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

B U L L E T I N

N O. 462

December 6, 1972

Asbestos
J.C

TO: ACTIVE MEMBERS

SUBJECT: SURVEY - OSHA LABELING REQUIREMENTS

On November 6, 1972 we sent out a request for information and interpretation of the OSHA regulations concerning labeling requirements for asbestos type brake lining and clutch facing shipments, where subsequent machining (cutting, grinding, drilling, chamfering, grooving) was likely to be done on these products.

Twenty-five questionnaires were sent out. Eleven replies were received. Replies were received from a reasonable cross-section of the membership. As the replies were confidential, the forms submitted by the members have been destroyed.

The survey will be a tool used at the next Asbestos Study Committee Meeting. It is suggested that members of the Committee attending the next meeting be versed in their own Company's position on labeling.

E. W. Drislane
Executive Director

EWD:llz

cc: Asbestos Study Committee

[redacted]

P-FMSI- 0019



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ASBESTOS STUDY COMMITTEE - LABELING SURVEY

(25 Requests 11/6/72, 11 replies 12/6/72)

	Question	Yes	No	Undecided	Not Applicable	Comment
1.1	Now label replacement shipments	1	10			
1.2	Now label O.E.M. shipments	1	9		1	
2.1	Plan to label replacement shipments?	5	3	3		A,B
2.2	Plan to label O.E.M. shipments?	5	2	3	1	
3.1	Interpret OSHA to require labeling where subsequent machining is expected?	9	2			C

A. Member replying YES, states: "If such practice is required and/or adopted by FMSI."

B. Member replying NO, states: "Our material has been treated with a binder - therefore no raw asbestos is present."

C. Member replying YES, states: "We will label if it is determined that our bonding or binding material does not meet the standard."