

June 20, 1977

To the Consumer Product Safety Commission:

RE: Proposed Ban on Asbestos in  
Spackling Compounds and Wall  
Patching Materials

As a small manufacturer now in our 95th year, we have acted in good faith starting a reformulation program in early 1976 with a goal of converting our entire line to an asbestos free basis. Many factors enter into such a reformulation program including, from a competitive market standpoint, the importance of providing the consumer with equal quality and no major price penalty.

Our first conversion to a non-asbestos formula was in August of 1976, the second in December of 1976, and as of April 28, 1977, all production of asbestos containing paint sundry products was discontinued.

Although more time for product testing would be desirable, we fully expect and can accept a ban on said use of asbestos in wall patching materials.

We suggest, however, that as a product in use for centuries, asbestos is not an "imminent hazard" and recall places an unfair burden on today's manufacturers.

We believe that any recall program would have drastic financial impact on many small manufacturers, ourselves included, with no equity for the consumer when comparing a recent but unused purchase and therefore recallable, to earlier purchases already applied or consumed. Our products have been properly labeled to inform the consumer.

On this basis, it is our opinion and we respectfully request CPSC consideration of a phase out program of, at least, the stock already in commerce and preferably of stocks remaining in manufacturers inventories up to a predetermined deadline-- a procedure similar to that carried out with lead in paint, childproof containers, and similar areas of concern not new to commerce and only now considered a sufficient hazard to be banned.

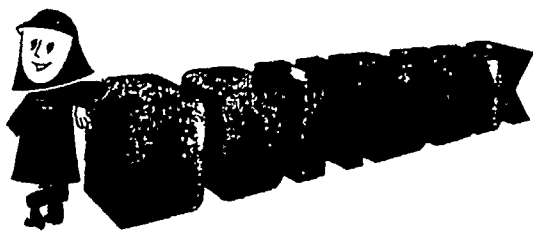
Your consideration of these facts will be appreciated.

Sincerely yours,

Julius K. Nemeth  
President

JKN/zh

BON - 01226



INTERNATIONAL

BRUNSWICK, OHIO 44212 U. S. A.

Phone 216 225-3169

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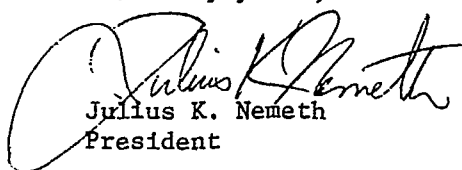
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ST. LOUIS • MONTREAL • TORONTO • TOMS RIVER, N. J.

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