149 - J. T. Allen
187 - W. Hogan
147-2 - C. M. Howard

July 30, 1971

PLAINTIFF'S EXHIBIT USG-362

TO: #147-2 - R. P. Entz

FROM: #198 - C. P. Kipp

SUBJECT: Joint Treatment Compounds

We have had as an open question what action to take regarding the labelling of the above product group.

Based on Marvin Schmidt's memo of May 11, 1970, to Mr. Earl Maynard the amount of dust generated under adverse conditions during sanding of a joint falls below the current threshold limit value of 5 fibers per c.c. established by the American Conference of Governmental Industrial Hygienists.

This might justify the position that this product line does not fall within the provisions of the Federal Hazardous Substances Act, but our attorneys have doubts about our ability to sustain this position.

In addition it is anticipated by some close to the asbestos problem that the threshold limit value may be reduced to 2 fibers per c.c.. As you know, proposed regulations of the Illinois Pollution Board set an exposure level of .5 fibers per c.c. for in-plant exposures, which is probably far below ambient air.

The two steps taken in the application of joint treatment compounds that make the product most subject to regulation are job mixing and job sanding. Both of these would be overcome if we limit ourselves to selling ready-mix and recommend that the use of sponging rather than sanding be used to get a level surface. Earl Maynard indicates just as good a job can be done with sponging.

If this sounds practical we might consider suggesting this procedure to the Gypsum Association which may care to pass this on to other manufacturers in the interest of public health.

If we take this step, Mr. Rohrman of our attorneys suggests that our label say either "Do Not Sand" or "Apply only in accordance with enclosed instructions." Our instruction sheet should explain how to sponge the joint after application.

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UNITED STATES GYPSUM COMPANY