FILE NAME: Kaiser Gypsum (KG)

DATE: 0000

DOC#: KG086

DOCUMENT DESCRIPTION: Legal - Excerpt - Kaiser Cement Supplemental Responses to Plaintiff's Standard Interrogatories - Case & Date Unknown

Barry Castleman's Kaiser Gypsum File
CD-ROM Document # KG 86 DATE 0
([redacted]) 0=undated

Type of Document

- peer-reviewed journal article
- trade publication article advertisement
- newspaper article
- proceedings from annual meeting
- conference abstract talk proceedings
- unpublished or internal report
- meeting agenda minutes report
- letter memo
- govt published report unpubl. inspection
- industry warning information
- book excerpt
- ✓ legal Kaiser Cement supplemented Responses to P's standard interrogatories —
- BC notes
- other Excerpt, case & date unknown

Current addresses, if any, are not known to Kaiser Cement. Some of these firms are known to have supplied chrysotile asbestos to Kaiser Cement during 1973 (when masonry cement with chrysotile asbestos as a component was manufactured).

I. Kaiser Cement's masonry cement was not intended for any of the special uses of shipyards, power companies or refineries. Kaiser Cement's masonry cement with chrysotile asbestos as a component was not sold to any customer located anywhere in California, and Kaiser Cement has no knowledge that it was used in any premises in California.

J. Kaiser Cement will make responsive documents sufficient to substantiate the above information available for inspection upon reasonable notice at the offices of Jackson & Wallace, 55 Francisco Street, 6th Floor, San Francisco, California, 94133. Kaiser Cement regards and maintains its product formulas as confidential business information. Kaiser Cement is prepared to produce available formulas for masonry cement that contained small amounts of chrysotile asbestos under a confidentiality agreement.

Plastic Cement

The only type of product Kaiser Cement sold to California customers that ever contained chrysotile asbestos was a specialty cement used to make stucco concrete for application on the exterior surfaces of building walls. During many years, Kaiser Cement manufactured plastic cement products that did not contain asbestos as a component.

The specific responses to the interrogatory subparts for the plastic cement products with chrysotile asbestos as a component are as follows:

A.-C. Kaiser Cement marketed four plastic cement products that contained chrysotile asbestos. Their trade names were Plastite, Plastic Gun Cement, Plastic Cement (hand) and Plasti-Spred. Plastite was first marketed with chrysotile asbestos as a component in 1944 and last marketed with chrysotile asbestos as a component in 1945, when the product was discontinued. Plastic Gun Cement was first marketed with chrysotile asbestos as a component in late 1959. Manufacture of Plastic Gun Cement in Northern California was discontinued in October 1973, when manufacture of the product was discontinued at Kaiser Cement's Permanente plant. Plastic cement for hand application that did not contain asbestos as a component was first introduced into the Northern California market during World War II. Plastic Cement (hand) with chrysotile asbestos as a component was first marketed in Northern California in December 1961. Manufacture of Plastic Cement (hand) with chrysotile asbestos as a component was discontinued in Northern California in July 1973, when Kaiser Cement's Permanente plant discontinued manufacture of the product. The Permanente plant resumed manufacture of plastic cement for hand application that did not contain asbestos as a component in July 1973. Plastic gun cement with chrysotile asbestos as a component was first manufactured at Kaiser Cement's Cushenbury plant in Southern California in February 1960. Chrysotile asbestos was removed from plastic gun cement manufactured at Kaiser Cement's Cushenbury plant in July 1976. Plastic Cement (hand) with chrysotile asbestos as a component was first manufactured at Kaiser Cement's Cushenbury plant in September 1963 and was last manufactured at the Cushenbury plant in August 1964. The Cushenbury plant began production of

plastic cement for hand application that did not contain asbestos as a component in late 1964. Plasti-Spred, a product similar to plastic cement for hand application, was first manufactured with chrysotile asbestos as a component in late 1961 and was last manufactured prior to the end of 1971, when the product was discontinued. Kaiser Cement has no knowledge that any of the four products with chrysotile asbestos as a component were ever marketed "on an experimental basis" or on a "test basis." None of these products was ever "recalled from the market."

D. The chemical composition of these products was as follows:

Plastite: Approximately 90% portland cement plus adhesive, plasticizing, and water repellent agents. Chrysotile asbestos: 6% by weight.

Plastic Gun Cement: Approximately 95% portland cement plus plasticizing and air-entraining agents. Chrysotile asbestos: 2.5% to 5% by weight.

Plastic Cement (hand): Approximately 95% portland cement plus plasticizing and air-entraining agents. Chrysotile asbestos: 1% to 5% by weight.

Plasti-Spred: Approximately 95% portland cement plus plasticizing and air-entraining agents. Chrysotile asbestos: 1% to 5% by weight.

The amount of chrysotile asbestos used as a component was a specific percentage of the product at any given time. Values stated above in a format such as "2.5% to 5%" mean that some formulas had 2.5% by weight chrysotile asbestos, formulas marketed at other times had 5% by weight chrysotile asbestos, and some formulas had amounts that were between 2.5% and 5% by weight chrysotile asbestos.

Kaiser Cement understands that contractors typically mixed one volume of the above products with three to five volumes of sand, so the percentage of chrysotile asbestos was much lower in the stucco concrete that actually was applied to exterior building surfaces.

E. The physical appearance of Kaiser Cement's plastic cement products with chrysotile asbestos as a component was similar. They all were gray colored powder, which reflected the fact that they were made mostly of portland cement. Kaiser Cement's plastic cement products that did not contain asbestos also were gray colored powder, for the same reason. Plastite was sold in sacks of 100 lbs. Plastic Gun Cement, Plastic Cement (hand) and Plasti-Spred with chrysotile asbestos as a component were packaged and sold generally in sacks of 96 lbs. In years when Kaiser Cement sold plastic cement for hand application that did not contain asbestos, that product also was packaged and sold generally in sacks of 96 lbs.

F. Plastite, Plastic Gun Cement, Plastic Cement (hand) and Plasti-Spred all were intended for the same general purpose. They were intended to be mixed with water and sand to form stucco concrete in slurry-like form (like pancake batter). The wet stucco concrete was spread on the exterior walls of houses or other buildings, where it dried to form a hard stucco concrete layer that served as part of the building's protection against weather and other outside elements. Plastite,