

KAISER GYPSUM COMPANY, INC.

KAISER CENTER - 300 LAKESIDE DRIVE

OAKLAND, CALIFORNIA 94604

March 1, 1972

PLAINTIFF'S EXHIBIT

KG-54

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DEFDOC/KAIS  
PISPRY

Environmental Protection Agency  
Office of Air Programs  
Division of Compliance  
Research Triangle Park, North Carolina 27711

Gentlemen:

As users of asbestos in some of our products, we had our representative attend your public hearing in Los Angeles on February 15-16, 1972.

We were interested to hear that the proposed prohibition of the spraying of any asbestos-containing product on any portion of a building or structure included in its broad terms spray applications which the EPA was unaware of but did not necessarily mean to ban. We refer to those operations where the asbestos-containing product is slurried before spraying and adhesives coat and enclose the asbestos fibers in a bonding matrix.

We market products which are used as decorative ceiling and wall textures over gypsum wallboard. They reduce housing construction costs by eliminating certain costly finishing steps and through labor-saving spray application.

We also market products which are used as surfacing compounds to conceal and protect the heating cables in electric radiant heat ceiling systems installed on gypsum wallboard. One particular construction design of these systems is rated for one-hour fire resistance by Underwriters' Laboratories.

All these products are slurried before spraying, are sprayed through small orifices of diameters of one-half inch or less, and coat and enclose the asbestos fibers in a cementitious matrix which hardens as it dries. These products contain a maximum of 12% of chrysotile asbestos.

These products are thus similar to the roofing compounds cited in testimony by Mr. F. H. Zimmerman of the Asbestos Information Association and to the plaster fireproofing products cited by Mr. B. R. Williams of W. R. Grace and Company. They would be expected to show extremely low airborne asbestos fiber emissions similar to or lower than those reported by Mr. Williams for a product containing 12% asbestos.

We have not yet found substitute materials which yield the product quality that asbestos gives to these products. It is unlikely that the fire rating of the radiant heat ceiling system could be retained without the use of asbestos in the surfacing compound.

Should the Environmental Protection Agency, after its review of the testimony given at the hearings, see fit to modify the proposed prohibition on spray application of asbestos-containing products, we request that the modified standards make provision for the use of the products we have described. We recommend that the proposed standard be revised as follows:

Paragraph 61.22

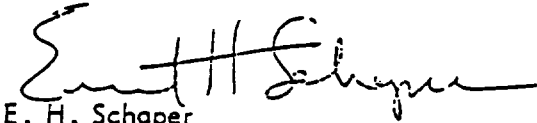
- (e) The spraying of asbestos is limited as follows:
  - (1) The spraying of any product which contains asbestos on any portion of a building or structure is prohibited, with the following exceptions:
    - (1.a) Wall and ceiling texturing products and radiant heat surfacing compounds containing less than 12% chrysotile asbestos which are mixed to a slurry with water before spraying, are spray-applied through orifices of a maximum diameter of one-half inch, and coat and enclose the asbestos fibers in a cementitious matrix which hardens as it dries, and are applied over a solid substrate such as gypsum wallboard.
  - (2) The spraying of any product which contains asbestos in an area directly open to the atmosphere is prohibited, with the following exceptions:
    - (2.a) Wall and ceiling texturing products and radiant heat surfacing compounds containing less than 12% chrysotile asbestos which are mixed to a slurry with water before spraying, are spray-applied through orifices of a maximum diameter of one-half inch, and coat and enclose the asbestos fibers in a cementitious matrix which hardens as it dries, and are applied over a solid substrate such as gypsum wallboard.

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Your favorable consideration of this recommendation is requested.

Very truly yours,

KAISER GYPSUM COMPANY, INC.



E. H. Schaper  
Vice President - Operations

EHS/bg

cc: H.C. Dupuis  
G.B. Kirk  
J.S. Sheahan  
H. Weightman

*John S. ...*  
*George ...*  
*...*  
ENVIRONMENTAL PROTECTION AGENCY

Office of Air Programs

Research Triangle Park, North Carolina 27711

March 10, 1972

*Ralph ...* (- Enment)

*John -*  
*File*  
*"Pollution ..."*  
Mr. E. H. Schaper  
Vice President - Operations  
Kaiser Gypsum Company, Inc.  
Kaiser Center - 300 Lakeside Drive  
Oakland, California 94604

Dear Mr. Schaper:

Thank you for your comments on our "Proposed National Emission Standards  
For Hazardous Air Pollutants: Asbestos, Beryllium, Mercury."

We will review your comments and consider them, along with all other  
comments, prior to promulgating the regulations this summer.

Sincerely yours,

*Don R. Goodwin*

Don R. Goodwin, Director  
Standards Development and  
Implementation Division  
Stationary Source Pollution  
Control Programs