April 11, 1973

Rede Below

C. W. Lehnert Tigard

CAUTION LABEL FOR JOINT COMPOUNDS CONTAINING ASBESTOS

TO:
Messrs: R. B. Hollingsworth - Wilmington E/O
T. W. Richards - Tigard

CC:
Messrs: O. E. Wilson - Portland
[illegible] L. Aasen - Portland
[illegible] D. Meyer - Portland
[illegible] F. Fink - Tigard
[illegible] Brown - Acme
J. [illegible] Rauch - Akron
[illegible] V. Favero - Marietta
H. W. Scharf - Milford
[illegible] A. Palmowski - Chicago

Review of OSHA regulations we believe it is in our best interest to begin marking our bags of joint compound which contain asbestos fiber. It is my understanding that our competitors will begin marking their bags shortly. The OSHA regulation reads as follows:

"(2) Caution labels—(i) Labeling. Caution labels shall be affixed to all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers, except that no label is required where asbestos fibers have been modified by a bonding agent, coating, binder, or other material so that during any reasonably foreseeable use, handling, storage, disposal, processing, or transportation, no airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section will be released.

(ii) Label specifications. The caution labels required by subdivision (i) of this subparagraph shall be printed in letters of sufficient size and contrast as to be readily visible and legible. The label shall state:

CAUTION
Contains Asbestos Fibers
Avoid Creating Dust

PLAINTIFF'S EXHIBIT
GP-14

EXHIBIT
I
Schutte
21513
PENGAD 800-631-6989

Note that there is no necessity to label ready mix. This exempts Milford. Also, we are far enough along with asbestos-free products at Acme that we should at least delay labeling there. We are probably a year or more away from eliminating asbestos at Akron, Marietta, and Chicago and should begin labeling all bag goods containing asbestos at these locations. We prefer not to purchase bags with this label that will confuse our orders (three plants getting labeled bags, one not). Also, we might eventually get stuck with a large inventory of bags with the label. Instead, we are suggesting a hand stamp or pressure sensitive label, whichever is most economical. We recommend that your plants begin labeling as soon as possible. If there are any questions, let us know.

C. W. L.

CWL:jg