Mr. G. E. Wilson, Gypsum Division
Georgia-Pacific - Portland, Oregon

JUN 14

Gypsum Association
201 North Wells Street, Chicago, Illinois 60606 (312) 726-5675

June 11, 1973

PLAINTIFF'S EXHIBIT
UC-5478

TO THE BOARD OF DIRECTORS

Gentlemen:

Re: Asbestos In Joint Treatment Compound

On Wednesday, May 30, 1973, representatives of the Gypsum Association met with OSHA representatives at the Department of Labor, Washington, D. C. Present were:

Frank H. Zimmerman	National Gypsum Company
Joseph Volk	National Gypsum Company
H. B. Carlsen	Gypsum Association

Representing OSHA were:

Fred Bishoff	-Deputy Administrator
C. R. McClure	-Chief Enforcement Administrator
M. S. Gabis	-Industrial Hygienist

The topic under discussion was Section 1910.93 of OSHA regulations (copy attached) pertaining to asbestos. Our concern was with the effect of the regulation on dry-mixing and sanding of joint treatment compound containing asbestos. We raised various questions in regard to responsibilities of the manufacturers of joint treatment compound where labeling, monitoring, contractor responsibilities, compliance, etc., are affected.

In strict interpretation of the text of the regulations, a number of questions arise. Although hazard levels for asbestos are stated, some preliminary investigations indicate that asbestos released in sanding joint treatment may be below OSHA hazard levels. On the other hand, preliminary tests indicate mixing of dry joint compound may be above the hazard level.

It was proposed to OSHA that the Gypsum Association would consider sponsoring a monitoring program, conducted by an independent laboratory, to determine and report the dust conditions on job sites under actual field conditions. The Association program needs to be developed in detail. It should include monitoring of all dust generated in a sanding operation including mica, silica, quartz, talc and total dust.

Following the development of the program and approval by the Board of Directors another meeting should be arranged with OSHA officials for their review and comments on its acceptability.

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The results of the program will provide the Gypsum Association with the necessary data to develop uniform procedures and guidelines for users of joint treatment compounds.

The OSHA representatives encouraged the Association to pursue this test program, and implied that this might allow a contractor group to possibly seek variances if they could show that Association procedures to mix and sand joint compound had been followed. It was definitely stated that if the proposed program was finalized and developed, it would certainly show good faith on the part of the manufacturer and the contractors who adhered to it.

With the approval of the Board the Executive Vice President of the Association can appoint a three or four member Association Task Group of individuals knowledgeable in joint treatment compounds and monitoring procedures to develop the program, evaluate information available, and consider hazards as they relate to OSHA and NIOSH requirements.

This preliminary approach to the asbestos dust hazard in joint treatment materials results from the Directors' approval of an investigation of the problem last April, and the suggestion that member companies contribute any accumulated data useful in determining a proper test program. The interest expressed by OSHA is encouraging. May we have your reaction to this report at your earliest convenience?

Yours very truly,

GYPSUM ASSOCIATION

H. B. Carlsen

H. B. Carlsen, Secretary
Technical Committee

HBC:mj
Enc.
cc: Chairmen of all Committees

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