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MANUFACTURING CHEMISTS ASSOCIATION
1872 A CENTURY OF SERVICE 1972
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[redacted]
TECHNICAL DIRECTOR

March 15, 1972

Mr. G. F. Scannell, Director
Office of Safety and Health Standards
U. S. Department of Labor
400 First Street, N. W.
Washington, D. C. 20210

Dear Mr. Scannell:

The Manufacturing Chemists Association (MCA) submits the following comments with respect to the Notice of Proposed Rule Making on the Standard for Exposure to Asbestos Dust which appeared in the January 12, 1972 Federal Register. MCA is a nonprofit trade association of 165 United States company members representing more than 90% of the production capacity of basic industrial chemicals within this country.

Our comments deal specifically with the labeling proposal in the "Criteria for a Recommended Standard on Occupational Exposure to Asbestos" which, according to the supplement to the above notice that appeared in the February 25, 1972 Federal Register, will be submitted by the National Institute for Occupational Safety and Health for inclusion in the record of the proceeding.

Since this labeling proposal was introduced following the 30-day period for comment, it was obviously not possible to reply to it within that period. A phone call to your office on March 2 resulted in an indication that our comments on this proposal would be considered as though they had been submitted within the time limitation.

Attached is our suggested label text for asbestos. This text incorporates all the language proposed by NIOSH, and expands upon it to reflect additional critical information in the criteria which, in our opinion, will strengthen the message.

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This label text has been developed according to the principles contained in the MCA "Guide to Precautionary Labeling of Hazardous Chemicals." First issued in 1945 and revised on six subsequent occasions, this guide has become a widely-recognized text. Its principles have been accepted by the chemical industry in general, and by various agencies of government, for a period of over 28 years.

You will note that the attached suggested label does not include the NFPA 704M diamond symbol as proposed by NIOSH. MCA has consistently objected to use of this symbol as a means of expressing the hazards of substances, because of the need for an extensive educational program before interpretation of the numbers becomes comprehensible to the uninitiated, and because the system was designed to describe hazards under emergency conditions only. MCA believes that the English language representation of hazards is more effective than the NFPA symbol, and therefore should be used in this case.

Very truly yours,

George E. Burr

Attachment

cc: Dr. Charles H. Powell

ASBESTOS

WARNING ! HARMFUL IF INHALED
MAY CAUSE DELAYED LUNG INJURY
(ASBESTOSIS, LUNG CANCER)

Do not breathe dust.

Use only with adequate local exhaust ventilation or approved respiratory protective devices.

Remove dust and fibers from clothing only by vacuum cleaning.

Clean work areas only with vacuum cleaners or wet cleaning methods.