FILE NAME: Johns-Manville (JMA)

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AL 10269 1365

Environmental Control Department
Research & Engineering Center
August 7, 196[illegible]

[illegible]. S. Wingerter - Manville

Hazardous Product Labelling
Industrial Insulations Products

[illegible] have reviewed your letter and attachment dated August 5, 1969 presenting the [illegible]roblem of product labelling in your division.

[illegible] believe there is a basic decision to be made as to type of products that [illegible]equire labelling. I propose the following guideline.

> Only products that during handling, fabrication and/or installation generate asbestos fiber or crystalline silica containing dusts in potentially harmful quantities shall be labelled.

[illegible] this guideline is followed, then products such as

Fiberboard	Celerlith
Ebony	Chalkboard
Transite	Marinite
Dry Cements	85 % Magnesia
Thermobestos (presently labelled)	

[illegible]uld be labelled.

[illegible]oducts such as

Wet Cements	Ceraform
Albestal	Dumpcal
Novacal	Insulkote
Fire Brick	

[illegible]uld not be labelled.

[illegible]ducts such as

Millboard	Asbestos Paper
Thermomix	Min-K
Asbestos Felt	

[illegible]e in a "grey" area, and would need individual review.

[illegible]y I please have comments from you and copyholders on this approach.

[illegible]/as

E. M. Fenner

[illegible]. W. Hall - CIN
C. L. Buechler - CIN
G. Nebel - Manville
File 6 C

AL1042701 32

Environmental Control Department
Research & Engineering Center
February 17, 1969

CONFIDENTIAL

A. W. Dobson - Manville

Labeling of Insulating Products
Health Hazard Warning

I am not aware of any written policy concerning the hazard labeling of Johns-Manville's products.

I have been informed, second-hand, that Mr. Burnett has requested that asbestos containing materials, asbestos fiber shipping bags, and calcined Celite shipping bags are all to be labeled. Presently the Fiber Division is investigating the problems relative to labeling of asbestos fiber shipping bags. At this time, Celite, Thermobestos and insulating cements are shipped in labeled containers. I do not know if any consideration is given toward other asbestos containing products such as Marinite, Flexboard, Flat and Corrugated Transite.

E. M. Tanner

EMT/ems

cc: File
C

AL 10/27/55

Division Headquarters
Manville - Box 221
February 20, 1969

CONFIDENTIAL

C. P. Weber - New York

cc: R. Nebel - Manville, 221
A. Peelen - New York
P. J. Coggins - New York
file
chrono

HEALTH HAZARD MARKING-MARINITE PRODUCTS

Re: Your letter of February 1[illegible], 1969.

I have been attempting to obtain a formal statement of J-M policy with respect to health hazard labelling of J-M's sheet products.

I am attaching for your information a copy of E.M. Fenner's Confidential letter of February 17th to me on the subject.

In view of the fact that there is no expressed policy with regards to Marinite, Flameboard, Flat Transite, Cheesteam and Colorlith, I suggest that we take no action at this time on labelling of sheet products.

E. M. Dobson

EMD/jp

Attachment

AL 10269 1954

232

GHQ, Denver
July 12, 1972

D. B. Wingerter, 3S

LABELING REQUIREMENTS UNDER NEW OSHA ASBESTOS REGULATIONS

This will confirm our conversations regarding which J-M products should be labeled under the new OSHA regulations.

It is our opinion that the following "non-locked-in" products must be labeled with the asbestos warning label as printed in the Federal Register of June 7, 1972. A copy is attached.

"Non-Locked-In" Asbestos Products

Acoustical Products

Dry spray type
Foamed asbestos

Calcium-Silicate Sheets

Low density sheets (less than 50#/ft^3)

Cements

Gypsum joint cements
Insulating cements

Insulations

Low density calcium silicate binders
Asbestos paper
Low density magnesia binders
High temperature blocks & bricks

Papers & Felts

Commercial grades (unsaturated)
Roofing felts (unsaturated)
Gaskets (unsaturated or not encapsulated)
Millboards (unsaturated or uncoated)

23

Stucco & Plaster

Dry mix cement stucco
Dry mix decorative plaster

Textiles (unsaturated or uncoated)

Braided products
Cloth
Listing
Wicks
Yarn

We further recommend that all divisions carefully scrutinize each product on the so called "locked-in" list to determine which, if any, are capable of producing asbestos fiber levels in excess of the published limits when they are cut, sawed, drilled, fitted, ground, machined, or otherwise handled in normal usage by our customers. Some examples of products that should be viewed closely are:

1. Brake block or clutch facings shipped to another manufacturer for further machining.

2. AC products (Nashua line) that are shipped to fabricators for further cutting or machining.

3. Marinite products where the customer does extensive cutting during installation.

4. Certain gasket material that is shipped to a customer who subsequently cuts material using a band saw.

If there is any doubt as to which products produce fiber levels in excess of published limits during normal usage, we suggest that on-site tests be requested from E. M. Fenner's group.

The decision not to label should be carefully considered since the full weight of the OSHA citation and penalty system can be applied to the appropriate division or individual responsible. We would be happy to discuss with the division product manager individual products if additional opinions are needed.

W. B. Reitze

cc: R. M. Billings, 3S
C. L. Stake, 3S
H. M. Jackson, 1S
E. M. Fenner, 4N ✓

GHQ, Denver
June 7, 1972

TO: POLICY COMMITTEE

J. B. Jobe
H. M. Ball
J. E. Hesse
A. V. Lindell
A. B. Marchant
C. L. Pundsack
Ivan Sabourin
F. J. Solon, Jr.
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W. L. VanDerbeek
G. W. Wright, M.D.

cc: W. R. Goodwin
F. H. May, Jr.
J. A. McKinney
E. M. Penner
W. P. Goodwin
M. M. Swetonic, AIA/NA

OSHA HEARINGS

Attached is a copy of our press release which immediately followed the release made June 7 by OSHA (also attached) on the new asbestos regulations.

We consider this quite a victory for J-M and the industry and is a result of the fine job everyone in J-M did at the OSHA hearings in Washington last March. Our testimony had a definite effect on the time delay in going to two fibers and without a doubt, the strong case we presented on labeling had much to do with tossing out the warning label and retaining only the caution label for loosely-bound products.

The new OSHA regulations give us four years to study and decide on the feasibility of applying the two fiber standard to certain of our manufacturing operations. It also gives us time to conduct additional research to prove or disprove the credibility of the two fiber standard.

F. J. Solon, Jr.

AC 1150