover and finish nailheads and metal cornerbead.	White to off-white or light buff colored paste. Packaged and sold in buckets ranging from 12 to 62 lbs., and in cartons of 5 to 50 lbs.	Primarily finely ground materials including casein, clay, talcs, limestone and mica. The asbestos used in this product was chrysotile.

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...by
...HANY, INC.

% ASBESTOS (Approx.)	YEARS CONTAINING ASBESTOS (1)	PLANTS WHERE MANUFACTURED (1)	REGION OF DISTRIBUTION (1)
6.8-10.4%	1953-75	Santa Ana (Calif.) Antioch (Calif.) Seattle (Wash.) Delanco (New Jersey) Jacksonville (Fla.)	All western states including Hawaii and Alaska, New England, and all east coast states.
3.7-11%	1961-75	"	"
3.3-3.4%	1968-75	"	"
4.8-4.9%	1969-75	"	"
1.5-6%	1960-75	"	"
0.9-2[redacted]	1969-75	"	"
1.5-6%	1960-75	Santa Ana (Calif.) Antioch (Calif.) Seattle (Wash.) Delanco (New Jersey) Jacksonville (Fla.)	All western states including Hawaii and Alaska, New England, and all east coast states.