

FILE NAME: Friction Materials Standards Institute (FMS)

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DOCUMENT DESCRIPTION: Memo to Asbestos Study Committee RE Interpretation of OSHA Labeling Requirements

FRICTION MATERIALS STANDARDS INSTITUTE, INC., E-210 ROUTE #4, PARAMUS, N.J. 07652

November 6, 1972

TO: Delegates & Alternates
Asbestos Study Committee

SUBJECT: Interpretation of OSHA Labeling Requirements

The Chairman of the Asbestos Study Committee is requesting a survey of members on their interpretation of the labeling requirements for asbestos type brake lining and clutch facing shipments.

On June 20, 1972, the Institute distributed to all members a copy of the OSHA Standards for exposure to asbestos dust. A key paragraph in the standards had to do with labeling requirements:

(2) Caution labels--(i) Labeling. Caution labels shall be affixed to all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers, except that no label is required where asbestos fibers have been modified by a bonding agent, coating, binder, or other material so that during any reasonably foreseeable use, handling, storage, disposal, processing, or transportation, no airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section will be released.

The problem, in this case, is the shipment of asbestos containing brake linings or clutch facings where in many cases subsequent operations will be performed--cutting, grooving, drilling, and grinding. The Chairman indicates that these subsequent operations can produce airborne concentrations of asbestos fibers in excess of the current exposure limits (5 fibers/cc TWA, or 10 fibers/cc ceiling).

The questions are:

1. Do you now label asbestos type friction materials with the label as specified in the OSHA Standards?
 - 1.1 For replacement market shipments?
 - 1.2 For original equipment shipments?
2. Do you plan to label asbestos type friction materials with this label?
 - 2.1 For replacement market shipments?
 - 2.1 For original equipment shipments?
3. Do you interpret the OSHA Regulations on labeling to require a manufacturer to label asbestos type friction materials where subsequent operations (drilling, grinding, etc.) are likely to be performed?

Would you please complete this--or have it done by the individual responsible for implementation of the OSHA Standards--and return to me at the Institute Office.

E. W. Drislane
Executive Director

FMSI--0135

FMSI 02808

OSHA LABELING REQUIREMENTS

	<u>Yes</u>	<u>No</u>
<u>1. Current Labeling Practice</u>		
1.1 For replacement market friction material shipments, we now provide the OSHA caution label.	☐	☐
1.2 For original equipment friction material shipments, we now provide the OSHA caution label.	☐	☐
<u>2. Planned Labeling Practice</u>		
2.1 For replacement market friction material shipments, we plan to use the OSHA caution label.	☐	☐
2.2 For original equipment friction material shipments, we plan to provide the OSHA caution label.	☐	☐
<u>3. Interpretation of OSHA Labeling Regulations</u>		
3.1 We interpret the OSHA labeling regulations to require caution labels on friction material shipments that will have subsequent working (drilling, grinding, etc.).	☐	☐

BY _____

COMPANY _____

DATE _____

FRICTION MATERIALS STANDARDS INSTITUTE, INC., E. 210 ROUTE 4, PARAMUS, N.J. 07652

June 20, 1972

TO: MEMBERS OF ASBESTOS STUDY COMMITTEE

SUBJECT: OSHA STANDARD - POSITION OF INDUSTRY, NIOSH
AND ADVISORY COMMITTEE

Mr. I. H. Weaver, Chairman of the Committee, felt the attached tabulation proposed by AIA/NA comparing items in the OSHA Standard against the Industry position and the recommendations of NIOSH and the Advisory Committee on Asbestos Dust would be of interest to all members of this Committee.

Copies of this tabulation are attached for your information.

E. W. Drislane
Executive Secretary

EWD:llz

FMSI--0119

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FMSI 02833

<u>Subject</u>	<u>Industry Position</u>
1. Numerical Standard	Five fibers with <u>no</u> automatic reduction to two fibers.
2. Labeling	No label on locked-in asbestos containing products. The words "cancer" or "danger" should not be used on labels.
3. Monitoring Frequency	Monitoring should be conducted at a frequency necessary to assure compliance with the environmental standards. Management should decide frequency.
4. Protective Clothing	No protective clothing required below 5-10 times T.M.
5. Waste Disposal	Only wastes that generate dust in excess of limits should be bagged.

FMSI 02834

WORK ON ASBESTOS

NIOSH/Advisory Committee
Recommendation

Five fibers with an automatic reduction to two fibers in two years.

All asbestos-containing products should be labeled. Label should carry words "cancer" and "danger."

NIOSH: Annual monitoring at stations below TWA. Quarterly monitoring at stations above TWA. ADVISORY COMMITTEE: Twice-yearly monitoring at stations below TWA. Monthly monitoring at stations above TWA.

NIOSH: Protective clothing required in all areas above limit. ADVISORY COMMITTEE: No protective clothing below 10 times TWA.

All waste should be bagged.

Final OSHA Standard

Five fibers with an automatic reduction to two fibers in four years.

No label on locked-in asbestos-containing products. Words "cancer" and "danger" will not be used.

Monitoring every six months at stations above TWA. Monitoring at other stations at a frequency to assure compliance with environmental standards. Management to decide frequency.

Protective clothing required only where peak exposures above limit (10 fibers) occur.

Only wastes that generate dust in excess of limits must be bagged.

<u>Subject</u>	<u>Industry Position</u>
6. Frequency of Medical Examinations	Exams every two years for workers with less than 10 years exposure. Exams every year for workers with more than 10 years exposure, or with symptoms of disease.
7. Medical Surveillance	Employer should "provide or make available" medical exams as required.
8. Medical Records	Employer shall maintain records and have access to them as required to comply with regulations.
9. Wearing of Respirators	No specific recommendations.

FMSI 02835

NIOSH/Advisory Committee
Recommendation

Final OSHA Standard

NIOSH: Same as industry position. Advisory Committee: Same as industry position.

Annual exams required of all employees exposed to asbestos dust, regardless of length of employment.

NIOSH: No specific recommendation. Advisory Committee: Employee should select physician to perform exam. Employer to pay cost of exam.

Same as industry position.

NIOSH: No specific recommendation. Advisory Committee: Employer shall not maintain records nor have access to them.

Same as industry position.

NIOSH: No specific recommendation. Advisory Committee: No employee shall be required to wear a respirator if he has any of a long list of symptoms of disease.

Physician selected by employer to conduct medical surveillance program shall decide if employee can or cannot wear respirator.