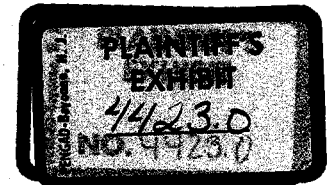


*Paul Green
Dick Green
D. C. Green
Robert Green*



*Al - Max Green
Please check
and follow up*



intra-company correspondence

to C. E. Peck - T/25

from Jon L. Konzen, M.D.

date July 5, 1972

subject ASBESTOS CAUTION LABEL

cc: B. E. Boyd - T/27
R. S. Grant - T/25 ✓
W. L. Kreutz - T/26
J. W. Overman - T/26
L. W. Saxby - T/23
J. Vyverberg - New York
J. J. Young - T/12

The Standard for Exposure to Asbestos Dust promulgated in the Federal Register Vol. 37, No. 110, Wednesday, June 7, 1972 by the Department of Labor under the authority of OSHA of 1970 becomes effective July 7, 1972.

The Standard prescribes a specific caution label which must be affixed to all raw materials, mixtures, scrap, waste, debris and other products containing asbestos fibers or to their containers so that during any reasonably foreseeable use, handling, storage, disposal, processing or transportation, no airborne concentrations of asbestos in excess of the exposure limits prescribed.



At the present time the caution labels prescribed in OCF Purchase Acceptance Standards PAS.2.1.13 and PAS.2.1.43 all dated 6-14-72 do not contain the exact wording noted in the Standard. From a health warning standpoint the OCF and OSHA caution label wording are reasonably similar.

It would be wise to determine if the two labels are legally similar enough so an OCF label change is unnecessary. In the event it is determined a label change is required it may be advisable to request a variance in order to use the labeled cartons already in stock and to cover the period until asbestos is removed from Kaylo products and possibly Fyrcor Products.

The procedure to request a variance is outlined under Rules of Practice for Variances - Exemptions Under the Occupational Safety and Health Act (Code of Federal Regulations, Title 29, Chapter XVII, Part 1905, 36 F.R. 12290). Subpart B - Applications for Variances, Limitations, Variations, Tolerances, Exemptions and Other Relief, paragraph 1905.11 Variances and other relief under Section 6 (d). This information is also contained in the BNA Occupational Safety and Health Reporter, Page 41:4101.

If it is determined a variance is required it is suggested this be done through the Legal Department.

If you have any questions or comments please contact me.

JLK:mgm

Jon L. Konzen M.D.

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