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**CertainTeed** 

PLAINTIFF'S  
EXHIBIT

CT-42

*File CPSC*

February 11, 1982

Mr. B. J. Pigg  
Executive Director  
Asbestos Information Association  
of North America  
1745 Jefferson Davis Highway  
Crystal Square 4, Suite 509  
Arlington, Virginia 22202

Dear Bob:

As requested at the last Executive Committee Meeting I have reviewed the proposed CPSC booklet, Asbestos in the Home, and I offer the following comments:

First, I question the need or desirability of such a booklet at all, however, if CPSC is determined to issue one this revised version is much better than the original proposal and, with a few exceptions, I would consider it acceptable. The areas which concern me and which I think should be reconsidered are:

1. On page 1, fourth question, I don't like the wording of the second sentence. I would like to see it changed to something like the following:

However, health studies of asbestos workers and others have shown that inhalation of asbestos fibers can increase the chances of adverse health effects.

2. On Page 2, in the first paragraph under APPLIANCES, I strongly object to the last three sentences. I think they are extremely misleading and any reference to the hair dryer fiasco should be left out unless it is stated factually.

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JAN - 23

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Page two

3. On page 3, under FURNACES AND STOVES, ETC.  
in the second paragraph I think the sentence  
"CHILDREN SHOULD NOT PLAY IN THE DUSTY AREA"  
is unnecessarily alarming. I think it should  
be revised to something like the following:  
  
All unnecessary activities in the dusty area  
should be avoided.
4. On page 4, last paragraph, I think the words  
"should" and "most" should be eliminated from  
the third sentence.
5. On page 5, are roofing, shingles, and siding  
considered consumer products? I wouldn't put  
them in that category.
6. Again on page 5, assuming that roofing is a  
consumer product, I think that the second  
sentence is misleading and could create much  
unnecessary concern. While it is true that  
some asphalt shingles were manufactured in the  
1940's with small amounts of asbestos fibers  
in the asphalt coating to improve their fire  
resistance, those shingles represented a very  
small percentage of asphalt shingles sold and  
risk of exposure from them is practically nil.  
I am not aware of any actual asbestos based  
asphalt shingles although there could have been  
some. True asbestos based asphalt roofing was  
made in roll form rather than in shingles and  
was used in built-up roofing systems on com-  
mercial and industrial buildings which would  
not fall into the consumer area as I understand  
it.

I think these observations are accurate, but  
if Jim Reis or someone else does not agree with  
them, I will stand corrected.

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Page three

7. On page 6, in the second "CAUTION" paragraph, the word "with" in the first sentence should not be there.

I hope that these comments will be helpful to you in responding to CPSC.

Best regards,

  
Thomas A. Dougherty  
Vice President -  
Industrial Relations

TAD/cml

cc: J. Reis  
J. Marsh  
J. Myers  
A. Wise  
K. Schwarz  
D. Poutiatine

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